



The Moorland Association

Beccy Speight
Chief Executive
Royal Society for the Protection of Birds
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18 September 2026

Dear Ms Speight,

RSPB reserve bird monitoring data and Defra Call for Evidence

The Moorland Association is currently preparing its response to Defra's Gamebird release, shooting and welfare during rearing in England: call for evidence.

As part of that work, we have been examining publicly available evidence concerning the outcomes for upland bird species under different forms of land management. This has included analysis of the RSPB's Annual Reserve Avian Monitoring data published through the NBN Atlas.

Our analysis has identified some interesting patterns, but also a number of important questions about the interpretation of the data which we would be grateful if the RSPB could help us resolve. In particular, when numerical counts from matched reserves/units are compared between the periods 2014-18 and 2019-23, excluding 2020 because of the obvious disruption to monitoring, the data show mixed outcomes.

The analysis produces higher average numerical counts for some species, including merlin, skylark and meadow pipit. For others, including curlew, golden plover, red grouse, black grouse, snipe and ring ouzel, the calculated average numerical counts are lower. We would particularly welcome the RSPB's explanation of why these lower recorded counts occur.

We are conscious that these figures must be treated with considerable caution. They do not, by themselves, demonstrate that RSPB management caused the differences in recorded counts. Indeed, one of the striking features of the dataset is the variation in monitoring and reporting between years and reserves. In some cases the balance between numerical counts and presence-only records changes substantially between years, while some reserve/species combinations have no apparent annual count. The effect is particularly obvious in 2020 but appears to occur in other years as well.

For transparency, we have enclosed the matched-reserve analysis and methodology on which these questions are based.

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Before drawing any conclusions from the data, we would therefore be grateful if the RSPB could clarify the following:

1. **Meaning and comparability of numerical counts**

What precisely does the numerical Individual count field represent in the Annual Reserve Avian Monitoring dataset? Depending on the species and survey, does it represent individual birds, breeding pairs, territories, nests or another measure? Are these numerical values intended to be directly comparable between years and reserves, and could you provide the relevant monitoring protocol or data dictionary?

2. **Survey coverage and effort**

What factors affect the comparability of annual numerical records, including the number of reserves surveyed, survey frequency and timing, observer effort and changes in survey methodology? Is reserve/species/year-level information on survey effort available, and could the RSPB provide the relevant survey protocols?

3. **Presence-only records**

Where a species is recorded as present but without a numerical count, what does that signify? In particular, should such a record be interpreted as evidence that no full count was undertaken, rather than as evidence of low abundance?

4. **Missing records**

Where no record appears for a species at a reserve in a particular year, does this normally mean that the species was not detected, that it was not surveyed, or that the relevant data were not submitted to the published dataset?

5. **Comparable annual data**

Does the RSPB hold more complete reserve-level monitoring data, including survey-effort information and metadata, which would allow genuine like-for-like comparisons of these species through time? If so, would it be willing to provide those data together with the relevant metadata and survey-effort information? Does the NBN Atlas dataset represent the complete Annual Reserve Avian Monitoring record, or a subset of the information held by the RSPB? Are equivalent data available for 2024 and 2025 and, if so, would the RSPB be willing to provide them?

6. **Suitability of the dataset for trend analysis**

Is the Annual Reserve Avian Monitoring dataset intended or considered suitable by the RSPB for analysing changes in species abundance or population trends through time, either at individual reserve or reserve-network level? If it is suitable only for particular species, reserves, periods or subsets of the data, please identify those circumstances. If it is not considered suitable for such analysis, what limitations prevent such use, and what dataset or monitoring methodology does the RSPB use instead when assessing trends across its reserve network?

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7. **Management information**

Is information available showing significant changes in management at the relevant upland reserves over the same period, including grazing, predator management, burning or cutting, rewetting, forestry or woodland establishment and other habitat-management interventions? Did any material changes also occur in reserve boundaries, survey plots, transects, monitoring areas or the area included within annual monitoring during the period? If so, we would be grateful if the RSPB could provide that information or direct us to where it is published.

8. **Explanation for lower recorded counts**

Our matched-reserve/unit analysis identifies lower average numerical counts in 2019-23 than in 2014-18 for a number of upland species, including curlew, golden plover, red grouse, black grouse, snipe and ring ouzel. **What does the RSPB consider explains these lower recorded counts?** Has the RSPB itself analysed trends in these species across its reserve network and, if so, we would be grateful for copies or links to that analysis and its assessment of the factors that may explain the recorded differences.

9. **Measuring the success of upland management**

How does the RSPB assess whether management interventions on its upland reserves have been successful in delivering outcomes for the bird species identified above? What species-specific objectives or outcomes, if any, are set, what monitoring metrics, baselines or benchmarks are used to assess success, over what period, and how are those results used to inform subsequent management decisions?

10. **The appropriate counterfactual**

More broadly, what does the RSPB consider to be the appropriate evidence-based comparator when assessing the biodiversity consequences of grouse-moor management? Does the RSPB consider outcomes on appropriately selected upland RSPB reserves to be relevant evidence for that comparison? If so, what criteria should be used to identify an appropriately comparable subset of reserves? If not, what comparator does the RSPB consider appropriate, and what evidence supports that choice?

11. **Evidence supporting policy conclusions**

Where the RSPB has advocated changes to grouse-moor management or regulation on biodiversity grounds, what empirical evidence does it rely upon to establish the expected biodiversity outcomes of those changes? In particular, what evidence demonstrates the likely outcomes for the upland bird species identified above?

These questions are particularly relevant to Defra's Call for Evidence.

Where land is presently managed for grouse shooting, assessing the environmental consequences of that management requires consideration not only of the present system but also of the likely outcomes under realistic alternative forms of land management. Those alternatives may involve changes in grazing, habitat management, predator management, forestry, rewetting, public access, conservation expenditure and other interventions.

We therefore consider that the counterfactual should itself be evidence-based rather than assumed.

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The RSPB's reserve network potentially provides valuable evidence with which to examine some of these questions. Equally, the published monitoring data illustrate why great care is needed before changes in recorded numbers are interpreted as changes in populations or attributed to particular management practices.

Our intention is to approach this evidence transparently. We are not suggesting that the published data demonstrate that RSPB management has caused the lower recorded counts identified above. We are seeking the information necessary to understand what the data can and cannot reliably tell us.

As this information is intended to inform our evidence to Defra, we would be very grateful for any clarification, supporting data or published analysis that the RSPB can provide and, if possible, **for a response by Friday 2 October.**

We would, of course, be happy to discuss the analysis with your conservation science team if that would be helpful.

Yours sincerely,

Andrew Gilruth

Chief Executive

Moorland Association

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Cc: Jeremy Wilson, Director of Science, RSPB
Baroness Hayman of Ullock, Parliamentary Under-Secretary of State, Defra
Stephen Darling, Defra Gamebirds Team
Professor James Pearce-Higgins, Director of Science, British Trust for Ornithology
Dr Andrew Hoodless, Director of Research, Game & Wildlife Conservation Trust

Encl: Matched-reserve analysis and methodology – RSPB Annual Reserve Avian Monitoring data

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