



The Moorland Association

Defra Gamebird Call for Evidence: A Practical Guide for Moorland Association Members

1. What is happening?

Defra is currently running a Call for Evidence on gamebird release, shooting and welfare during rearing in England. It opened on 4 September and closes at midnight on 1 November 2026.

It covers a wide range of issues, including biodiversity, protected sites and habitats, wildlife crime, the use of natural resources and other environmental and social impacts. Defra says that no decisions have yet been taken on future policy and that the purpose of the exercise is to improve the evidence base, including identifying areas where evidence is incomplete, uncertain or contested.

For Moorland Association members, the questions most relevant to red grouse concern wild birds and the management of the uplands.

This Call for Evidence matters because the information received will help inform any future policy development concerning gamebird shooting and associated land management. Defra has also stated that any future policy changes would be subject to consultation.

2. What is the Moorland Association doing?

The Moorland Association is preparing its own detailed response to Defra on behalf of the Association.

That response brings together published research, Government and statutory evidence, commissioned reviews, practitioner evidence and other relevant material concerning grouse shooting and the management of England's uplands. It is supported by a separate Evidence Schedule, which explains what the principal sources are, what they are being used to show and the important limitations that need to be kept in mind.

The MA is also encouraging members who hold useful estate-level information to consider making their own submissions directly to Defra.

The two are complementary but different.

The MA's response can bring together the wider evidence base and address the overall questions being asked by Defra. It cannot, however, replace records held by individual moors about what has actually happened in a particular place.

An estate may, for example, hold several years of bird counts, restoration records, wildfire information, licences, consents, grouse counts or other practical evidence that is not available to the MA centrally.

We therefore encourage members to consider whether they hold information which could usefully add to Defra's evidence base.

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3. Why your estate-level evidence matters

Defra is not asking only for academic research. It has expressly said that it welcomes a range of evidence, including peer-reviewed research, research reports, official statistics, monitoring data and **well-documented operational or experiential evidence**. Defra also says that greater weight will be given to evidence where the evidence trail is transparent and verifiable, the relevant context is explained and the methodology and limitations are clear.

That means information held by individual moors may be directly relevant.

Useful evidence might include, for example:

- species counts or breeding records
- habitat and vegetation-management records
- peatland restoration work
- wildfire prevention, preparedness or response
- licences, consents and management agreements
- grouse counts and bag records
- information about the use of shot grouse
- staffing, contractors, training or other management inputs
- evidence of community, social or recreational activity

A well-documented example from one estate can still be useful if it clearly explains what happened, where and when, how the information was recorded and what the evidence can reasonably show.

It is equally important to be clear about what your evidence cannot show. For example, a change in bird numbers occurring at the same time as a management change may be relevant evidence, but it does not automatically prove that the management change caused the result. Being open about those limitations makes evidence more useful, not less.

4. How we recommend members respond

Defra's preferred method of receiving responses is through its online Smart Survey portal.

<https://consultations.defra.gov.uk/call-for-evidence-on-gamebird-release-shooting-and-welfare-during-rearing-in-england>

If you are unable to use Smart Survey, Defra has confirmed that an emailed response will still be considered. For emailed responses, Defra would prefer you to use its response form. Alternatively, you can prepare **one clearly structured document**, following Defra's own question numbering, and submit it with any supporting material attached to gamebirds@defra.gov.uk. If you use a separate document, make sure it is clear which Call for Evidence question or questions each part of your evidence relates to.

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This guide identifies the questions most likely to be relevant to members and gives some prompts about evidence you may wish to consider under each one. If you have nothing useful to add to a particular question, simply leave it out or state **“No evidence to add”** and move on.

A short submission addressing only two or three questions can still be useful if the evidence is clear and properly explained.

5. In summary

- You do not need to answer every question.
- Concentrate on the questions where your estate holds useful records.
- Give dates, figures and documents where possible.
- Explain how the information was collected.
- Do not claim more than the evidence shows.
- Attach supporting records where useful.
- A short response to two or three questions can still be valuable.

Q8 to 15 – most relevant to those with access to biodiversity/SSSI records

Q16 – relevant to those with disease evidence

Q20 & 21 – only for those with direct relevant evidence on bird of prey crime

Q25 – particularly useful for most estates with access to bag records

Q28 – medicated grit/wildfire

Q29 – social/recreational evidence (not general economic evidence)

Note: do not use this Call for Evidence primarily to submit economic evidence. Defra is commissioning a separate independent assessment of the economic value of the gamebird sector.

6. What should each answer contain?

There is no need to make each answer complicated. For every Defra question you choose to answer, we suggest covering the following points where relevant:

What is the evidence?

Briefly explain what record, count, observation, report or other information you are relying upon.

Where and when does it relate to?

Identify the moor or estate, the relevant area and the period covered by the evidence.

How was it recorded?

Explain the method briefly where this matters. For example, was the information taken from annual spring bird counts, grouse counts, estate employment records, wildfire logs or restoration records?

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What does the evidence show?

Explain the factual point you think Defra should take from it. Keep this as clear and specific as possible.

What are the important limitations?

Say where appropriate what the evidence cannot establish. For example, survey effort may have changed between years, the records may cover only part of an estate, or more than one management or environmental factor may have changed at the same time.

Is there supporting material?

Where useful, attach or refer to spreadsheets, survey reports, maps, photographs, licences, consents, management plans or other contemporaneous records.

The aim is not to make every submission look like an academic paper. It is to make it easy for Defra to understand what the evidence is, where it came from, what it shows and how much can reasonably be inferred from it.

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Example Response Format

How to use this template. Defra's preferred method of response is through its Smart Survey. Members may use that route if they wish. This MA template is designed to help members organise estate-level evidence against the relevant Defra questions. It follows Defra's question numbering.

You do not need to answer every question. This template concentrates on the Defra questions most likely to be relevant to grouse moors. If you hold relevant evidence for another question, you should of course include it. If you have nothing useful to add to a question, leave it blank or state "No evidence to add".

Call for Evidence Questions - About you

Please Note: questions 1- 6 are mandatory. Defra states that responses which do not answer all questions marked "Required" will not be considered. After these initial questions, you are free to choose which evidence questions to answer.

Question 1: Would you like your response to this call for evidence to be confidential in the event of an access to information request? *(Required)*

MA guidance: In most cases, answer **No** unless your submission contains genuinely sensitive information. If you answer **Yes**, identify the specific material concerned and give a clear reason. Defra states that it will take confidentiality requests into account, but cannot guarantee that information will never have to be disclosed under access-to-information law.

Question 2: Your full name *(Required)*

Question 3: Your email address or postal address *(Required)*

Question 4: In what capacity are you completing this call for evidence? *(Required)*

Select **ONE** from this list and delete the others (for the full list see the Defra website)

- as an individual
- as a landowner or land manager
- as a farmer
- as part of the gamebird production sector
- as part of the gamebird shooting sector
- as a business
- as a representative of a non-governmental organisation or other non-profit organisation
- as a representative of a local community
- other

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Question 5: If you are responding on behalf of an organisation, what is the name of that organisation? *(Required)*

Insert the name of the estate, company, partnership or other organisation on whose behalf you are responding.

Question 6: Where are you, or the organisation you are representing, located? *(Required)*

England

Note on Question 7: This is included here for those members using Defra's online Smart Survey. If you are submitting a written response by email, you can omit this question. It is simply a routing question and adds no substantive evidence.

Question 7: Would you like to answer questions regarding gamebird release and shooting, or would you like to skip to the questions regarding gamebird welfare during rearing and breeding? *(this is simply a survey routing question on the Defra website)*

MA guidance: In most cases your response is "Answer questions on gamebird release and shooting"

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Section A: Call for Evidence Questions - Biodiversity

Question 8: What evidence is there of positive and/or negative impacts from: *(Optional)*

- a. grouse shooting;
- b. pheasant/partridge release and shooting;
- c. mallard release and shooting on biodiversity.
- d. and related activities.

MA guidance: This is likely to be one of the most important questions for grouse-moor estates. Defra is asking for evidence of both positive and negative biodiversity impacts, including impacts from the land-management activities associated with grouse shooting.

Members should focus on **what has actually been recorded on their own moor**, rather than making broad claims about grouse shooting generally.

Useful evidence might include:

Bird and species monitoring – for example, annual counts of curlew, golden plover, lapwing, snipe, black grouse, merlin, hen harrier, ring ouzel, red grouse or other species. Explain how long the records run, how counts were undertaken and whether the method has remained consistent. This is useful because Defra is trying to understand actual biodiversity outcomes, not simply whether management took place.

Breeding success or productivity records – such as curlew fledging success, grouse productivity or records of successful raptor nests. Productivity evidence can sometimes be more informative than simple presence or absence.

Habitat and vegetation management – records of heather cutting, controlled burning, grazing changes, scrub management, bracken control or other work undertaken to maintain or create habitat. Where possible, explain what condition existed beforehand and what changed afterwards. The MA's response stresses that different management practices can have different ecological effects and should not all be treated as one single pressure.

Predator management – records of predator-control effort and any accompanying bird-monitoring data. Members should avoid simply stating that predator control “caused” an increase unless their evidence can demonstrate that. It is safer to explain what management occurred and what was observed over the same period.

Peatland restoration and hydrological work – for example, grip blocking, revegetation, sphagnum planting, bare-peat restoration or changes to drainage. Include area treated, dates and any monitoring of vegetation, habitat condition or species response.

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Wildfire-risk and vegetation-fuel management – where relevant, evidence of firebreaks, managed vegetation, wildfire incidents or the consequences of fire for habitats and species. This is particularly useful where an estate can provide actual records rather than general assertions.

Changes in management over time – evidence can be particularly valuable where there has been a clear change, for example the introduction or cessation of keeping, predator management, grazing, burning, cutting or restoration. If species or habitat records exist before and after that change, include them.

Areas managed differently within the same estate – if one area is cut, another burned, another unmanaged, or predator management differs between areas, comparative records may be useful. Explain any important differences between the sites so Defra does not assume they are perfect experimental controls.

Negative as well as positive outcomes – members should include any relevant adverse effects they have recorded, not only positive ones. A balanced submission is more credible and helps demonstrate where particular practices may need improvement.

Supporting material – attach relevant spreadsheets, annual monitoring reports, maps, photographs, restoration reports or other records where they help Defra verify the evidence.

Advice on drafting your answer

Try to distinguish clearly between **what happened** and **why you think it happened**. For example, “curlew numbers increased from X to Y between 2018 and 2025 while predator management and habitat work were being undertaken” is an observed result. Saying that one particular intervention caused the increase requires stronger evidence.

Where other factors may also have influenced the outcome (such as weather, grazing, wider land-use change or survey effort) say so. Being clear about these limitations makes the evidence more useful.

A practical structure may include:

- a) **Evidence:** We have annual breeding-bird records for [estate/moor] covering [years].
- b) **Management during that period:** [brief description].
- c) **Observed outcome:** [what the records show].
- d) **Method:** [how the data were collected].
- e) **Important limitations:** [anything that affects interpretation].
- f) **Supporting material:** [spreadsheet/report/map attached].

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Question 9: What evidence is there of impacts on species included in national species indicators or Red List species? (Optional)

MA guidance: This is likely to be another important question for many estates. Defra is asking specifically about evidence relating to species which appear in national species indicators or on the Red List.

For upland estates, this may include species of particular conservation concern such as curlew, lapwing, black grouse, woodcock, hen harrier, merlin and ring ouzel, as well as Amber-listed species such as snipe and golden plover.

Members should concentrate on species for which they actually hold records. You do not need to comment on every species occurring on the moor.

Useful evidence might include:

- **Long-term species counts** – for example annual or periodic counts of curlew, golden plover, lapwing, snipe, black grouse, merlin, hen harrier or ring ouzel. Records covering several years are particularly useful because they can show whether numbers have increased, declined or remained broadly stable.
- **Breeding pairs and territory records** – where the estate records numbers of breeding pairs, occupied territories or lek counts rather than simple sightings, explain that clearly.
- **Breeding success and productivity** – for example the number of curlew pairs producing fledged young, successful merlin nests, hen harrier breeding attempts or black grouse lek counts. These records may provide information about breeding performance as well as presence.
- **Changes over time** – if a species has appeared, disappeared, increased or declined, provide the dates and figures where possible. Avoid relying simply on recollection if written records are available.
- **Management occurring over the same period** – briefly explain relevant habitat management, lawful predator control, grazing, restoration, vegetation management or other changes taking place while the species records were collected.
- **Changes in management** – evidence may be particularly useful where keeping, predator management, grazing or habitat management started, stopped or changed substantially and there are species records before and after the change.
- **Different parts of the same estate** – if a species performs differently in areas with different habitat or management, that comparison may be useful. Explain important differences between those areas rather than suggesting they are necessarily controlled comparisons.
- **Raptor records** – where estates hold records of hen harrier, merlin or other protected raptors, include breeding attempts, successful nests, fledging records and relevant monitoring where available. Keep confirmed records separate from anecdotal observations.

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- **Supporting monitoring material** – attach spreadsheets, keeper records, survey reports, maps, BTO-type survey information, photographs or other material that helps Defra understand how the figures were obtained.

Do not assume that a change in a species automatically proves what caused it. If curlew increased while predator control and habitat management were being undertaken, report both facts. If other things also changed (such as weather, grazing, survey effort or surrounding land use) say so.

A simple structure would be:

- a) **Species:** Curlew
- b) **Period covered:** 2016–2026
- c) **Evidence:** Annual breeding-pair and productivity records for [moor/estate].
- d) **Method:** [brief explanation of how counts were undertaken].
- e) **Observed trend:** [for example, breeding pairs increased/declined/remained broadly stable].
- f) **Relevant management during the period:** [predator control, vegetation management, restoration, grazing etc.].
- g) **What the evidence shows:** [the factual observation].
- h) **Important limitations:** [for example, survey effort changed, other management also changed, or the records cover only part of the estate].
- i) **Supporting material:** [spreadsheet/report/map attached].

If you have good records for several species, we would suggest using a short subheading for each species rather than mixing them together. That will make it much easier for Defra to understand and assess the evidence.

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Question 10: What evidence is there that practices aligned with recognised regulatory requirements, industry codes or guidance increase the likelihood of positive outcomes and reduce the risk of negative outcomes for biodiversity? (Optional)

MA guidance: This question is about whether **good practice actually makes a difference in practice**. Defra is not simply asking whether regulations, codes or guidance exist; it is asking for evidence that following them improves biodiversity outcomes or reduces environmental risks.

This question may be particularly useful for estates that can show **what standard or guidance they followed, what they actually did differently as a result, and what outcome or reduction in risk was observed**.

The MA's own response makes the same distinction: codes and guidance can be valuable, but their effectiveness depends on their evidential basis, implementation, monitoring and whether they deliver measurable outcomes.

Useful estate evidence might include:

- **Natural England consents or agreed management plans** – for example, where work on an SSSI is undertaken under an agreed consent or management plan. Explain what requirements applied, what management was undertaken and what monitoring or habitat/species outcome followed.
- **Heather and vegetation-management standards** – evidence showing how burning, cutting or other vegetation work has been carried out in accordance with recognised guidance, including measures to protect sensitive habitat, peat, watercourses or nesting birds.
- **Changes made because of guidance** – particularly useful evidence is where an estate changed a practice in response to updated guidance or regulation. Explain what was done before, what changed, and whether any outcome or reduction in risk was subsequently recorded.
- **Species-protection measures** – for example, procedures for identifying nesting birds, avoiding disturbance, protecting raptor nests or adjusting management around sensitive species.
- **Lawful predator-control practice** – evidence of training, record keeping, legal compliance and procedures designed to ensure predator management is undertaken lawfully and selectively.
- **Monitoring linked to management standards** – for example, bird counts, habitat-condition monitoring or photographic records collected before and after management undertaken in accordance with a recognised standard.
- **Training and competence** – records of keeper or staff training relevant to vegetation management, wildlife law, wildfire, pesticide use or other activities. This is stronger where the estate can explain how training changed practice rather than simply recording attendance.

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- **Audits** – if an estate is subject to an audit, accreditation, environmental management system or other independent assessment, explain what is checked and whether non-compliance or improvement actions are recorded and followed up.
- **Practical examples of risk being avoided or reduced** – for example, changing the timing or location of work to protect nesting birds, creating buffers around sensitive areas, or modifying vegetation management because of site conditions.
- **Examples where guidance has not worked as intended** – Defra asks about both positive and negative evidence. If a requirement is impractical, produces an unintended consequence or conflicts with another environmental objective, that may also be relevant provided the example is documented.

Do not simply list the codes, regulations or guidance that the estate follows. Defra is asking whether following them produces better outcomes or reduces risks.

Evidence of adoption, compliance and outcomes is much more useful. So:

“We comply with the Heather and Grass Management Code”

is much less useful than:

“Following the introduction of the revised guidance, we changed [practice] in [year]. The change involved [details]. Monitoring undertaken between [dates] recorded [outcome].”

What makes a strong Q10 example?

Ideally, try to show the sequence:

Standard or guidance → change in management → evidence that it was implemented → observed outcome or reduction in risk.

For example:

Standard/guidance followed: [name of code, consent or guidance]

What we did: [specific management action]

Period: [dates]

How compliance was recorded: [management log, consent, audit, photographs etc.]

Observed outcome: [species/habitat/risk result]

Why we consider the standard relevant: [brief explanation]

Important limitations: [other factors which may have influenced the result]

Supporting material: [documents attached]

Members should avoid assuming that because an estate complied with a code and biodiversity subsequently improved, **the code necessarily caused the improvement**. Where that causal link cannot be demonstrated, simply report the facts:

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“The practice was introduced in accordance with [guidance], and the following outcome was recorded over the same period.” That still provides useful estate-level evidence without claiming more than the records can establish.

Question 11: What evidence exists on the factors that influence whether practices aligned with recognised regulatory requirements, industry codes or guidance are adopted and maintained? (Optional)

MA guidance: The previous question asks whether good practice improves outcomes. This Q11 asks what makes land managers actually adopt and maintain that good practice.

Defra is interested in the practical factors that help or hinder adoption of recognised standards, codes and guidance. Defra’s wider Call for Evidence also says it wants evidence on the effectiveness of current regulatory and voluntary approaches and any blockers to adoption.

For many MA members, this is a useful opportunity to explain **what works in practice and what gets in the way**.

Useful estate evidence might include:

- **Clarity of the requirement** – are the rules or guidance easy to understand? Is it clear what environmental problem they are intended to address and what outcome is expected?
- **Whether the requirement is practical on the ground** – can it actually be implemented on the particular moor, given terrain, weather, vegetation, access, staff and timing?
- **Evidence behind the requirement** – members may wish to explain whether they are more likely to adopt a practice when the purpose and supporting evidence are clearly explained.
- **Cost and resources** – staff time, equipment, contractor availability, training, monitoring costs or administrative burdens may affect whether a practice can be adopted and maintained.
- **Regulatory certainty** – long-term management may be easier where requirements, licences and consents are sufficiently predictable to allow estates to plan staff, investment and habitat work.
- **Length and timing of permissions or consents** – if a short permission, delayed decision or seasonal timing makes a practice difficult to deliver, give a specific example and explain the practical consequence.
- **Consistency between different requirements** – members may have examples where one environmental objective, consent or regulatory requirement supports an activity while

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another makes delivery more difficult. Explain the actual conflict rather than simply saying that regulation is burdensome.

- **Engagement with regulators** – examples where early discussion with Natural England or another body helped produce a workable solution can be useful, as can documented examples where lack of engagement created avoidable difficulties.
- **Involvement of practitioners in designing standards** – if a code or management requirement was easier to implement because people with practical moorland experience were involved, explain why.
- **Training and competence** – members may have evidence that training, refresher courses, mentoring or clear operating procedures helped maintain standards.
- **Monitoring and feedback** – if people are more willing to continue a practice because monitoring shows that it is working, give the example. Equally, if a requirement continues even where monitoring suggests it is not delivering the intended result, that may also be relevant.
- **Recognition of good performance** – where demonstrably good standards, audits or environmental management systems provide a practical incentive to maintain good practice, explain the example and what benefit follows.
- **Voluntary approaches** – if an estate has adopted and maintained a voluntary standard without being legally required to do so, explain why: peer expectations, conservation benefit, clear guidance, keeper professionalism, assurance requirements or another factor.

What makes a useful answer?

We encourage members to give **specific examples**, not simply general views about regulation.

For example, instead of: “*Licensing is too bureaucratic.*”

a stronger evidence-based response would be: “*In [year], the estate applied for [consent/licence] to undertake [activity]. The application took [time] and permission was received on [date]. Because [seasonal/weather/operational constraint], only [part/all] of the planned work could then be completed. The consequence was [factual result].*”

Likewise, instead of: “*Good guidance encourages compliance.*”

Stronger response:

Requirement or guidance: [what it was]

Why it was adopted: [clear evidence, practical design, regulator advice, training etc.]

What the estate did: [specific action]

What helped: [factors]

What made it difficult: [if applicable]

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Was the practice maintained? [yes/no and for how long]

Evidence: [records, correspondence, consent, training log, management plan etc.]

Please note: This question is not simply an invitation to complain about regulation.

The strongest estate evidence will show why a particular requirement was adopted successfully, why another proved difficult to implement, or what specific change would make continued compliance easier while still achieving the environmental objective.

This then gives Defra something practical it can assess rather than a general expression of support or opposition.

Question 12: What evidence exists of links between gamebird activities and damage to protected sites or habitats, or positive impacts on biodiversity within protected sites?
(Optional)

MA guidance: This question is particularly relevant if your moor includes, overlaps with or lies alongside a **SSSI, SPA, SAC or other protected habitat**. Defra is asking about both **damage** and **positive biodiversity outcomes** within protected sites.

The key point is to focus on the **specific protected feature and the specific management activity**. The MA response stresses that impacts should be assessed site by site and feature by feature, rather than assuming that the presence of grouse shooting itself proves either harm or benefit.

Useful estate evidence might include:

Which protected site or feature is involved – identify the SSSI, SPA, SAC or other designation and, if known, the particular habitat or species feature concerned. This helps Defra understand what exactly is being protected.

SSSI condition information – include Natural England condition assessments, unit information or other monitoring where relevant. However, do not assume that an “unfavourable” classification proves what caused the condition. Condition describes the state of the feature; a separate evidential chain is needed to identify the cause.

Species monitoring within the protected site – for example, records of curlew, golden plover, lapwing, snipe, merlin, hen harrier, black grouse or other notified or relevant species. Explain the period covered and how the records were collected.

Habitat-management records – such as burning, cutting, grazing changes, scrub control, bracken management or other vegetation work. Explain where the work took place, why it was undertaken and what habitat or species outcome was observed.

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Predator management – where relevant, provide records of predator-control effort alongside species or breeding data. The MA response notes that predator abundance and lawful predator management can materially affect some protected upland bird species, while also recognising that effects vary between species and sites.

Peatland restoration and hydrological work – for example grip blocking, bare-peat restoration, sphagnum establishment, erosion control or changes to drainage. Include dates, areas treated and any habitat or species monitoring.

Grazing changes – if sheep numbers, grazing regimes or livestock distribution have changed, explain this. The MA response specifically notes that grazing can be an important independent pressure on protected upland vegetation and may interact with burning, cutting, hydrology and climate.

Wildfire and fire-risk management – where wildfire has affected a protected site, or where fuel-management measures have been undertaken to reduce risk, include actual incident records, areas affected, recovery information or preventive work.

Natural England consents and management agreements – these can help demonstrate what work has been agreed, what protected feature it was intended to address and what happened afterwards.

Changes over time – evidence may be especially useful where there has been a clear change in keeping, grazing, vegetation management, restoration or other land use and there are records before and after that change.

Negative impacts as well as positive ones – if an activity caused damage, or an estate altered a practice because of an identified risk to a protected feature, that is relevant evidence too. The MA response expressly recognises that grouse-moor management can cause harm where an intervention is inappropriate for the site, location or protected feature.

The key point for members: Do not simply say that a site is in good or poor condition and attribute that to grouse management. Try to identify the particular management practice, the protected habitat or species affected, and the evidence linking the two.

Basic: *“This SSSI unit is in favourable condition [or not] and is managed for grouse shooting”*

Better: *“Between 2018 and 2025 the estate undertook [specific management] within [named SSSI unit]. Monitoring of [protected feature/species] recorded [result]. The work was undertaken under [consent/management agreement].”*

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How you might structure your answer

Protected site: [name of SSSI/SPA/SAC]

Protected feature: [habitat/species where known]

Period covered: [years]

Management undertaken: [specific activity]

Evidence: [monitoring, condition data, counts, photographs, reports etc.]

Observed outcome: [what changed or remained stable]

Other relevant pressures: [grazing, hydrology, wildfire, climate, historic drainage etc.]

Important limitations: [what cannot be attributed with confidence]

Supporting material: [consents, maps, monitoring reports, photographs etc.]

Where the evidence concerns a protected site, **Natural England paperwork and long-term estate records can be particularly useful**, because they may help show not only what management took place but what feature it was intended to protect and what outcome followed.

Question 13: What evidence exists on whether, and how, high standards of practice reduce risks to protected sites and habitats? *(Optional)*

MA guidance: This question follows directly from the previous one but asks a narrower question. Defra is not asking simply whether an estate follows good practice. It is asking whether there is evidence that **particular standards of practice actually reduce an identified risk to a protected habitat or feature**.

For members, the strongest evidence will therefore link: **protected feature → identified risk → standard or practice used → what happened as a result**.

Useful estate evidence might include:

- **Vegetation-management standards** – for example, records showing that burning or cutting was undertaken within defined operating conditions, at particular times, in particular weather or vegetation conditions, with sensitive areas excluded. Explain what environmental risk those safeguards were intended to reduce and what was observed afterwards.
- **Training and competence** – evidence that staff undertaking potentially sensitive management have appropriate experience or training. This is particularly useful where competence changes how an activity is carried out or reduces the likelihood of damage.
- **Weather, fuel and site conditions** – where management is only undertaken within defined conditions, provide examples of those limits and, if available, records showing when work was postponed or stopped because conditions were unsuitable.

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- **Protection of sensitive habitats or features** – examples might include exclusion zones, buffers around watercourses or sensitive vegetation, avoiding particular peat depths or habitat types, protection of nesting areas, or site-specific restrictions agreed with Natural England.
- **Scale and location of management** – records showing how burn size, cutting areas, grazing levels or another intervention are controlled to reduce risk to the protected feature.
- **People and equipment** – where adequate staffing, firefighting equipment, access arrangements or other resources form part of the standard, explain how these are used to manage risk.
- **Natural England consents, management plans and method statements** – these may provide useful evidence of the agreed standard and the environmental risk it is intended to address. Where possible, combine them with evidence of what happened after the work was undertaken.
- **Monitoring following management** – photographs, vegetation surveys, peat monitoring, bird counts, hydrological measurements or other records may show whether the intended protection or improvement was achieved.
- **Examples where management was changed because monitoring showed a problem** – these can be particularly useful. High standards are not only about getting everything right first time; they can also involve detecting an adverse or disappointing result and adapting the practice.
- **Examples where following an approved process did not produce the intended outcome** – this is also relevant evidence. The MA response gives the example of practitioner monitoring of Sphagnum inoculation following approved vegetation cutting where survival was very low in some locations. That does not show that the technique fails generally, but it illustrates why compliance with a process and achievement of the environmental outcome should not automatically be treated as the same thing.

A particularly useful area: prescribed vegetation management

The MA's current response identifies direct UK research in which prescribed burns carried out by trained teams under defined vegetation-fire standards resulted in very limited heating of the underlying organic soil under the conditions studied. Importantly, the response also records the limitations of that research: it concerned eight burns, experienced teams and relatively mild conditions, and did not establish the wider or long-term effects of burning.

For members, the lesson is **not simply to say that controlled burning is safe**. A more useful estate submission would explain, for example:

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“We undertake prescribed vegetation management only under [specified conditions]. Staff are trained in [relevant practice]. We record [weather/fuel moisture/burn size/location]. Sensitive features are excluded by [method]. Our monitoring after management consists of [records]. Over [period], we have observed [outcome].”

That gives Defra evidence about **how a standard operates in practice**.

What does Defra need to be able to see?

Try to show more than compliance. Saying “we complied with the consent/code” shows that a process was followed but the response is stronger if you can also show what risk the requirement was intended to control and what happened to the protected feature afterwards.

The MA response itself proposes essentially this evidential sequence: identify the protected feature, identify the pressure or risk, identify the practice intended to address it, establish whether it was implemented, and then examine the measured environmental outcome.

How you might write your answer

Protected site/feature: [SSSI/SPA/SAC and relevant feature]

Risk being managed: [what could cause harm]

Standard or practice followed: [consent/code/method/estate procedure]

What was actually done: [brief factual description]

How implementation was recorded: [logs, photographs, training records, maps etc.]

Monitoring undertaken: [what was measured afterwards]

Observed outcome: [what the evidence shows]

Did the practice need to be changed? [if relevant]

Important limitations: [anything preventing a firm conclusion]

Supporting evidence: [attach relevant records]

If you can show that a particular safeguard prevented damage, reduced a measurable risk, or was changed when monitoring showed it was not working, that is potentially valuable evidence for Q13.

Question 14: What evidence is there that gamebird release or shooting affects the condition of Sites of Special Scientific Interest (SSSIs), or the wildlife, habitats or geological features for which they are protected? (Optional)

MA guidance: This question is specifically about **SSSIs and the features for which they are designated**. For many estates this could be an important question, particularly where substantial areas of the moor are within an SSSI.

The relevant evidence will usually concern the **land-management associated with grouse shooting**, rather than the act of shooting itself. Which particular practice affects which notified SSSI feature, in what way, and what evidence demonstrates that relationship?

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Useful estate evidence might include:

- **Which SSSI is involved** – give the site name and, if possible, the relevant SSSI unit or units. This allows Defra to connect your evidence to the statutory site record.
- **What the notified features are** – for example blanket bog, upland heath, breeding bird assemblages or particular species. Your response to this question is much stronger if you identify the feature potentially affected rather than simply saying that the estate is an SSSI.
- **Natural England condition assessments** – include current and previous classifications where available, particularly if these demonstrate change over time. If possible, provide the dates and the reason recorded for the condition assessment.
- **The reasons for unfavourable condition** – where Natural England records particular pressures or actions required, include them. This can be particularly valuable in distinguishing grouse-related management from other factors such as grazing, drainage, hydrology, atmospheric deposition, wildfire or historic land use.
- **SSSI consents and notices** – provide examples of Operations Requiring Natural England's Consent, consents issued, agreed methods or management plans. These can help show what management was authorised and what safeguards applied.
- **Evidence following consented management** – where burning, cutting, restoration, grazing or another activity was consented, provide monitoring showing what happened to the relevant feature afterwards.
- **Bird monitoring** – if birds form part of the notified interest, include breeding-pair, territory, productivity or longer-term count data. The MA identifies research showing that some grouse-moor management practices can affect species relevant to protected upland sites, but also stresses that responses vary between species, sites and interventions.
- **Habitat monitoring** – vegetation surveys, Sphagnum records, heather condition, bare peat, erosion, photographs, peat-depth records or other repeat measurements may be particularly useful for habitat features.
- **Peatland restoration** – give the area restored, work undertaken, dates and any measured response. This could include grip blocking, erosion control, revegetation or Sphagnum establishment.
- **Vegetation management** – where burning, cutting or grazing is relevant, describe the particular technique, frequency and site conditions. Different vegetation-management techniques can produce different effects, so Defra should not assume that all forms of vegetation management are ecologically interchangeable.

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- **Predator management** – if notified bird features are monitored, evidence showing predator-control activity alongside breeding outcomes can be relevant. Again, members should report what the records show without claiming a causal effect beyond what the evidence can support.
- **Wildfire** – if an SSSI unit has actually been affected by wildfire, provide the date, area burned, severity where known, effects on the protected feature and subsequent recovery. Actual site-level evidence is much more useful than a general statement about wildfire risk.
- **Changes in management** – if keeping, grazing, cutting, burning, restoration or another major management activity began, ceased or changed, and there are SSSI or species records before and after, that may be particularly useful evidence.
- **Negative outcomes** – where an estate's own monitoring or Natural England assessment has identified damage caused by a particular practice, include it and explain what was subsequently changed. Defra is seeking evidence in both directions.

One particularly important Point: a SSSI being in “unfavourable condition” does not, by itself, show what caused that condition. The MA submission makes this distinction explicitly: SSSI condition is evidence about the **state of the protected feature**, but identifying the cause requires a further evidential chain.

So members should avoid an argument such as: *“Our SSSI is favourable, therefore grouse management caused it.”*

Equally, an unfavourable SSSI on a grouse moor should not automatically be attributed to grouse management without evidence identifying the pressure responsible. A much stronger response would be: *“Unit 12 was assessed as unfavourable in 2018, with [identified pressure] recorded as a reason. Between 2019 and 2024 we undertook [specific management]. The subsequent assessment/monitoring recorded [result].”*

Check your Natural England records before answering Q14.

Members may have more useful evidence for this question than they initially realise. Look for:

- SSSI citations and unit information
- Natural England condition assessments
- consents and correspondence
- management agreements
- habitat surveys
- bird monitoring
- maps and photographs
- records of work undertaken in response to Natural England advice

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How you might draft your answer

SSSI: [name]

Unit(s): [if known]

Notified feature(s): [habitat/species]

Condition: [favourable/unfavourable etc., with date]

Relevant management: [what the estate actually does]

Period covered: [years]

Evidence: [Natural England assessment, monitoring, counts, photographs etc.]

Observed outcome: [what changed or remained stable]

Other relevant pressures: [grazing, drainage, wildfire, weather, historic management etc.]

What can reasonably be concluded: [keep this proportionate to the evidence]

Supporting documents: [list attachments]

The strongest submissions will connect the evidence to a particular SSSI feature and a particular management practice, rather than treating either “grouse shooting” or the SSSI condition label as an explanation in itself.

That is also consistent with the MA response's proposed approach: **site-specific, feature-specific and causal**, recognising both demonstrated harm and demonstrated benefit.

Question 15: What evidence is there that particular factors influence compliance with high standards of practice in relation to protected sites and habitats? (Optional)

MA guidance: This question is about **what helps or hinders people in complying with high standards on protected sites**. It is not simply asking whether members comply. It is asking what practical factors affect whether requirements can be understood, implemented and maintained.

The MA response identifies several potentially important factors: whether requirements are clear and site-specific; whether different regulatory regimes fit together; whether timescales and permissions are workable; whether evidence requirements are proportionate; whether staff have the right skills and training; and whether there is practical engagement between regulators and land managers.

Useful estate evidence might include:

- **Clarity of requirements** – where Natural England or another regulator clearly identified the protected feature, the risk, the required action and the desired outcome, did that make compliance easier? Conversely, if requirements were unclear, explain exactly what was uncertain.
- **Site-specific requirements** – examples where generic guidance was adapted successfully to local habitat, hydrology, terrain or species requirements may be useful.

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- **Interaction between different regulatory regimes** – protected-site management can involve SSSI consent, Habitats Regulations Assessment, species licences, vegetation-management rules and agri-environment agreements at the same time. If these worked together well, say so. If they duplicated or conflicted with one another, provide a specific example. The MA response identifies regulatory coherence as a factor affecting practical compliance.
- **Timing of decisions** – where management is seasonal, record when an application was made, when permission was received and whether the timing allowed the work to be carried out.
- **Length of permissions** – if a short-duration consent or licence meant that materially unchanged management had to be reconsidered repeatedly, explain the practical effect on planning, staffing or delivery.
- **Continuity** – some habitat or species outcomes require management over several years. Members may have evidence showing whether regulatory certainty helped or hindered that continuity.
- **Skills, labour and equipment** – explain whether the required standard depended on trained staff, specialist equipment, contractors or other capacity and whether these were realistically available.
- **Training** – records of keeper or staff training can help demonstrate how clear operational standards support compliance, particularly for potentially higher-risk activities.
- **Evidence requirements** – if Natural England requested additional information, explain what was requested, whether the evidence gap was clearly identified, how it was resolved and whether this resulted in a workable decision.
- **Monitoring as a route to compliance** – examples where uncertainty was managed through monitoring, mitigation or an agreed change of method may be particularly useful.
- **Early engagement with regulators** – where pre-application discussion or a site visit led to an agreed practical solution, give the example. Equally, documented examples where the absence of timely engagement caused a difficulty may be relevant.
- **Estate knowledge** – long-term keeper or land-manager knowledge about vegetation, hydrology, wildlife, grazing and wildfire may have helped regulators understand the site. Explain how this information was used rather than simply asserting that local knowledge is valuable.

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- **Cost and practical capacity** – if a requirement could technically be met but imposed a significant additional staffing, contractor, monitoring or administrative requirement, quantify it where possible.
- **Examples where compliance worked well** – these are just as valuable as examples of difficulty. Defra is trying to understand which factors actually influence compliance.

The strongest evidence will be specific: avoid turning this question into a general complaint about regulation. Instead of: “*Natural England takes too long to issue consents.*”

A much stronger submission would say: “*We applied on 15 September 2024 for consent to undertake [activity] during the winter management period. Consent was issued on 20 February 2025. Because the work depended on suitable weather and had to cease by [date], only X hectares of the planned Y hectares could be completed.*”

That gives Defra something capable of being assessed.

Likewise, instead of: “*The rules conflict.*” say:

“*Our SSSI consent required [A], while [other licence/agreement] required [B]. We sought clarification on [date], and the consequence was [specific delay/change/cost/outcome].*”

A particularly useful point: separate compliance from environmental outcome

The MA response makes an important distinction here. Formal compliance may be necessary, but Defra should also consider whether the requirement is **practicable and actually protects the relevant feature**. In other words, completing more regulatory process does not necessarily demonstrate a better environmental outcome.

For members, that means it can be useful to show both:

- **Did we comply with the requirement?**
- **Did the intended habitat or species outcome follow?**

Sometimes the answer to both will be yes. Sometimes an estate may have complied fully but monitoring shows that the intended result did not occur. That is relevant evidence too.

How to consider drafting your response

A simple structure would be:

Protected site/feature: [name and feature]

Requirement: [consent/licence/guidance/management agreement]

What helped compliance: [clarity, early engagement, training, long-duration consent etc.]

What made compliance difficult: [if applicable]

Timescale: [application, decision and management dates]

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Practical effect: [what happened on the ground]

Environmental outcome: [if monitored]

Evidence: [consent, correspondence, management records, invoices, maps, monitoring etc.]

Important limitations: [anything Defra should know]

This question is particularly valuable where members can provide real examples showing why a requirement was easy or difficult to comply with, and what practical or environmental consequence followed. Specific dates, documents and outcomes will carry more weight than general views about regulation.

Question 16: What evidence exists of links between grouse shooting, pheasant/partridge release and shooting, and mallard shooting and the spread of disease, including Highly Pathogenic Avian Influenza (HPAI) and other infectious diseases? (Optional)

MA guidance: For many members, this may be a question where there is **little or no evidence to add**. Members should not feel obliged to answer it simply because it appears in the Call for Evidence.

A crucial distinction is that red grouse are wild birds. Disease risks associated with the breeding, transport or release of pheasants, partridges or mallard should therefore not automatically be assumed to apply to red grouse. The MA's response makes this distinction explicitly.

What members might usefully include if you do hold relevant estate-level evidence:

- **Confirmed disease incidents** – for example, records of HPAI or another infectious disease confirmed in birds found on the estate. Give dates, species, location and how the diagnosis was confirmed.
- **Laboratory or veterinary evidence** – APHA results, veterinary reports, post-mortem findings or other formal diagnostic evidence are much stronger than assumptions based on a bird being found dead.
- **Unusual mortality events** – records of clusters of dead or sick wild birds may be relevant, particularly if they were reported, investigated or tested. Be clear if the cause was never established.
- **What happened before and after a disease incident** – for example, whether shooting or another activity was suspended, whether access or handling arrangements changed, and whether further cases occurred.

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- **Biosecurity measures** – if the estate introduced particular procedures because of a known disease risk, explain what they were and why. If you have evidence that those measures affected an identified risk, include it.
- **Long-term observations** – if keepers have systematic records of disease incidents, unexplained mortality or absence of such incidents over a number of years, these may provide useful operational evidence. Explain how consistently those records were kept.
- **Interaction with statutory authorities** – correspondence with APHA, Defra, Natural England or veterinary advisers following an incident can help establish what was actually suspected, tested and confirmed.
- **Evidence distinguishing wild birds from released birds** – where an estate contains both wild red grouse and released gamebirds, be particularly clear which species and activity the evidence relates to.

An important distinction: do not treat finding a dead bird as evidence of disease transmission.

Where possible, distinguish between:

- suspected disease
- confirmed disease
- the presence of infection in an individual bird
- evidence that a particular gamebird activity actually contributed to transmission

The MA response similarly asks Defra to distinguish disease risks associated with breeding and release, disease risks within wild bird populations, the act of shooting itself, and other management or human activities which might affect transmission. That is particularly important because an estate may have evidence that disease **occurred**, without having evidence showing **how it was transmitted**.

Avoid speculation: If you do not have relevant veterinary, diagnostic or recorded operational evidence, it is better to say “No evidence to add” than to speculate about disease transmission.

Personal observations can still be relevant, but they should be described accurately. For example: *“Five dead birds were found between 3 and 10 August 2025. They were reported to [body]. No diagnostic testing was undertaken, so the cause of death is unknown.”*

This is much stronger than: *“The birds probably had avian influenza.”*

Please note: If your evidence concerns medicated grit rather than transmission of infectious disease, Q28 is likely to be the more appropriate place for it.

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Suggested structure of your response might be:

Species involved: [red grouse/other wild bird]

Date and location: [when and where]

What was observed: [illness/mortality/event]

Was disease confirmed? [yes/no]

How was it confirmed? [APHA/veterinary/laboratory report]

Relevant activity at the time: [shooting/management/other]

Evidence of transmission: [if any – do not infer this simply from occurrence]

Action taken: [reporting, biosecurity, suspension of activity etc.]

Outcome: [what subsequently happened]

Supporting evidence: [reports, correspondence, records]

For most members, this question should be answered only where you hold something concrete. Evidence that disease occurred is useful; evidence linking it to a particular activity is stronger; and where the cause or route of transmission is unknown, say so.

Questions 17 to 19: These concern disease risk and standards. We have not reproduced them here because they are unlikely to be relevant to most MA members. If you hold specific evidence, you should of course respond.

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Question 20: What evidence exists of links between gamebird activities and bird of prey crime? (Optional)

MA guidance: Members should respond **only where they hold direct, relevant evidence that they are comfortable submitting**.

The MA's own response deals with the wider scientific, policing and satellite-tag evidence. It recognises that there is peer-reviewed evidence linking illegal killing of hen harriers with grouse-moor/gamebird-management contexts, while also stressing the importance of distinguishing confirmed offences, suspected incidents, statistical associations and unexplained events.

If you do hold relevant evidence, it might include:

- a confirmed wildlife-crime incident on or involving the estate
- direct involvement in, or records from, a police or Natural England investigation
- verified information about the fate of a tagged bird
- documented raptor breeding or monitoring records that provide relevant estate-level context
- records of cooperation with police, Natural England or recognised monitoring schemes where these relate directly to the question

Any response should be factual and should distinguish carefully between **what is confirmed, what is suspected, what is inferred and what remains unknown**. An unexplained satellite-tag disappearance, for example, is not by itself proof of an individual criminal offence, although such data may contribute to wider statistical or population-level evidence.

If you do not hold direct and relevant evidence for this question, simply leave it unanswered or state “No evidence to add”.

Please take particular care with sensitive information. Do not include precise locations of active raptor nests, details of live police investigations or other information that ought properly to remain confidential. If genuinely sensitive evidence is submitted, consider the confidentiality provisions at Q1.

Suggested response format:

Incident or evidence: [brief factual description]

Date/location: [where appropriate]

Status: [confirmed / suspected / unexplained / other]

Authority involved: [police / Natural England / other]

Outcome: [if known]

Supporting evidence: [reference/report/correspondence]

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Question 21: What evidence exists on whether, and how, high standards of practice reduce these risks? (Optional)

MA guidance: Members should answer this only where they have something **direct and useful to add**. Many members may quite reasonably have no estate-level evidence capable of showing that a particular standard has reduced bird-of-prey crime.

The MA's own response says that high standards should form part of reducing risk, but that the evidence does **not** justify claiming that a particular code, assurance scheme or regulatory mechanism has, by itself, caused a measured reduction in offending. The absence of recorded crime after a standard is introduced does not prove that the standard caused that absence.

Useful evidence might include:

- **Documented estate policies or procedures** relating to birds of prey and wildlife law, particularly where these are actively implemented rather than simply existing on paper.
- **Training records** showing that keepers or other staff have received relevant legal or operational training.
- **Management accountability** – for example, written expectations from owners or managers, supervision arrangements or procedures for dealing with breaches.
- **Monitoring and reporting procedures** – where the estate has established systems for recording raptor activity, reporting incidents or cooperating with investigations.
- **Cooperation with police or Natural England** – documented examples of reporting, site access, nest monitoring or other practical engagement.
- **Independent scrutiny or assurance** – where compliance with relevant standards is externally checked or audited.
- **Changes introduced following a concern or incident** – if an estate strengthened procedures, training or supervision in response to a specific identified risk, explain what changed.
- **Long-term outcome information** – where an estate has both evidence of a particular standard being implemented and reliable monitoring over time, this may help provide context. Take care not to claim that the standard caused an outcome unless the evidence supports that conclusion.

The MA response identifies high standards as potentially including clear expectations of lawful conduct, practitioner competence, management accountability, monitoring and reporting, cooperation with regulators and police, and mechanisms for intervening where poor practice is identified. It also stresses that effectiveness should be judged from evidence of implementation and outcomes, rather than merely from the existence of a written code.

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Do not overclaim: evidence that an estate has high standards is not the same as evidence that those standards have reduced wildlife crime.

For example: “All keepers receive annual wildlife-law training and the estate has a written zero-tolerance policy” is evidence that those standards exist and are being implemented.

It is **not**, by itself, evidence that: “Our training has reduced bird-of-prey crime.” This claim would require additional evidence.

The MA response makes essentially the same point: even policing frameworks supporting training, reporting, collaboration and intervention do not by themselves demonstrate that any one measure caused a measured reduction in offending.

If you have records showing how particular standards are actually implemented on your estate, you may wish to provide them. If you cannot evidence their effect on the risk of bird-of-prey crime, say so. If you have no relevant evidence to add, simply leave Q21 unanswered or state “No evidence to add”.

For the relatively small number of members who do answer it, consider:

Standard or procedure: [what is in place]

When introduced: [date]

How it is implemented: [training, supervision, monitoring etc.]

How compliance is recorded: [records/audit/policies]

Relevant outcome evidence: [if any]

What can reasonably be concluded: [keep this proportionate]

Important limitations: [for example, no basis for proving causation]

Questions 22 to 24: These concern animal welfare during and following the release of gamebirds. Because red grouse are wild, these questions will generally not be relevant to MA members unless you have evidence relating to other gamebirds.

Question 25: What evidence exists on the number of birds shot and how many enter the food chain? (Optional)

MA guidance: This is a question where individual estates may have **particularly useful evidence to contribute**, because Defra is asking for factual information that many members already record.

The MA’s own response explains that red grouse are a naturally reproducing wild population, not birds bred or released for shooting. Numbers can vary substantially between years, and decisions about whether and how much to shoot are informed by spring and summer counts and the available

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harvestable surplus. The MA does not itself hold a sufficiently robust national dataset to give Defra a definitive annual total for England or the proportion entering different routes to consumption.

For that reason, **good estate records could be genuinely valuable here**. Useful evidence might include:

- **Annual grouse bags** – ideally provide several years rather than one exceptional season. Include years when little or no shooting took place as well as better years.
- **Number of shoot days** – this helps place annual bag figures in context.
- **Spring and summer grouse counts** – particularly where these show how population monitoring informed the decision whether to shoot and the level of harvest.
- **Years when shooting was reduced or cancelled** – these are useful evidence of how harvest responds to the wild population rather than being fixed in advance.
- **Where the shot grouse went** – if records allow, separate birds sold or passed to a game dealer, retained by the estate or Guns, given to others, supplied directly to local businesses, and any birds that did not enter a route to consumption.
- **Dealer or sales records** – invoices, game-dealer returns or other records may provide particularly clear evidence of numbers entering commercial supply chains.
- **Long-term bag books** – these may be useful even if the estate cannot reconstruct every route into the food chain.
- **Any change over time** – for example changes in bag size, number of shoot days or outlets for grouse.

Provide the numbers you actually have: use recorded figures wherever possible rather than estimates. If a figure is estimated, say so and explain how it was calculated.

Also make clear what the figures represent. For example, state whether an historic bag book records **individual birds, brace or another unit**, and use the same basis consistently.

Several years are better than one

Because wild grouse populations fluctuate substantially, a single year's bag could be misleading. The MA response explains that weather, breeding success, disease, predation and habitat conditions can all affect the wild population, and that summer counts inform both the number of shooting days and whether shooting takes place at all.

We therefore encourage members to provide at least five years if readily available, and longer series where records make that easy. A simple table would probably be the clearest format:

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Season	Spring/summer count available?	Shoot days	Grouse shot	To dealer/commercial outlet	Retained/given for consumption	Other/unknown
2025	Yes	4	[]	[]	[]	[]
2024	Yes	0	0	0	0	0
2023	Yes	6	[]	[]	[]	[]

Avoid false precision. If older bag records show how many birds were shot but not what subsequently happened to every bird, provide the bag figures and say that the onward destination was not recorded.

An important distinction: commercial food chain versus other consumption

The MA response notes that shot grouse may be retained for private consumption, distributed locally or passed into commercial supply chains through game dealers and other outlets, but it does not currently have robust evidence quantifying the proportion through each route.

Where possible, break the figures down by route rather than trying to decide yourself what Defra means by “enter the food chain”.

For example: *420 grouse shot; 300 collected by a game dealer; 80 retained by Guns/estate for consumption; 30 given locally; 10 not recorded.* This allows Defra to apply its own definitions without losing useful information.

Population counts are useful context

We encourage members not just to send bag figures in isolation where they have count data. A particularly useful sequence is:

Spring population → summer productivity/count → decision on shooting → actual annual bag.

The MA response specifically explains that summer counts are used to assess the available harvestable surplus and can lead to shooting being reduced or cancelled in poor years.

So evidence such as: *“Summer counts in 2024 showed poor productivity and the planned shooting programme was cancelled. The annual bag was therefore zero.”* is useful evidence in its own right.

How you might draft your response

Estate/moor: [name if you wish to identify it]

Period covered: [e.g. 2016–2025]

Source of records: [bag book/gamekeeper records/dealer invoices etc.]

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Annual number shot: [preferably table]

Population/count information: [if available]

Number entering commercial outlets: [if known]

Number retained or otherwise consumed: [if known]

Number not entering the food chain/unknown: [if known]

Important limitations: [e.g. older records do not show destination]

This question is one where individual estates can add evidence that the MA cannot provide nationally. If you have reliable bag, count or game-dealer records, please consider submitting them - including poor years and years when no shooting took place, not just successful seasons.

Question 26: What evidence exists on the impact of birds that enter the food chain?

(Optional)

MA guidance: This question is quite broadly worded. Defra places it within the section on the use of natural resources, alongside the number of birds shot, their use within the food chain and waste or disposal. Defra does not define more precisely what it means by the “impact” of birds entering the food chain.

For that reason, members should **not feel obliged to manufacture an answer**. Respond only where you have direct evidence that helps explain what happens to shot red grouse once they are used as food.

The MA’s own response is deliberately limited. It notes that shot grouse may be retained for private consumption, given to others, or enter commercial supply chains through game dealers, butchers, retailers and the hospitality sector. It does not claim to have sufficiently robust quantitative evidence to assess the wider impacts of those routes.

Useful estate evidence might include:

- **Game-dealer records** showing numbers of grouse entering commercial supply chains.
- **Direct supply to butchers, restaurants, hotels or other hospitality businesses**, where quantities or regular arrangements can be documented.
- **Birds retained for private consumption** by the estate, Guns, staff or others, where numbers are recorded.
- **Birds given locally for consumption**, where this can be quantified or evidenced.
- **Changes in demand or outlets over time**, if the estate has records showing that birds are easier or harder to place into the food chain.
- **Practical supply-chain information** – for example, how birds are collected, transferred or processed where this is directly relevant and documented.
- **Evidence showing that harvested grouse are actually utilised as food**, rather than simply assuming that because birds were shot they subsequently entered the food chain.

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Keep Q26 separate from Q25 and Q27.

- **Q25 asks how many birds are shot and how many enter the food chain.**
- **Q26 asks about the impact of those birds entering the food chain.**
- **Q27 asks about waste or disposal.**

So if you only have annual bag figures and dealer numbers, those are principally Q25 evidence. If the evidence concerns birds being discarded or disposed of, that belongs principally under Q27.

Do not stray into unsupported economic claims. Defra says separately that it is commissioning an independent assessment of the economic value of the gamebird sector, outside the scope of this Call for Evidence. So we caution members against using Q26 simply to make broad claims about jobs, local economic value or expenditure unless the evidence directly addresses what happens to birds entering the food chain.

A factual statement such as: *“During the 2025 season, 620 grouse were supplied to [game dealer], of which the estate's records show 180 were subsequently supplied to local hospitality businesses”* is useful evidence.

A general statement such as: *“Grouse shooting supports lots of rural businesses”* belongs elsewhere and is not really an answer to this question.

If you do not hold evidence about the impact of grouse entering the food chain, you can leave Q26 unanswered or state “No evidence to add”. There is no need to repeat the bag figures already provided under Q25.

How you might draft a response

Period covered: [years]

Number of grouse concerned: [if known]

Route into the food chain: [dealer/private consumption/local business etc.]

Evidence of the resulting use or impact: [what actually happened]

Source of evidence: [invoice, dealer record, estate record, correspondence etc.]

Important limitations: [anything that is not known]

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Question 27: What evidence exists on waste or disposal issues associated with shot birds? (Optional)

MA guidance: This is another question where individual estates may have useful practical evidence, but members should answer it **factually and proportionately**.

The MA's own response says it is not aware from its membership of a systemic waste or disposal problem involving shot red grouse, and that members have not reported significant quantities of otherwise usable grouse being discarded because no outlet exists. It also notes that Defra expressly welcomes well-documented operational and experiential evidence.

For members, the most useful evidence is likely to concern **what actually happens to shot grouse that do not enter the food chain**.

Useful estate evidence might include:

- **Whether any shot grouse are routinely discarded** – if not, say so, particularly where this is supported by dealer records, bag records or established disposal arrangements.
- **Reasons why individual birds are excluded from the food chain** – for example damage, contamination, disease concern or another reason making them unsuitable for consumption.
- **Numbers involved** – if you know how many birds were excluded from consumption in a season or over several years, provide the figures.
- **How unsuitable birds are dealt with** – describe the disposal route actually used where relevant and recorded.
- **Game-dealer refusals or rejected birds** – if a dealer has declined birds, explain how many, why and what happened to them afterwards.
- **Years when outlets were difficult to secure** – if this has actually occurred, provide the numbers and circumstances rather than a general statement about market conditions.
- **Evidence that birds are normally utilised** – dealer invoices, collection records or estate records showing that the overwhelming majority of suitable birds enter some route to consumption may help provide context.
- **Any genuine waste incident** – if there has been an occasion when otherwise usable birds could not be placed into the food chain, that is relevant evidence too. Give the scale, date and reason.

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The key distinction: a bird not entering the food chain is not automatically evidence of waste. The MA response distinguishes between birds **appropriately excluded because they are unsuitable for consumption** and otherwise usable birds being unnecessarily discarded because no outlet exists.

So, for example: “Twelve birds were excluded from the food chain because they were badly damaged and unsuitable for consumption” is quite different evidence from: “Twelve otherwise usable birds were discarded because no dealer or other outlet would take them.” Defra should be able to distinguish those circumstances.

Do not overstate the evidence

The MA itself does not claim that unnecessary waste **never** occurs. It says that it does not hold national quantitative data and has not received evidence indicating a systemic problem.

So rather than: “No grouse are ever wasted.” a stronger estate response would be: “Our records for 2021–2025 show 3,840 grouse shot. Of these, 3,790 entered recorded routes to consumption. Fifty were excluded as unsuitable for consumption. We have no record during this period of otherwise usable birds being discarded because no outlet was available.” That is much more useful evidence.

Where members have already completed the Q25 table, Q27 can be quite short.

For example:

Total birds shot: []

Entered commercial/private consumption routes: []

Excluded as unsuitable: []

Otherwise discarded: []

Reason for exclusion/disposal: []

Source of figures: [bag book/dealer records/estate records]

This could avoid members having to repeat a long narrative.

If all suitable grouse are routinely used for food and you have records that help demonstrate this, Q27 provides an opportunity to say so. If you have no records or relevant experience of waste or disposal issues, you can simply state “No evidence to add”.

The strongest evidence will distinguish clearly between responsible exclusion of birds that are unsuitable for consumption and genuine waste of otherwise usable birds. Where possible, give numbers and explain what actually happened rather than making a general claim.

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Question 28: What evidence exists of links between gamebird activities and: (Optional)

- a. use of lead shot;
- b. misuse of medicated products;
- c. antimicrobial resistance;
- d. misuse of pesticides;
- e. other environmental or social impacts.

MA guidance: Defra expressly says respondents should address **only those parts of this question for which they have evidence**. Members should therefore not feel obliged to answer all five headings.

For many members, the most relevant parts are likely to be **28(b) medicated products** and **28(e) other environmental or social impacts**, particularly wildfire. The MA itself does not provide substantive evidence on lead shot or pesticide misuse and is cautious on antimicrobial resistance.

28(a) Use of lead shot

Respond only if you have **specific estate evidence** to contribute. This might include records of ammunition type used, changes in practice, trials of alternatives, or other directly relevant operational evidence.

The MA itself is leaving the detailed technical evidence on lead ammunition to organisations with specialist expertise. Members should do the same unless they hold something concrete and useful. If you have no specific evidence on lead shot, leave this part unanswered.

28(b) Misuse of medicated products

The key point is that Defra asks about **misuse**, not simply use. The existence of medicated grit on a moor is not itself evidence of misuse. The MA response notes that current practice involves veterinary prescription, parasite monitoring, record keeping, withdrawal before shooting and safeguards intended to reduce environmental exposure.

Useful estate evidence could include:

- veterinary prescriptions
- strongyle or worm-count records
- dates medicated grit was put out and withdrawn
- records showing compliance with the withdrawal period
- grit-tray maps and locations
- procedures for removing and disposing of old medicated grit
- records showing trays are kept away from watercourses or other sensitive locations
- evidence of staff training or written estate procedures
- any monitoring of water, vegetation or other environmental effects
- any actual incident of misuse and what was done in response

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Do not simply say “we use medicated grit”. Explain how it is prescribed, monitored, recorded and withdrawn. If you have evidence of misuse, provide it accurately. If you have evidence only of compliant use, make that distinction clear.

The MA response also notes that there are still evidence gaps concerning the environmental fate of flubendazole under UK grouse-moor conditions, so members should not overclaim that compliant use proves there can be no environmental effect.

A response structure might be:

Product used: [if relevant]

Veterinary oversight: [yes/no/details]

Evidence of parasite burden: [records]

Period of use: [dates]

Withdrawal before shooting: [date/method]

Environmental safeguards: [tray location/disposal etc.]

Records retained: [what is available]

Any known problem or incident: [if applicable]

28(c) Antimicrobial resistance

We would advise **not answering this unless you hold genuinely relevant evidence**. The MA response identifies one recent study showing antimicrobial-resistance-related genetic pathways in red grouse microbiota, but that study did not establish that grouse management caused or increased antimicrobial resistance. It also stresses that possible resistance of strongyle worms to flubendazole is anthelmintic resistance, not antimicrobial resistance.

Do not treat resistance to worming treatment as evidence of antimicrobial resistance. If you do not hold specialist veterinary or microbiological evidence, leave this section unanswered.

28(d) Misuse of pesticides

Again, members should answer this only where they have direct evidence. The MA response says it does not hold evidence allowing it to make a sector-wide assessment of pesticide misuse. If a member does respond, useful material might include:

- a confirmed misuse incident;
- investigation or enforcement records;
- documented estate pesticide procedures;
- training and record keeping where directly relevant;
- evidence showing how a specific risk is managed.

Do not use this section simply to state that pesticides are used lawfully. Answer only where you have evidence relevant to misuse or its prevention.

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28(e) Other environmental or social impacts

This is likely to be the **most useful part of this question for many MA members**, particularly where they hold estate-level evidence on **wildfire risk, prevention and response**.

The MA's response treats wildfire as a significant environmental and social issue because it can affect peat, vegetation, wildlife, carbon stores, water quality, infrastructure, neighbouring communities and public safety.

Useful estate evidence could include:

- **Wildfires on or adjoining the estate** – date, area burned, duration and, where known, cause.
- **Vegetation and fuel condition before the fire** – heather age/height, Molinia, litter, dead material or other recorded fuel characteristics.
- **Firebreaks and fuel management** – where cutting, controlled burning, grazing or other management was undertaken specifically or partly for wildfire resilience.
- **Evidence of whether firebreaks worked or failed** – both are useful.
- **Peatland restoration and hydrology** – grip blocking, rewetting, water-table information or restoration work where relevant to fire behaviour.
- **Estate wildfire plans** – written fire plans, maps, access routes, water points and emergency procedures.
- **Personnel deployed during wildfires** – number of keepers or estate staff, hours worked and duration of deployment.
- **Equipment supplied** – ATVs, fogging units, bowsers, pumps, beaters, tractors or other equipment.
- **Response times** – where recorded.
- **Joint working with Fire and Rescue Services or wildfire groups.**
- **Training** – wildfire or prescribed-fire training held by estate staff.
- **Impacts on local communities or infrastructure** – road closures, property risk, smoke, water impacts or public-access restrictions where documented.
- **Recovery after fire** – vegetation, peat, wildlife or restoration records.

The MA response stresses that wildfire resilience is not about claiming that one technique is universally preferable. It identifies hydrology, surface-fuel management, grazing, firebreaks, access, water, surveillance, trained personnel and equipment as potentially relevant components of the overall system.

Estate wildfire evidence could be particularly valuable. If your estate has actually dealt with a wildfire, please consider submitting factual records.

For example: *“During the July 2026 wildfire, eight estate staff assisted for a combined 164 hours. The estate supplied three ATVs, two fogging units and one water bowser. Existing tracks and cut firebreaks were used during containment. The fire crossed one cut line under severe conditions.”*

That is much stronger than: *“Grouse moors are good at preventing wildfire.”*

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The MA response uses some operational evidence of staff hours, equipment and local capability, while carefully distinguishing such evidence from proof that grouse management itself prevented a fire.

How to write your Q28 response: because Q28 contains several distinct issues, we suggest members use separate subheadings:

28(a) Lead shot: [evidence / no evidence to add]

28(b) Medicated products: [evidence / no evidence to add]

28(c) Antimicrobial resistance: [evidence / no evidence to add]

28(d) Pesticide misuse: [evidence / no evidence to add]

28(e) Other environmental/social impacts: [wildfire or other evidence]

Only answer the parts of the question for which you have genuine evidence. For grouse moors, properly documented medicated-grit practice and estate-level wildfire evidence may be particularly useful. Be precise about what was observed, what was recorded and what can reasonably be concluded from it.

Question 29: Are there any additional positive or negative impacts, not covered above, for example recreational benefits? (Optional)

MA guidance: This is a useful opportunity for members to provide **social, recreational and community evidence that has not already been covered elsewhere**. Defra expressly invites evidence on additional positive or negative impacts. Please note that the **economic value of the gamebird sector is being assessed separately**.

This should not become another section on biodiversity, wildfire or economic expenditure. It is better used for evidence about **participation, recreation, community life, wellbeing, rural identity, skills and relationships with other users of the uplands**.

The MA's response identifies these as potentially material social impacts, while recognising that much of the evidence is observational or survey-based and should not be overstated as proof of causation. Useful estate evidence might include:

- **Participation in shoot days** – not simply the Guns, but beaters, flankers, pickers-up, dog handlers, drivers, keepers and other participants. If records exist, give typical or annual numbers.
- **Local participation** – how many participants come from nearby villages or communities, where this is known.
- **Age range and intergenerational involvement** – for example young people beating alongside older participants, where this is a genuine and documented feature of the estate.

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- **Regular participation over time** – individuals or families who have taken part for many years may illustrate the extent to which the activity forms part of local social life.
- **Outdoor recreation and physical activity** – beating, picking-up, dog work and other roles can involve substantial time outdoors and physical activity over upland terrain. The MA response treats this as a potentially relevant recreational benefit.
- **Working with dogs** – organised picking-up and dog work may be an important recreational activity in its own right.
- **Community events or networks connected with the moor** – where these are genuinely linked to grouse-moor activity and can be described factually.
- **Training and practical skills** – examples of young people learning land-management, wildlife, dog-handling, fire-management or other practical skills through participation.
- **Cultural heritage and local identity** – where the estate can provide evidence of long-standing traditions or participation connected with the moor.
- **Wider countryside access or recreation** – for example tracks or paths maintained in connection with moorland management that are also used by walkers or local residents, if this can be evidenced.
- **Negative social or recreational impacts** – temporary noise, disturbance, smoke, access inconvenience, conflict with other users or public-safety concerns should also be included where they have actually occurred.

Numbers are particularly useful

Where possible, we encourage members to turn general observations into simple factual evidence. For example, instead of: *“Grouse shooting brings the community together.”* consider *“During the 2025 season, an average shoot day involved 46 people, of whom 31 lived within 15 miles of the estate. Participants included 14 beaters, 8 pickers-up, 4 flankers, 5 estate staff, 3 drivers and 12 Guns.”*

Or: *“Twenty-three local people took part in beating during the 2025 season; nine had participated for more than ten years and six were under 25.”* That is much more useful to Defra.

Wellbeing evidence needs care

The MA submission cites research associating participation in driven game shooting with higher reported wellbeing, but correctly cautions that this does **not prove that shooting itself caused the difference**. Other factors such as exercise, social interaction, shared purpose and time spent outdoors may contribute.

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We suggest: **personal testimony about enjoyment, companionship, wellbeing or connection to the countryside is relevant experiential evidence, but do not turn personal experience into a general health claim.**

For example: *“I have beaten on this moor for 18 years and regard it as an important part of my social life.”* is legitimate evidence of one person's experience. *“Grouse shooting improves everyone's mental health.”* would go beyond the evidence.

Keep economic evidence separate: Defra is separately commissioning an economic assessment. This question is therefore not principally the place to provide figures for wages, hotel spend, shoot rents or local business turnover.

However, the **social consequences** associated with employment or land management may still be relevant (for example population retention, tied accommodation, continuity of local skills or the role of keepers within community networks) provided members explain the social effect rather than simply quoting expenditure.

Do not forget negative impacts: This question asks for positive and negative impacts. If there are documented occasions when shooting or associated management has caused inconvenience or conflict for other users, these can be relevant too. Examples might include temporary access management, disturbance, smoke or noise complaints, or conflict between recreational users. If the estate changed practice in response, say what was changed and whether the issue was resolved.

Example structure of your response

Impact: [recreation/community/wellbeing/cultural heritage/access/other]

Who is affected: [participants/local residents/other upland users]

Period covered: [dates/years]

Evidence: [participant records, survey, estate records, correspondence, testimony etc.]

Scale: [numbers where possible]

Positive or negative: [or both]

What the evidence shows: [keep this proportionate]

Limitations: [for example self-reported evidence or one estate only]

This question is a good place for evidence that is often missed in national datasets: who actually participates in grouse-moor activity? what they do? how long they have been involved and what social or recreational role it plays locally? Specific estate records and clearly described personal experience are more useful than broad claims about rural communities generally.

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Before you submit

- Check that your figures have a source.
- Don't include unsupported assertions.
- Label supporting documents clearly.
- Make sure each answer carries the Defra question number.
- Consider whether any material is genuinely confidential.
- Submit before midnight on 1 November 2026.

Need help?

Please email agilruth@moorlandassociation.org or join the members' Zoom call at 6pm on Wednesday 30 September 2026.

Andrew Gilruth
21 September 2026

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