



The Moorland Association

Moorland Association Response to the Schedule 2.1 Quarry List Consultation – May 2026

Introduction

This document contains the Moorland Association's submission to the Defra, Scottish Government and Welsh Government consultation on proposed changes to Schedule 2.1 of the Wildlife and Countryside Act 1981.

Schedule 2.1 sets out which wild bird species may be lawfully shot outside their close seasons. The consultation covers a range of proposed changes, including removing some species from Schedule 2.1, extending close seasons for others, and adding woodpigeon to Schedule 2.1 for the first time.

The question numbers and headings used in this document follow the structure of the official government consultation. The response begins at Question 7 because Questions 1 to 6 are administrative questions about confidentiality, respondent details, organisation type and business size. Question 7 is the first substantive question in the consultation.

Some questions are included even where the species concerned is not central to the Moorland Association's upland and moorland remit. Where a species is not a principal upland or moorland quarry or management species, and where we do not hold specific evidence, we have generally not offered a substantive view. This should not be read as support for further restrictions, nor as acceptance that the evidence justifies those restrictions. It reflects the fact that our response is focused on the areas where our members have direct experience and evidence to contribute.

The Moorland Association's response focuses on issues most relevant to our members: moorland and upland land management, sustainable shooting, evidence-led regulation, voluntary restraint, predator and habitat management, and the need for a practical licensing system that supports conservation outcomes.

Across the response, our position is that changes to lawful shooting should be evidence-led, proportionate and clear about whether shooting is actually a material driver of decline. Where the main pressures on a species are habitat condition, hydrology, predation, disturbance, disease, climate or wider land-use change, those issues should be addressed directly.

We support working with government, statutory nature conservation bodies, land managers and shoots to improve the evidence base, including bag data, local observations, habitat evidence and population monitoring. Regulation should not weaken the incentive for members and land managers to continue practical conservation work, responsible shooting, voluntary restraint and evidence gathering.

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7. Considering the reform proposal, are you able to provide any feedback on additional wider impacts to business, competition and trade, skills and training requirements and investment within the sector?

- Yes

The Moorland Association is concerned that some of the proposed changes could have wider consequences for land management and conservation work, particularly where they are based on precaution rather than clear evidence that lawful shooting is affecting conservation status.

The MA accepts that the precautionary principle has a proper role where there is a clear risk of serious environmental harm. However, it should not become a substitute for understanding what is actually driving change in a species' population. In many cases those pressures may include habitat condition, hydrology, land-use change, predation, disturbance, disease, climate impacts and changes in migration patterns.

We would prefer the government and the statutory bodies to work with the GWCT, BASC, land managers and shoots to improve harvest reporting, local observations, habitat monitoring and population evidence before further restrictions are imposed. That approach is more likely to produce practical conservation gains and maintain the confidence of those whose cooperation is needed.

Regulation should also avoid weakening incentives for shoots and land managers to submit bag data, support monitoring schemes, or continue habitat and predator management work that benefits a range of upland and rural species.

The MA is therefore opposed to further restrictions on lawful shooting where the evidence does not show that shooting is causing a conservation problem.

8. If you are a Small and Micro Business (SMB) (qualified as 1-49 employees), are you able to provide any information on impacts, including on additional costs, from the proposed reform?

- No

The Moorland Association is not responding as a small or micro business. It is responding as a representative membership organisation for moorland owners, managers and associated rural interests in England and Wales.

However, many of the businesses and rural enterprises affected by the proposals are likely to be small or micro businesses, including farms, estates, gamekeepers, sporting providers, accommodation providers and other local suppliers. Relevant impacts on those businesses are addressed in our response to Q7 and Q10.

9. If you are a Medium-sized business (50-249 employees), are you able to provide any information on impacts, including on additional costs, from the proposed reforms?

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- No

The Moorland Association is not responding as a medium-sized business. It is responding as a representative membership organisation for moorland owners, managers and associated rural interests in England and Wales.

However, some businesses and rural enterprises affected by the proposed reforms may fall within the medium-sized business category, including larger estates, sporting businesses, land-management enterprises and parts of the rural tourism and supply chain. Where relevant, the MA has addressed broader business, regional and sectoral impacts in its responses to Q7 and Q10.

10. Do you foresee any impacts on business from the proposed reform being different between regions across the UK?

- Yes

Business impacts may differ between regions because shooting activity, species distribution, land-management systems and associated rural businesses are not evenly distributed across England and Wales. Upland, moorland and mixed estate areas may be affected differently from lowland, coastal or primarily arable areas.

For MA members, the most relevant business impacts are likely to arise where proposals affect species associated with moorland, upland or mixed estate management, including common snipe, woodcock and golden plover. In some areas, shooting is linked to wider estate management, keeping, accommodation, hospitality, local services, conservation investment and seasonal employment. Any reduction in lawful shooting opportunity, or uncertainty about future regulation, may therefore have knock-on effects beyond the immediate shooting of the species concerned.

There may also be differences between England and Wales because the consultation proposes different approaches for some species, including common snipe and golden plover. The MA therefore considers that any business impact assessment should be sensitive to national and regional differences, and should not assume uniform effects across all areas.

11. Please select the geographical coverage of your organisation or the area that your response relates to from the following: (Please tick as many as are relevant)

- England
- Wales

4A. Removal of European white-fronted goose from Schedule 2.1 in England and Wales

4A1. Do you agree the European white-fronted goose should be removed from Schedule 2.1 in England and/or Wales?

- Do not know

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- Both nations

The Moorland Association operates in England and Wales and represents principally moorland and upland land management interests. European white-fronted goose is not a principal upland or moorland quarry or management species within our remit, and we do not hold species-specific evidence on its harvest, distribution or conservation status.

We therefore do not provide a substantive organisational response to this question. This should not be read as either support for, or opposition to, the proposed removal of European white-fronted goose from Schedule 2.1 in England or Wales. The MA's substantive comments are focused on species and issues most closely connected with moorland, upland and wider land-management interests.

4A2. Can you provide more recent evidence on the number of European white-fronted goose that are shot in England and/or Wales?

- No

The Moorland Association does not hold recent evidence on the number of European white-fronted geese shot in England or Wales.

4B. Removal of Goldeneye from Schedule 2.1 in England and Wales

4B1. Do you agree the goldeneye should be removed from Schedule 2.1 in England and/or Wales?

- Do not know

If yes which nations?

- Both nations

The Moorland Association operates in England and Wales and represents principally moorland and upland land management interests. Goldeneye is not a principal upland or moorland quarry or management species within our remit, and we do not hold species-specific evidence on its harvest, distribution or conservation status.

We therefore do not provide a substantive organisational response to this question. This should not be read as either support for, or opposition to, the proposed removal of goldeneye from Schedule 2.1 in England or Wales.

4B(i). Extending the Close Season for Goldeneye in Scotland

4B2. Do you agree the close season for the goldeneye should be extended in Scotland to 30 September?

- Do not know

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The Moorland Association operates in England and Wales. We do not operate in Scotland and do not hold Scotland-specific evidence on goldeneye harvest, distribution or conservation status.

We therefore do not provide a substantive organisational response to this question. This should not be read as either support for, or opposition to, the proposed extension of the goldeneye close season in Scotland.

4B3. Can you provide more recent evidence on the number of goldeneye that are shot in England, Scotland and/or Wales?

- No

4C. Extending the Close Season for Pintail in Scotland and Wales

4C1. Do you agree the close season for the pintail should be extended in Scotland to 30 September for below and above the high-water mark?

- Do not know

The Moorland Association operates in England and Wales. We do not operate in Scotland and do not hold Scotland-specific evidence on pintail harvest, distribution or conservation status.

We therefore do not provide a substantive organisational response to this question. This should not be read as either support for, or opposition to, the proposed extension of the pintail close season in Scotland.

4C2. Do you agree the close season for the pintail should be extended in Wales to 30 November?

- Do not know

The Moorland Association operates in England and Wales and represents principally moorland and upland land management interests. Pintail is not a principal upland or moorland quarry or management species within our remit, and we do not hold species-specific evidence on its harvest, distribution or conservation status in Wales.

We therefore do not provide a substantive organisational response to this question. This should not be read as either support for, or opposition to, the proposed extension of the pintail close season in Wales.

4C(i). Removal of Pintail from Schedule 2.1 in England

4C3. Do you agree the pintail should be removed from Schedule 2.1 in England?

- Do not know

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The Moorland Association operates in England and Wales and represents principally moorland and upland land management interests. Pintail is not a principal upland or moorland quarry or management species within our remit, and we do not hold species-specific evidence on its harvest, distribution or conservation status in England.

We therefore do not provide a substantive organisational response to this question. This should not be read as either support for, or opposition to, the proposed removal of pintail from Schedule 2.1 in England.

4C4. Can you provide more recent evidence on the number of pintail that are shot in England, Scotland and/or Wales?

- No

The Moorland Association does not hold recent evidence on the number of pintail shot in England or Wales. Pintail is not a principal upland or moorland quarry or management species within our remit.

The Moorland Association does not operate in Scotland and does not hold Scotland-specific evidence.

4C5. Can you provide evidence on the proportion and destination (for example private domestic consumption, sold, given to third parties, etc..) of shot pintail birds?

- No

The Moorland Association does not hold evidence on the proportion or destination of shot pintail birds. Pintail is not a principal upland or moorland quarry or management species within our remit.

4C6. Can you provide evidence on what is the market price of pintail both wholesale and retail?

- No

The Moorland Association does not hold evidence on the wholesale or retail market price of pintail. Pintail is not a principal upland or moorland quarry or management species within our remit.

4D. Removal of Pochard from Schedule 2.1 in England, Scotland and Wales

4D1. Do you agree the pochard should be removed from Schedule 2.1 in England, Scotland and/or Wales?

- Do not know

The Moorland Association operates in England and Wales and represents principally moorland and upland land management interests. Pochard is not a principal upland or moorland quarry or

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management species within our remit, and we do not hold species-specific evidence on its harvest, distribution or conservation status in England or Wales.

We therefore do not provide a substantive organisational response to this question. This should not be read as either support for, or opposition to, the proposed removal of pochard from Schedule 2.1 in England or Wales.

The Moorland Association does not operate in Scotland and does not provide a Scotland-specific response.

4D2. Can you provide more recent evidence on the number of pochard that are shot in England, Scotland and/or Wales?

- No

The Moorland Association does not hold recent evidence on the number of pochard shot in England or Wales. Pochard is not a principal upland or moorland quarry or management species within our remit.

The Moorland Association does not operate in Scotland and does not hold Scotland-specific evidence.

4D3. Can you provide evidence on the proportion and destination (for example private domestic consumption, sold, given to third parties, etc..) of shot pochard birds?

- No

The Moorland Association does not hold evidence on the proportion or destination of shot pochard birds. Pochard is not a principal upland or moorland quarry or management species within our remit.

4D4. Can you provide evidence on what is the market price of pochard both wholesale and retail?

- No

The Moorland Association does not hold evidence on the wholesale or retail market price of pochard. Pochard is not a principal upland or moorland quarry or management species within our remit.

4E. Extending the Close Season for Common Snipe in England and Scotland

4E1. Do you agree the close season for the common snipe should be extended in England and/or Scotland to 30 September, for reasons of both conservation and animal welfare?

- No
- England only

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The Moorland Association operates in England and Wales and responds to this question in relation to England only. We do not provide a Scotland-specific response.

Common snipe is relevant to moorland and upland land management, including wet moorland, rushy pasture, heathland, wet flushes and other damp habitats. However, common snipe is also a migratory species, and decisions about harvest sustainability should be considered at the appropriate flyway level, not solely through a domestic assessment of breeding distribution or local abundance.

These habitats often depend on active land management, including grazing management, water-level management, rush and vegetation management, and, where lawful and appropriate, predator control. We are concerned that policy should not overlook the conservation contribution made by land managers who maintain suitable breeding and wintering habitat for snipe and other ground-nesting birds. Unnecessary restrictions risk weakening the incentive to continue that wider conservation management, particularly where shooting has not been shown to be a material driver of decline.

The evidence presented acknowledges that the snipe present in the UK in winter are a mix of adult breeding birds, that year's offspring and winter immigrants, and that assessing the impact of hunting on the UK or English breeding population alone is therefore difficult. It also notes that individual origin cannot normally be determined without ringing or stable-isotope analysis, and that better evidence on bag returns, timing of shooting and resident/migrant origin would improve future decision-making.

We are concerned that, in the absence of clearer evidence on the proportion of the English bag made up of resident birds, the temporal distribution of harvest, and the flyway-level population context, the case for extending the close season to 30 September has not been fully demonstrated. Any change should be proportionate to the evidenced impact of shooting, particularly where habitat condition, hydrology, land-use change and climate are also significant factors affecting snipe populations.

A change to the snipe season should not be adopted simply because there are uncertainties in the evidence base. Where uncertainty exists, the proportionate response should be targeted evidence-gathering and adaptive management, not statutory restriction unless shooting is shown to be a material source of conservation pressure.

The MA also notes recent GWCT member survey evidence indicating that 92% of respondents did not shoot snipe before 30 September, and that 32.4% had reduced their snipe bag size. That evidence is directly relevant to the proposal to extend the close season to 30 September. It suggests that voluntary restraint and adaptive self-regulation are already influencing behaviour within the shooting community. In the MA's view, this supports a collaborative adaptive-management approach, rather than immediate statutory restriction.

The best way to gather the information required is to work collaboratively with the sporting community, as has been done in relation to woodcock. Shoots, land managers and sporting organisations are well placed to provide practical evidence on bag numbers, timing, location, habitat use and local abundance. Once that evidence has been gathered and assessed, any changes that are shown to be necessary can be made on a sound basis and are more likely to command support from those affected.

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Moving to statutory restriction before that collaborative evidence-gathering has taken place risks reducing the incentive for those with practical knowledge of snipe, including shoots and land managers, to provide bag data, local observations and habitat evidence.

On the evidence presented, the MA does not consider that members who act responsibly should face a shorter lawful season.

The MA therefore does not support the proposed extension of the close season for common snipe in England on the evidence currently presented. Further flyway-level assessment and improved harvest data, gathered in partnership with the sporting community, should inform any future change to the snipe season in England.

4E(i). Removal of Common Snipe from Schedule 2.1 in Wales

4E2. Do you agree the common snipe should be removed from Schedule 2.1 in Wales?

- No

The Moorland Association operates in England and Wales and responds to this question in relation to Wales.

Common snipe is relevant to moorland and upland land management, including wet moorland, rushy pasture, heathland, wet flushes and other damp habitats. It is also a migratory species, and decisions about quarry status and harvest sustainability should be considered at the appropriate flyway level, not solely through a domestic assessment of breeding distribution or local abundance.

We are concerned that removal from Schedule 2.1 should not inadvertently reduce the incentive for land managers to maintain the wet, rushy and moorland habitats used by snipe and other ground-nesting birds. Where conservation pressures relate principally to habitat condition, hydrology, predation, climate or wider land-use change, policy should support active management of those pressures rather than weaken the connection between responsible shooting and conservation delivery.

The MA does not support the removal of common snipe from Schedule 2.1 in Wales on the evidence currently presented. Removal would be a significant regulatory step and should require clear evidence that lawful shooting is materially affecting the conservation status of the species in Wales or at the relevant flyway level.

The MA further notes recent GWCT member survey evidence indicating that 92% of respondents did not shoot snipe before 30 September, and that 32.4% had reduced their snipe bag size. While this evidence is not Wales-specific, it is relevant to the wider question of whether statutory removal from Schedule 2.1 is a proportionate response. It indicates that voluntary restraint and reduced take are already being practised within the shooting community and should be taken into account before a significant regulatory step such as removal from Schedule 2.1 is adopted.

The appropriate next step should be to improve the evidence base, including bag data, timing of harvest, location, habitat use, local abundance and the resident/migrant origin of birds. The best way to gather that information is to work collaboratively with the sporting community, as has been done

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in relation to woodcock. Shoots, land managers and sporting organisations are well placed to contribute practical evidence.

Once that evidence has been gathered and assessed, any changes that are shown to be necessary can be made on a sound basis and are more likely to command support from those affected. The MA therefore does not support removing common snipe from Schedule 2.1 in Wales at this stage.

4E3. Can you provide more recent evidence on the number of common snipe that are shot in England, Scotland and/or Wales?

- No

The Moorland Association does not itself hold recent evidence on the number of common snipe shot in England, Scotland or Wales. However, the MA draws attention to recent GWCT member survey evidence indicating that 92% of respondents did not shoot snipe before 30 September and that 32.4% had reduced their snipe bag size. This should be considered as relevant practitioner evidence when assessing whether voluntary restraint and reduced take are already occurring.

4E4. Can you provide evidence on the proportion and destination (for example, private domestic consumption, sold, given to third parties, etc..) of shot common snipe birds?

- No

4E5. Can you provide evidence on what is the market price of common snipe both wholesale and retail?

- No

4F. Extending the Close Season for Woodcock in England, Scotland and Wales

4F1. Do you agree the close season for the woodcock should be extended in England and/or Wales to 30 November in order to protect our native breeding population?

- No
- Both nations

The Moorland Association operates in England and Wales and responds to this question in relation to both nations.

Woodcock is relevant to moorland, upland and mixed estate land management. The MA recognises the conservation concern around the resident breeding population and supports the principle that shooting should be sustainable and informed by the best available evidence.

The MA also notes that woodcock conservation is closely linked to woodland structure, woodland edge, damp feeding areas, low-disturbance habitat and wider estate management. Shoots and land managers can have an incentive to maintain and improve these features where woodcock remain a valued quarry species subject to responsible restraint. Policy should therefore be careful not to

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reduce the practical conservation interest and management effort associated with the species unless regulation is clearly shown to be necessary and beneficial.

However, the MA is not persuaded that a statutory extension of the close season to 30 November is necessarily the appropriate next step on the evidence currently presented. Woodcock is a migratory species, and the wintering population in Britain and Ireland includes a substantial number of continental migrants. Decisions on harvest sustainability should therefore be considered in a flyway context and should distinguish clearly between impacts on resident breeding birds and migratory birds.

The MA is concerned that a precautionary approach, if applied too broadly, may move policy away from identifying and addressing the principal causes of decline. The evidence presented identifies woodcock decline as likely to be multi-factorial, including woodland habitat condition, fragmentation, drying of soils, disturbance, predation, climate effects and changes in migration. A statutory change to the shooting season should therefore be justified by clear evidence that it will address a material pressure on the resident breeding population, rather than by uncertainty alone.

We also note that the sporting community has already shown leadership on this issue through voluntary restraint, including the widely promoted practice of not shooting woodcock before December. That approach demonstrates that collaborative, sector-led measures can command support and change behaviour without necessarily requiring immediate statutory intervention.

The MA notes in particular recent GWCT member survey evidence indicating that 89% of respondents do not shoot woodcock before 15 November in Scotland or before 1 December in England and Wales, and that 53.2% have reduced woodcock bag sizes since 2018. This is important evidence that the voluntary moratorium and best-practice guidance are already influencing behaviour. It should be recognised as evidence of self-regulation, rather than treated as a reason to move automatically to statutory restriction.

The best way to secure robust evidence and lasting compliance is to continue working with the sporting community, land managers and shoots to improve information on bag numbers, timing of harvest, location, habitat use and the origin of shot birds. Once that evidence has been gathered and assessed, any further changes shown to be necessary can be made on a sound basis and are more likely to command support from those affected.

The existing voluntary approach should therefore be used as a platform to improve bag recording, timing and location data, and participation in studies on the origin of shot birds, rather than being displaced before that evidence base has been fully developed.

We consider that responsible voluntary restraint should be recognised and built upon, rather than treated as insufficient simply because it is not statutory.

The MA does not support the proposed statutory extension of the woodcock close season in England and Wales on the evidence currently presented. The priority should be to build on existing voluntary restraint and improve harvest and population evidence in partnership with the sporting community before further regulation is introduced.

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4F2. Do you agree the close season for woodcock should be extended in Scotland to 14 November in order to protect its native breeding population?

- Do not know

The Moorland Association operates in England and Wales. We do not operate in Scotland and do not hold Scotland-specific evidence on woodcock harvest, distribution or conservation status.

We therefore do not provide a substantive organisational response to this question. This should not be read as either support for, or opposition to, the proposed extension of the woodcock close season in Scotland.

4F3. Can you provide more recent evidence on the number of woodcock that are shot in England, Scotland and/or Wales?

- No

The Moorland Association does not hold recent evidence on the number of woodcock shot in England or Wales.

The Moorland Association does not operate in Scotland and does not hold Scotland-specific evidence.

We would support further evidence-gathering on woodcock bag numbers, timing and location in partnership with the sporting community, land managers and shoots. The MA also draws attention to GWCT's recent survey evidence that 53.2% of respondents have reduced woodcock bag sizes since 2018, which should be considered alongside formal bag-return data when assessing whether voluntary restraint is changing behaviour.

4F4. Can you provide evidence on the proportion and destination (for example, private domestic consumption, sold, given to third parties, etc..) of shot woodcock birds?

- No

The Moorland Association does not hold evidence on the proportion or destination of shot woodcock birds, including whether they are consumed privately, sold, or given to third parties.

We would support further evidence-gathering in partnership with the sporting community, land managers and shoots where this information is considered necessary for future policy decisions.

4F5. Can you provide evidence on what is the market price of woodcock both wholesale and retail?

- No

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4G. Adding Woodpigeon to Schedule 2.1 in England, Scotland and Wales

4GI. Do you agree to adding woodpigeon to Schedule 2.1 in England, Scotland and/or Wales?

- Yes

If yes:

- England
- Wales

The Moorland Association operates in England and Wales and responds to this question in relation to those nations only. We do not provide a Scotland-specific response.

Woodpigeon is not a principal moorland quarry species, but it is relevant to wider rural land management, crop protection, recreational shooting and harvesting for food. The MA recognises the importance of maintaining effective, practical and timely control of woodpigeon where necessary to prevent serious agricultural damage.

The MA supports, in principle, adding woodpigeon to Schedule 2.1 in England and Wales, provided that the general licence route for crop protection remains available, practical and fit for purpose during any close season.

This support should not be read as support for any weakening of crop-protection control. The MA would oppose any future change that made crop protection slower, more bureaucratic or less available to farmers and land managers.

The proposal has the potential to create a clearer legal distinction between recreational shooting or harvesting for food, on the one hand, and essential crop-protection control on the other. At present, recreational woodpigeon shooting may take place under general licence conditions designed for crop protection. A Schedule 2.1 listing would provide a lawful open season for recreational shooting and harvesting, while retaining general licence control where serious agricultural damage needs to be prevented.

We therefore welcome the government's statement that there are no plans to remove GL42 in England or GL001 in Wales. That assurance is essential. Any close season must not restrict the ability of farmers, land managers and authorised persons to control woodpigeon promptly and effectively where serious damage is occurring or likely to occur.

The MA's support is therefore conditional on three safeguards: first, that crop-protection control remains available under general licence during the close season; second, that any guidance clearly distinguishes recreational shooting from crop-protection control; and third, that the system does not create legal uncertainty, administrative delay or additional practical burdens for land managers.

Subject to those safeguards, the MA considers that adding woodpigeon to Schedule 2.1 could provide greater legal clarity than the current position and would align woodpigeon more closely with

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other species for which recreational shooting and damage-control licensing operate alongside one another.

4G2. Can you provide more recent evidence on the number of woodpigeon that are shot in England, Scotland and/or Wales?

- No

The Moorland Association does not hold recent evidence on the number of woodpigeon shot in England or Wales.

The Moorland Association does not operate in Scotland and does not hold Scotland-specific evidence.

The MA would support proportionate evidence-gathering in partnership with farmers, land managers, shoots and the sporting community, particularly where that evidence is needed to distinguish between crop-protection control and recreational shooting.

Such evidence-gathering should be designed to support a practical distinction between recreational shooting and necessary crop protection, not to make the general licence route more difficult to use.

4G3. Can you provide evidence on the proportion and destination (for example, private domestic consumption, sold, given to third parties, etc..) of shot woodpigeon birds?

- No

The MA does not hold evidence on the proportion or destination of shot woodpigeon. However, we note that woodpigeon is commonly shot both as part of crop-protection activity and for harvesting for food. This underlines the importance of creating a clear legal distinction between recreational or food harvesting activity and control undertaken to prevent serious agricultural damage.

4G4. Can you provide evidence on what is the market price of woodpigeon both wholesale and retail?

- No

The MA does not hold evidence on the wholesale or retail market price of woodpigeon. We would support proportionate evidence-gathering on the economic value of woodpigeon shooting and harvesting, provided this does not add unnecessary administrative burden to farmers, land managers or shoots.

5A. Removal of Coot from Schedule 2.1 in Wales

5A1. Do you agree the coot should be removed from Schedule 2.1 in Wales?

- Do not know

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The Moorland Association operates in England and Wales and represents principally moorland and upland land management interests. Coot is not a principal upland or moorland quarry or management species within our remit, and we do not hold species-specific evidence on its harvest, distribution or conservation status in Wales.

We therefore do not provide a substantive organisational response to this question. This should not be read as either support for, or opposition to, the proposed removal of coot from Schedule 2.1 in Wales.

5A2. Do you agree the Schedule 2.1. status of the coot should not be changed but maintained as it is in England and/or Scotland?

- Do not know

The Moorland Association operates in England and Wales and represents principally moorland and upland land management interests. Coot is not a principal upland or moorland quarry or management species within our remit, and we do not hold species-specific evidence on its harvest, distribution or conservation status in England.

We therefore do not provide a substantive organisational response to this question. This should not be read as either support for, or opposition to, maintaining the current Schedule 2.1 status of coot in England.

The Moorland Association does not operate in Scotland and does not provide a Scotland-specific response.

5A3. Can you provide more recent evidence on the number of coot that are shot in England, Scotland or Wales?

- No

5B. Removal of Golden Plover from Schedule 2.1 in Wales

5B1. Do you agree the golden plover should be removed from Schedule 2.1 in Wales?

- No

The Moorland Association operates in England and Wales and responds to this question in relation to Wales.

Golden plover is relevant to upland and moorland landscapes, and MA does not support removing golden plover from Schedule 2.1 in Wales on the evidence currently presented.

Removal from Schedule 2.1 would be a significant regulatory step and should require clear evidence that lawful shooting is materially affecting the conservation status of the species in Wales or at the relevant population scale. Any change to quarry status should be evidence-led, proportionate and clear about the extent to which shooting is, or is not, a material driver of decline.

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5B2. Do you agree the Schedule 2.1. status of the golden plover should not be changed but maintained as it is in England and/or Scotland?

- Yes

The Moorland Association operates in England and Wales and responds to this question in relation to England only. We do not provide a Scotland-specific response.

The MA supports maintaining the current Schedule 2.1 status of golden plover in England. Golden plover is an upland species, breeding on upland heather moorland, blanket bog and acidic grassland, and is therefore directly relevant to moorland management. The consultation itself states that Natural England does not recommend changing the Schedule 2.1 status of golden plover in England, and that the decline described in Wales does not apply in England.

The evidence presented also indicates that golden plover is shot only in relatively small numbers, with an estimated UK bag of 870 birds in 2016, and that this level is considered sustainable at a UK scale. MA therefore does not consider that the evidence presented demonstrates lawful shooting to be a material source of pressure on golden plover in England.

We also note the wider evidence that grouse moor management can support ground-nesting waders. Research on grouse moors has found positive associations between predator control and abundance of golden plover, curlew and snipe, with particularly strong effects for golden plover and curlew. Golden plover is also associated with open upland habitats maintained through active management, and evidence reviews have described recently burnt heather moorland as a habitat not uncommonly chosen by the species.

Any change to quarry status should be evidence-led, proportionate and clear about the extent to which shooting is, or is not, a material driver of decline. Where the principal pressures relate to habitat condition, predation, disturbance, climate, land-use change or other factors, those pressures should be addressed directly. The MA therefore supports maintaining the current Schedule 2.1 status of golden plover in England.

5B3. Can you provide more recent evidence on the number of golden plover that are shot in England, Scotland or Wales?

No

6. Current species on Schedule 2.1

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6.1 Do you think any other species should be removed from Schedule 2.1 in England, Wales or Scotland?

The Moorland Association operates in England and Wales and responds to this question in relation to those nations only. We do not provide a Scotland-specific response.

The MA does not consider that any further species should be removed from Schedule 2.1 on the evidence presented in this consultation.

Removal from Schedule 2.1 is a significant regulatory step. It should only be considered where there is clear, species-specific evidence that lawful shooting is materially affecting conservation status, and where removal is shown to be a necessary and proportionate response.

In our view, changes to Schedule 2.1 should be evidence-led, proportionate and clear about the extent to which shooting is, or is not, a material driver of decline. Where the principal pressures on a species relate to habitat condition, predation, disturbance, climate, disease, changes in migration patterns or wider land-use pressures, those factors should be addressed directly rather than assuming that removal from Schedule 2.1 is the appropriate solution.

We would also encourage government and the statutory nature conservation bodies to work collaboratively with the sporting community, land managers and shoots to improve evidence on bag numbers, timing, location, habitat use and local abundance before further regulatory changes are proposed. Where changes are shown to be necessary, they are more likely to be effective and supported if they are developed in partnership with those affected.

6.2 Should other amendments (for example an extension or shortening of a close season be made with regard to any other species listed on Schedule 2.1 in England, Scotland or Wales?

The Moorland Association operates in England and Wales and represents principally moorland and upland land management interests. We consider that changes to Schedule 2.1 should be evidence-led, proportionate and clear about the extent to which shooting is, or is not, a material driver of decline.

Where evidence does not demonstrate that lawful shooting is materially affecting the conservation status of a species, we would caution against regulatory changes that imply shooting is a principal driver of decline. In such cases, habitat condition, climate, predation, disturbance, disease, changes in migration patterns and wider land-use pressures should be properly identified and addressed.

We therefore support an adaptive-management approach, under which guidance and, where necessary, regulation are updated in response to improved evidence. This should include better use of voluntary bag returns, practitioner evidence, local population observations, habitat data and evidence from land managers. A precautionary approach should not become a default route to restriction where the evidence base is incomplete. Incomplete evidence should trigger better evidence-gathering, not automatic removal of quarry status or shortening of seasons.

The MA is also concerned that unnecessary restrictions may reduce the incentive for shoots and land managers to submit bag data, undertake monitoring, participate in research, and invest in habitat or predator management measures that benefit quarry and non-quarry species alike. Policy should

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strengthen the link between responsible shooting, evidence-gathering, active habitat and predator management, and conservation delivery, not weaken it.

6.3 Should any other species be added to Schedule 2.1 in England, Scotland or Wales?

The Moorland Association operates in England and Wales and responds to this question in relation to those nations only. We do not provide a Scotland-specific response.

We are not seeking to add further species to Schedule 2.1 simply so that they can be treated as ordinary quarry species. That is not the point. The issue is that the current licensing system is not providing land managers with a practical, timely or reliable means of addressing serious local predation pressure where conservation or stock-protection needs arise.

This is particularly acute on moorland and upland holdings. Ground-nesting birds such as curlew, lapwing, golden plover and black grouse are vulnerable during a short breeding season. If serious predation pressure is only recognised after nests have failed or chicks have been lost, the opportunity to protect that year's breeding attempt has already gone. A regulatory system that can only respond after the damage has occurred is not an effective conservation tool.

This concern is consistent with the findings of the Corry Review (2025), which concluded that Defra's regulatory system is not working as well as it should for nature recovery, is difficult for users to navigate, and needs to focus more clearly on delivering outcomes for nature and the environment.

In theory, individual licensing should provide a lawful route where intervention is justified. In practice, land managers' experience is that licences for species such as buzzard, red kite, raven and certain gull species are exceptionally difficult, and often effectively impossible, to obtain in time. The result is a system that may exist on paper, but does not give land managers a usable tool when conservation harm is immediate and seasonal.

The same point is reflected in the IUCN SSC Guidelines on Human-Wildlife Conflict and Coexistence, which emphasise that wildlife conflicts are best addressed through informed, collaborative and locally grounded processes. A system that is slow, inaccessible and disconnected from practical land management experience does not meet that standard.

The MA's preferred solution is a workable General Licence, or an equivalent statutory mechanism, for tightly defined conservation and stock-protection purposes. It should be evidence-led, proportionate, transparent and subject to safeguards. It should not be a free-for-all, nor should it be framed as recreational shooting. It should be a lawful and practical means of acting before serious conservation or stock losses have already occurred.

In practical terms, the MA is asking the government to consider buzzard, red kite, raven and, where locally relevant, certain gull species for inclusion within a workable General Licence or equivalent statutory mechanism. If that is not forthcoming, those species should be considered for Schedule 2.1 listing with strict close seasons, safeguards and limitations.

The proposal to add woodpigeon to Schedule 2.1 is relevant here. We accept that the circumstances are different: woodpigeon involves crop protection, recreational shooting and harvesting for food. However, the principle is the same. Where the existing legal framework is unclear or impractical,

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government should be prepared to create a better statutory route, provided that necessary control remains available through a practical and timely licensing mechanism.

If government does not consider Schedule 2.1 to be the right mechanism, then the MA urges it to make the individual licensing system genuinely usable for tightly defined conservation and stock-protection purposes. At present, the concern from land managers is that the licensing route often exists in theory but is not timely enough to address immediate, seasonal conservation risks.

The MA therefore asks government to address this issue directly. Either the licensing framework should be made more practical, timely and transparent, or alternative statutory mechanisms should be considered for appropriate abundant species, subject to strict safeguards. The current position leaves land managers without a usable route in situations where action may be needed before serious conservation or stock-protection damage has occurred.

7. Welsh language questions

7.1. What, in your opinion, would be the likely effects of the proposals in this consultation on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

The Moorland Association has no specific evidence to provide on Welsh-language impacts.

7.2. In your opinion, could the proposals within this document be formulated or changed so as to: have positive effects or more positive effects on using the Welsh language and on not treating the Welsh language less favourably than English; or: mitigate any negative effects on using the Welsh language and on not treating the Welsh language less favourably than English?

The Moorland Association has no specific evidence to provide on whether the proposals could be reformulated to have more positive effects on the Welsh language.

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