

23rd December 2021

**The British Association for Shooting and Conservations response to Senedd petition
P-06-1201**

The British Association for Shooting and Conservation (BASC) is the largest shooting organisation in the UK. Our mission is to promote and protect sporting shooting and advocate its conservation role throughout the UK. Shooting activities in Wales contribute £75 million to the national economy directly supporting the equivalent of 2,400 full-time jobs.

BASC firmly oppose the proposals outlined the Senedd petition [P-06-1201](#). The Climate Change Minister stated that any “regulatory changes to the listing of amber and red listed species as shooting quarry would need to be underpinned by robust evidence to support that change”¹. BASC concludes that there is no evidence to support the petition proposals and as such there should be no change in policy.

BASC notes that the petition did not gain significant support, receiving a total of 122 signatures with only 92 signatories from Wales. The petitions threshold has recently been increased from 50 to 250 signatures and we note that if this petition was submitted now, it would have been rejected. Also, some statements made in the petition are provocative and are not supported by available evidence, and, in our opinion, are misleading. For these reasons, BASC are surprised that the committee and Minister are considering such a petition.

Quarry shooting is a legal and legitimate activity that brings both economic and conservation benefits to Wales. Those participating in shooting activities have an interest in ensuring there are sustainable quarry populations and shooting practitioners across the country undertake a range of conservation activities to monitor and enhance bird populations. Across Wales, shooting contributes to an annual spend of £7.4m on conservation, which is the equivalent of 490 full-time jobs or 120,000 conservation workdays. Game shoots and BASC affiliated wildfowling clubs and syndicates undertake large amounts of conservation work throughout the year, varying from single-species action plans to landscape-scale habitat management and site-specific wardening to monitoring initiatives. Game managers work to provide improved habitat while managing predators and disease benefitting other wildlife in the area as well as plants and trees, supporting overall wildlife conservation. Such activities improve the conservation of the countryside as a whole and benefit other species.

Correspondence from the Climate Change Minister and to chair of the petitions committee on 8th October 2021 stated that “any regulatory changes to the listing of amber and red listed species as shooting quarry would need to be underpinned by robust evidence to support that change and need to be considered alongside other factors that are contributing to the decline of these endangered species such as loss of habitat and the effects of climate change.”² The petition assertion is entirely spurious because it provides no logical reasoning or evidence of shooting being a factor and should be dismissed. Many species on the red and amber list have no association with shooting activities, highlighting the need to look at other factors that are influencing the decline in populations.

BASC believe that regulation is not the appropriate method to secure a species good conservation status and, in the long term, it will not reverse population declines. Such an approach may even prove counterproductive as it would remove the motivation to manage habitats and predators in way that benefits declining species. Shooting puts in place voluntary moratoriums when they may provide benefits to species conservation. Examples in Wales include Greenland White-Fronted Geese and Black Grouse. In other scenarios advice and guidance are utilised, for example the harvesting of woodcock is done on a precautionary basis.

¹ [Letter](#) from Julie James MS to Jack Sargeant MS

² Birds of Conservation Concern 4, [The population status of birds in the UK, Channel Islands and Isle of Man](#)

The petition highlighted several endangered birds that are on the quarry list. We have provided more information on them below.

In 2016 the Department for Environment, Food and Rural Affairs (Defra) rejected a petition calling for a moratorium on the shooting of woodcock, snipe and golden plover. The department did not believe shooting was to blame for declines in populations of wading birds stating that “it is unlikely that hunting has had a significant impact on recent population trends for woodcock, snipe and golden plover; trends are likely to be influenced more by the quality and extent of habitat.”³

Woodcock

- Shoots across Wales make an important contribution to the management of our woodland and woodcock habitat and already [self-regulate woodcock shooting](#).
- The petition notes that the woodcock is “experiencing dramatic population decline.” Wales has a small population of breeding woodcock and the majority of the woodcock found in Wales are migratory. Approximately 800,000 to 1.3 million woodcock migrate to Britain from Scandinavia, Finland, the Baltic States and Russia and research suggests that these breeding populations appear stable.⁴
- The Game and Wildlife Conservation Trust (GWCT) highlight that habitat appears to have a significant influence on the rise and fall of resident woodcock numbers and that the mixture of woodland habitats, or the landscape as a whole, may have a significant effect on woodcock abundance.
- The Woodcock *Scolopax rusticola* was one of only two species that are red-listed because of range decline alone.⁵ GWCT highlight that there are a range of factors influencing this such as the change of structure and mixture of woodlands and the increased fragmentation of woodlands and evidence suggests that shooting is not the main factor driving their decline. In Britain and Ireland research indicates that 2% of woodcock shot, nationally, are residents.⁶
- There is an indication, at a national scale, of a reduction in shooting pressure over the last 20 years, with many people deciding voluntarily that they no longer wish to shoot woodcock.
- Woodcock is not included on the Welsh Government species priority list under section 7 of the Environment (Wales) Act 2016, a list that outlines species that are considered ‘of principal importance for the purpose of maintaining and enhancing biodiversity in relation to Wales’.⁷
- The shooting community have funded two national surveys into the decline of the resident woodcock populations. This emphasises a desire to better understand the species and to ensure that shooting is sustainable.⁸ A GWCT study to attach GPS tags to resident woodcock is underway to try and better understand their breeding behaviour, their habitat requirements and the common causes of mortality to best advise those managing woodland.

Black Grouse

- The statements made in the petition regarding Black Grouse are misleading. There is a Wales-wide moratorium on shooting of black grouse already in place. This approach has the benefit of encouraging areas used for shooting to continue to manage for the species in the hope a sustainable harvest will appropriate in the future. It is cost effective to the public purse because it both achieves a zero take yet retains the incentive for local land managers to manage for the species.
- Evidence suggests that the reversal of the decline of the black grouse has been achieved by working with shoots, through voluntary restraint, the maintenance of good habitat and protection from generalist predators.

³ BASC, [BASC welcomes government response to Packham petition](#)

⁴ GWCT, [Woodcock the essential brief](#)

⁵ Birds of Conservation Concern 4, [The population status of birds in the UK, Channel Islands and Isle of Man](#)

⁶ GWCT, [Woodcock the essential brief](#)

⁷ Welsh Government, [Environment Wales Act \(2016\)](#)

⁸ GWCT, [Woodcock the essential brief](#)

- GWCT research identified that predation was the main cause of death in full-grown birds in all regions of the UK, with foxes and raptors most prominent cause in Wales.⁹

Greenland White-fronted Geese

- BASC are the current chair of the Wales Greenland White-fronted Goose Partnership and so are exceptionally knowledgeable about the conservation status and interventions the species requires.
- The species was not hunted on its principal Welsh site, the Dyfi Estuary since the wildfowling clubs brought in a voluntary moratorium in 1972. A Wales-wide voluntary moratorium from 2009. Welsh Government, following previous consultations on the species have judged these effective and chose not to legislate.
- However, the petition highlights a complaint from the Agreement on the Conservation of African-Eurasian Migratory Waterbirds resulted in the species being removed from the quarry list. This was technical requirement under the species international action plan, so the UK had no option to do otherwise. The real-world conservation benefit of doing this in Wales was nil.
- Data from the Greenland White-fronted Goose Study¹⁰ shows that Greenland White-fronted Goose numbers wintering in the UK have continued to steadily decline with population estimates in 2009 at 23,162 and the 2021 estimate at 20,186. Experts agree that the conservation issue with Greenland White-fronted Geese is their breeding success when summering in Greenland. That is where conservation action and resulting legislative change is required for the conservation of the species.

Snipe

- Snipe population declined rapidly from the 1970s to 2000 as a result of drainage of farmland. The population has been largely stable since and there is no evidence that shooting is contributing to declines.

Evidence highlights the positive impact of sustainable shooting on some bird species. Research has been undertaken on grey partridge populations. In the UK grey partridge bags are lower now than at any time during the last 200 years¹¹, yet grey partridges thrive in areas where they, and their habitat, is actively managed to allow for their sustainable shooting. Indeed, shooting is often cited as the primary driver of grey partridge conservation efforts across Europe.

The evidence collated highlights that proposals to ban the shooting of red and amber listed birds would have little impact on the species populations. Considering this, BASC questions why emphasis of species decline is being focused on shooting activities as there is no evidence to support this or to show that a ban will have a positive impact on population numbers. BASC notes that any review of the status of red and amber listed birds should be done as part of Natural Resources Wales Wild Bird Review. In light of, this BASC rejects the proposals outlined in the petition and urges the Welsh Government to work with the shooting community and allied partners to deliver positive conservation on the ground.

BASC would welcome the opportunity to discuss this topic and the importance of sustainable shooting to Wales with members of the petitions committee. We could provide a briefing in person to the Committee or/and facilitate a visit, to a wildfowling or other relevant group, to further highlight the points raised. For more information, please contact Bronwen Gardner, BASC Public Affairs Manager Wales, on bronwen.gardner@basc.org.uk

⁹ GWCT, [Black grouse survival and reproduction](#)

¹⁰ Greenland White Fronted Goose Study, [Report of the 2020/21 international census of Greenland White Fronted Goose](#)

¹¹ GWCT, [Long-term trends in grey partridge abundance](#)