



The Moorland Association

Beccy Speight
Chief Executive
Royal Society for the Protection of Birds
The Lodge
Potton Road
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5 October 2026

Dear Ms Speight,

RSPB reserve bird monitoring data and Defra Call for Evidence

Thank you for your letter of 29 September in response to mine of 18 September.

Your clarification that the data published through the NBN Atlas comprise year-specific counts for individual RSPB reserves is helpful. It is also helpful to have the RSPB's confirmation that, because survey methods may differ between sites, sensitive-species data may be withheld or presented at reduced resolution, and surveyed areas may change over time, the published data are not appropriate for formal trend analysis.

That clarification does, however, make a number of the questions in my original letter more important rather than less.

I was slightly surprised by the suggestion that there was insufficient information about our methodology. The spreadsheet supplied with my letter included the methodology and calculation basis used for the matched reserve/unit comparison. If there is a particular aspect of that methodology which remains unclear, we would of course be very happy to explain it.

The purpose of our analysis was not to present the NBN dataset as a formal population trend analysis. As we made clear in our original letter, we were seeking to establish what the published data can and cannot reliably tell us, and what fuller evidence the RSPB holds and uses when assessing outcomes across its reserve network.

Your response now confirms that the RSPB does not consider the published NBN data appropriate for formal trend analysis. That leaves an important question: **what data and methodology does the RSPB itself use to assess whether management on its upland reserves is delivering the intended outcomes for bird populations?**

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I would therefore be grateful if the RSPB could respond to the following outstanding points from our original letter:

1. Does the RSPB hold more complete reserve-level monitoring data, including information on survey effort, methodology and the area surveyed, which would permit more robust like-for-like comparison through time?
2. Does the NBN Atlas dataset represent the complete Annual Reserve Avian Monitoring record held by the RSPB, or only a subset of the information available internally?
3. Are equivalent reserve monitoring data available for 2024 and 2025 and, if so, can these be made available?
4. What does a presence-only record signify, and how should the absence of a record for a species/reserve/year combination be interpreted?
5. What significant changes in habitat or land management occurred on the relevant upland reserves over the period considered, including changes in grazing, predator management, burning or cutting, rewetting, forestry or woodland establishment; and did any material changes occur in reserve boundaries, survey plots, transects, monitoring areas or the area surveyed?
6. What species-specific objectives, metrics, baselines or benchmarks does the RSPB use to assess the success of management on its upland reserves, and are the resulting assessments published?
7. Has the RSPB undertaken its own analysis of changes in curlew, golden plover, red grouse, black grouse, snipe, ring ouzel or other relevant upland bird populations across its reserve network and, if so, could you provide that analysis?

You also suggest that comparisons between species abundance under different land uses are somewhat tangential to Defra's Call for Evidence. We take a different view. If policy changes affecting grouse-moor management are being considered on environmental grounds, the relevant question is not simply what impacts are associated with the existing system, but what environmental outcomes are likely under realistic alternatives.

Those alternatives may involve different approaches to grazing, predator management, vegetation management, rewetting, forestry, public access, monitoring and conservation expenditure. Assessing the consequences of regulatory change therefore requires evidence about those alternative outcomes as well.

The same evidential standard should apply to every form of upland management.

That is why we also asked what the RSPB considers to be the appropriate evidence-based comparator when assessing the biodiversity consequences of grouse-moor management, and what empirical evidence it relies upon when advocating changes to grouse-moor management or regulation on biodiversity grounds.

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I would be grateful if you could address those questions as well.

We are not seeking to attribute changes in recorded bird numbers to RSPB management on the basis of the published NBN data. Your response confirms why that would be inappropriate. We are instead seeking to understand what evidence is sufficiently robust to assess outcomes, and to ensure that the same standard of evidence is applied when different approaches to upland management are compared.

Given the relevance of these questions to the evidence currently being considered by Defra, I would be very grateful for a substantive response to the outstanding points.

We would, as before, be very happy to discuss these questions with Jeremy and the RSPB 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

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