



The Moorland Association

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For the attention of the Chair and Trustees only

Jonathan Riley
Chair of Trustees
Friends of the Dales (The Yorkshire Dales Society)
Registered Charity No. 515384
Company Limited by Guarantee No. 1822908

12 June 2026

Canal Wharf
Eshton Road
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By email [REDACTED]

Dear Mr Riley,

RE: “EYES ON THE SKIES” – outstanding correspondence and further webinar

1. I write further to my letter of 1 May 2026, to which I have not received a substantive response.
2. Since that letter was sent, Friends of the Dales has proceeded with a further Eyes on the Skies webinar, featuring Dr Ruth Tingay, in May 2026. Having reviewed the transcript and summary of that event, I am concerned that the latest webinar reinforces, rather than resolves, the matters previously raised with the Board.
3. For ease of reference, I attach the transcript of the webinar and a short summary of the passages on which I rely.
4. My concern is not that Friends of the Dales should refrain from campaigning on wildlife crime, nor that it is prohibited from seeking changes to law or policy. Charities may campaign where this properly furthers their charitable purposes. The issue is whether, in this case, the Charity has applied adequate trustee oversight, evidential caution, editorial balance, and public-detriment safeguards when using its platform to promote contentious material about grouse shooting, moorland management, gamekeepers and rural communities.
5. The latest webinar appears to confirm that Eyes on the Skies is being run as an active campaigning initiative directed at legislative and regulatory change. In opening the webinar, you introduced Friends of the Dales as an “independent campaigning charity”, promoted the petition, and stated that the Charity intends to use it to support a letter to Defra ministers later

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this year. The policy asks discussed included notifiable wildlife crime, sentencing guidelines, licensing of game bird shooting, vicarious liability, and regulatory changes affecting landowners and shooting businesses.

6. That campaigning character is important because it strengthens, rather than weakens, the need for clear trustee control, careful presentation of evidence, and safeguards against unfair public detriment.
7. The webinar also included further broad-brush criticism of driven grouse shooting, gamekeepers and moorland management. Among other things, the presentation described driven grouse shooting as a “so-called sport”; characterised aspects of moorland management through a framework of “legal and illegal” predator control; referred to the grouse-shooting industry as having “stuck up two fingers to government and to society”; and stated that if licensing does not work “the inevitable next step has to be a ban on grouse shooting”.
8. Again, my concern is not that a speaker may hold strong views. It is that Friends of the Dales, having already been placed on notice of concerns about fairness, balance, evidential presentation and hostility towards lawful rural workers, appears to have continued promoting material of the same character without visible balancing context, corrective caveats, right of reply, or published safeguards distinguishing lawful land management and lawful gamekeepers from criminal conduct.
9. In the circumstances, I ask the Board to provide a short substantive response within 10 working days addressing the following points:
 - 8.1. Whether the Board, or any trustee committee, approved the May 2026 webinar after receipt of my letter of 1 May.
 - 8.2. What editorial, evidential, reputational and public-detriment review was undertaken before the webinar was hosted and promoted.
 - 8.3. Whether any risk assessment, moderation note, speaker briefing, corrections policy, or balancing note was considered in light of the concerns already raised.
 - 8.4. How the Board satisfied itself that the webinar distinguished adequately between proven criminal conduct, alleged or suspected incidents, lawful moorland management, and lawful gamekeepers as an occupational group.
 - 8.5. Whether Friends of the Dales intends to provide any balancing context, clarification, or right of reply before further promotion of this webinar or the wider campaign.
 - 8.6. Whether the Charity now intends to provide a substantive response to the concerns set out in my previous correspondence.

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10. I would prefer this matter to be resolved constructively. However, the position has now moved beyond a disagreement about policy. The Charity has been placed on notice of governance, evidential, campaigning-compliance and public-detriment concerns; has not substantively answered them; and has continued to promote further campaign material raising similar issues.
11. Unless I receive a substantive response within 10 working days, I will consider referring the matter to the Charity Commission as a concern about trustee oversight, responsible campaigning, accuracy and evidential standards, and potential public detriment to lawful rural workers and communities.

Yours sincerely

Andrew Gilruth

Chief Executive

Moorland Association

agilruth@moorlandassociation.org

Appendix 1 – Friends of the Dales Webinar 3 transcript, May 2026

Appendix 2 – Friends of the Dales Webinar 3 key points

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Appendix I – Friends of the Dales Webinar 3 transcript, May 2026

Friends of the Dales Webinar 3 - Full Transcript

Dr Ruth Tingay

May 2026

Jonathan Riley, Chair of the Board of Trustees at Friends of the Dales

Evening, everyone. I'm Jonathan Riley, Chair of the Board of Trustees at Friends of the Dales. And further welcome from me. It's great seeing so many people here. Thank you. Just before we start, a reminder for anyone who's still new to us, Friends of the Dales is a small independent campaigning charity that stands up for the Yorkshire Dales. It is free of any vested interest. In the 45 years we've existed, we've campaigned successfully on sustainable transport, affordable housing, bringing back wildlife, and restoring nature in the Dales, and ensuring we're resilient in the face of climate breakdown. All of these things, which, of course, impact on people, the wildlife, and livelihoods of communities in the Dales. Recently, in the last few years, we've been on a journey of change, deciding to focus in on the more challenging and big issues facing the Yorkshire Dales, and that journey is embracing new directions and new voices with many young voices and different perspectives now involved with us bringing new energy and direction to what we do, and turning to our campaign, which, which tonight's talk is about Eyes on the Skies, our current and most pressing campaign launched last year. It feels like every week this year we hear of a missing or dead birds of prey in our national parks and across Britain. In fact, another one yesterday. So, just a reminder, the aims of the Eyes on the Skies campaign were very clear to raise awareness about birds of prey and their persecution, to show people what's to do to spot it, and to seek change from government to help stop the crime. I mean, it's been, it's been horrifying, because people have responded overwhelmingly. All our talks have been way oversubscribed. There's been much more interesting what the charity does, people stepping up to support us, and as we speak, nearly 6000 people have signed that petition, and to the petition itself, we're intending to use the petition to back a letter we're going to send to Defra ministers later this year. All this to be very clear is a legitimate part of campaigning when the Charity Commission rules, and perfectly acceptable for an independent campaigning charity like us to seek changes to legislation and regulation from the government of the day. What we're asking for in the petition is and in the letter is for wildlife crimes to be made notifiable, so they're recorded on the National Crime Database, just like other serious crimes. So, police landowners and conservation organizations can focus their resources and work together to target the worst locations. Secondly, we're calling for bespoke sentencing guidelines for wildlife crime to be written urgently, so that judges and magistrates can deliver more appropriate sentences, rather than what we regard as paltry fines, which fail to act as a deterrent, and this is backed by judges and magistrates who've openly said this. And thirdly, we join in others in calling for better regulation on the game shooting industry, in particular licensing, to ensure accountability and to prevent further offenses. Now, of course, this has recently been included in the government

consultation on the draft land use framework, so again, a further sign that we are legitimately supporting kind of things the government are looking at to reduce wildlife crime or eliminate it, so we would love you to sign the petition, and if you haven't already, please do so, and share it to really amplify the case. The campaigns have maximum impact, and just before starting tonight's event, we're always on the lookout for people to come and host, come and deliver a talk, especially experience and practices that are being applied to stop wildlife crime. So, please get in touch if that's something you can do, and so tonight to introduce to Dr Ruth Tingay. Ruth has worked in the field of raptor research conservation for more than 30 years. A former president of the International Raptor Research Foundation, Ruth now focuses on the campaign against the illegal killing of birds of prey in the UK through her blog, Raptor Persecution UK. So, knowing how busy she is, we're thrilled that she's not only speaking for us, but just put her weight behind the campaign and raised awareness of it through Raptor Persecution UK. And huge applause and support to Ruth, your brilliant blog this week, exposing some of the issues here, and what you have to put up with in going about the campaign. That's enough from me. Over to Ruth.

Ruth Tingay

Hi. Thank you, Jonathan, friends and Dales, for inviting me to speak this evening. Can you see my screen? Yeah, yes, we can. Yeah, okay. So, my name is Ruth Tingay. I'm a raptor ecologist, researcher, campaigner, and I write a book called Raptor Persecution UK that started in 2010, 16. years later, unfortunately, still keeps me very busy. I'm going to talk this evening about the recent introduction of licensing for grouse shooting in Scotland. You might be thinking how is this relevant to raptor persecution in the Yorkshire Dales. I think it's very relevant, not least because the long-term persistent and widespread illegal killing of raptors in Scotland was the catalyst for bringing in licensing, and because the Westminster government has just announced in its land use framework for England that it's going to explore options for licensing all game bird shooting in England, not just for grouse, that's including pheasant and red leg partridge. So I thought it might be useful to review how grouse shoot licensing came about in Scotland, and the effort that it took to get there. Usually, when I talk to new audiences about raptor persecution, many will tell me that they knew it was a thing in the Victorian era, but they didn't realize it was still a thing in the 20-first century. Actually, the history of raptor killing in Scotland has been traced back to the 15th century, although it's not considered to have begun in earnest until the late 1700s with the rapid expansion of sheep farming, alongside the popularity of game bird hunting in the 1800s and particularly red grouse shooting, a sporting tradition peculiar to the UK. Most raptor species were considered to be vermin and a significant threat to sheep and game bird survival. As such, legal predator control was permitted during this period, and landowners encouraged their shepherds and gamekeepers to eradicate as many raptors as possible. It was an established culture at the time, no doubt influenced by the shooting interests of the royal family. I think this painting on the screen illustrates the culture quite well. It's called the Highlander, and it was commissioned by Queen Victoria as a Christmas present for Prince Albert in 1850 when they were leasing Balmoral Estate before Prince Albert bought it in 1852 She told the artist Edwin Landseer that the painting should represent the national

sport of the country. It shows one of the Queen's gamekeepers, Peter Coutts, in a Highland snowstorm holding a dead golden eagle. That pretty much says it all, I think. By the early 1900s several species had become extinct in Scotland, including white-tailed eagle, goshawk, red kite, and osprey. Other species in Scotland managed to avoid extinction, but suffered severe range contraction as a direct result of persecution, including the hen harrier, peregrine, golden eagle, and the buzzard, the Legal protection for nearly all birds of prey finally came in with the Protection of Birds Act in 1954. Although the sparrowhawk had to wait until 1961 and then gradually over the following years society's perception of raptors became far more progressive and accepting with reintroduction programs for species such as the white-tailed eagle and the red kite. Further legislation to protect raptors was also introduced during this period, including a complex array of Scottish, UK, and European specific laws. These afforded raptor species the high level of legal protection they now have today, making it an offense to poison, shoot, trap, destroy nests, or recklessly or deliberately interfere with the nesting raptor. However, as I'm sure you're aware, some parts of society never moved on from the glory-filled vermin killing days of the Victorian era. By the 1980s management for driven grouse shooting began to intensify to artificially increase the number of red grouse available to be shot. For those new to this so-called sport, driven grouse shooting is where generally very wealthy people with guns stand inside a shooting butt on an open moorland and shoot at lines of red grouse that are flushed or driven towards them by a team of beaters waving flags. The quality of a so-called successful driven grouse moor is measured by bag size, that just means the number of red grouse that have been shot, and that depends on having an artificially high grouse population to shoot at this is achieved by three main management principles: predator control, that includes legal and illegal, in this case managing the heather structure, which is typically done by rotational burning in patches, and parasite control, typically done by placing medicated grit in plastic trays, right across the moor, intensification of driven grouse moor management developed from the 1980s onwards in a push to maximize commercial yields and capital land values. The value of an estate was related to the number of red grouse shot each year, and that still stands today by the early to mid 1990s the consequences of that intensification of grouse moor management were all too clear and would continue for at least another two decades. This is a newspaper article from the early 1990s highlighting the prevalence of raptor persecution crimes in the grouse moor dominated Monadhliath Mountains to the south of Inverness. Raptor monitoring was being undertaken by the recently formed Scottish Raptor Study Group, and crimes against birds of prey were being cataloged by the RSPB. You can see, if you look, look down that list in the newspaper article, there's quite a lot of killing going on. The illegal poisoning, shooting, and trapping of raptors was rife. It wasn't just the odd incident here and there. The persecution was so intensive and widespread, it was having population level effects on distribution and abundance of several species, including golden eagles, hen harriers, goshawks, peregrines, and later reintroduced red kite, however, the influence of local landowners on policing has been described as being profound at that time, where rural police officers had access to free fishing and shooting, and many gamekeepers worked as special constables, wildlife crime enforcement, unless it related to poachers stealing fish and game, i.e. in the interests of the landowner, was pretty limited, to

say the least. In 1998 the Scottish Raptor Study Group carried out an assessment of the extent of the illegal killing of raptors in Scotland. The report was published by the Scottish Office, and it was launched at an event where Donald Dewar, the then Secretary of State for Scotland, described the level of raptor persecution as a national disgrace. He promised that after devolution the following year the newly created Scottish government would take all possible steps to eradicate

This was big news at the time and signaled the politicization of raptor persecution. Although it turned out that this was actually only the start of a 20 year long can-kicking exercise by successive Scottish governments. It's probably worth pausing at this stage of the story and reminding ourselves what's required to achieve legislative change. This is a simple illustration of how I see the process. You need political support, because ultimately politicians are the lawmakers, but to get political support, you also need scientific evidence to support your argument for change. But scientific evidence on its own is not enough. Carrying out a study and publishing it, publishing it in some scientific journal that most people can't or won't ever access, isn't going to get you very far. The science is crucial, yes, but the evidence needs to be translated into something the public can understand, using plain language, making it relevant and engendering trust by explaining the scientific process that's been used, only then can you progress towards legislative change by way of enabling public campaigning that then hopefully leads back to achieving political support for your goals. I think we've all learned the hard way that this is not a static three point process, it has to go round and round and round so many times to get anywhere near achieving what you want. There's a reason why successful campaigners are always the most tenacious ones. So, where were we? We got to the stage where political interests had been sparked based on evidence of Raptor persecution that had been collected by the Scottish Raptor Study Group and the RSPB. Whilst that was a massive step forward, it was still important to keep collecting the data over the following years to show the politicians that for as long as they remained inactive on this issue, the illegal killing was still going on. The RSPB was publishing annual bird crime reports, where they compiled all the confirmed crimes. As you can see in this map on the left, the orange dots are locations of confirmed raptor persecution incidents in Scotland between 1994 and 2024 and you can see a clear pattern in the central and eastern highlands and the southern uplands, many of these areas are where intensive driven grouse moor management was prevalent. Meanwhile, raptor monitoring data collected by the Scottish Raptor Study Group were analyzed by scientists, and paper after paper after paper was published in scientific journals to show the effect that illegal persecution on grouse moors was having on some key species, especially again golden eagles, hen harriers, peregrines, and red kites. It was also during this period that satellite technology had advanced to a stage that would allow researchers to fit small transmitters to birds, so that their movements could be tracked, and scientists could understand how species like golden eagles were used in the landscape prior to this. Those first three or four years of a young eagle's life were a bit of a mystery. Unexpectedly, satellite tag technology turned out to be a game changer in the fight against raptor persecution, as you'll soon see, the so from around 2010 I'd say that's that's when public campaigning against illegal raptor persecution really started to get going in

Scotland. Combination of things helped to gather momentum. Firstly, there were all the scientific papers that were being published with increasing frequency, but it was also the time when social media took off, where information could be rapidly disseminated and like-minded people could quickly and easily get behind campaigns. We saw the impact of this for events like Hen Harrier Day, where local campaigners organized gatherings right across the UK to highlight the plight of the Hen Harrier, and social media was excellent for gathering support for e-petitions calling for a ban on driven grouse shooting. Books were written about raptor persecution and grouse war management. Protesters came out in force onto the streets of Inverness after the mass poisoning of many red kites near the Black Isle, which actually wasn't linked to grouse shooting, but nevertheless, a banned poison had been used. School children sent drawings of missing satellite-tagged eagles to the First Minister, pleading with her to protect these birds, and the campaign began to encompass other issues too, such as the mass slaughter of mountain hares on grouse moors. The Scottish charity OneKind ran one of the most effective campaigns I've ever seen on this issue. A photograph had been captured of a load of gamekeepers in Cairngorms National Park with a pickup truck full to the brim with bloodied white hares that had been shot that day on the moor. OneKind campaigners reenacted that image with a truck full of hand-knitted toy hares, which they drove to the parliament in a pickup truck, and then handed out the toy hares to MSPs outside the building. It was brilliant, and ultimately this helped. This helped lead to greater protected status for the species, and the annual mass slaughter of 1000s of hares on grouse moors was brought to an end. During this intense period of campaigning, the Scottish government, under a succession of various environment ministers, some of them very good, some of them utterly hopeless, was keen to be seen to be doing something, and there was what looked on the surface to be a lot of political activity alongside strong statements of condemnation and claims that illegal raptor persecution wouldn't be tolerated, but to many of us it just looked like tinkering around the edges with the SNP government not really being brave enough to take on powerful landowning lobby lobby in a way that would be needed for meaningful change the however, in 2016 two significant events happened that, when combined, tipped the Scottish government over the edge and forced them to acknowledge the scale of the issue, and pretty much embarrassed them into taking meaningful action. The Scottish Raptor Study Group, tired of political inaction, took a bold step for them and launched a parliamentary petition calling for a state regulated licensing scheme for game bird shooting. Licensing was seen by some as the more reasonable approach to regulation rather than the petitions during the rounds in England calling for a ban on driven grouse shooting, so by having that level of compromise, it was more likely that the quite conservative SNP SNP government might go for it. Compelling evidence was heard by the Petitions Committee in 2017 and the petition easily progressed through to the next stage in front of the environment committee, these raptor study group volunteers on the left here, who spoke so passionately and convincingly in front of a televised parliamentary committee, were subjected to a barrage of offensive online abuse from a number of gamekeepers and their hangers on, and this hate campaign continues to this day. Meanwhile, the same year the RSPB issued a press release telling the world that between 2011 and 2016 eight satellite-tagged golden eagles had disappeared in suspicious

circumstances, all or close to grouse moors in the Monadhliaths. That's the same area that you saw earlier in this talk. This was a notorious persecution hotspot, and yet again nobody had been held responsible for the presumed killings. The public uproar was palpable, and the then Environment Minister, Roseanna Cunningham felt she had given enough warnings to the grouse shooting industry about cleaning up its act, but it was obvious that the industry was still doing exactly what it liked and effectively sticking up two fingers to government and to society. Roseanna Cunningham took the next tiny but significant step forwards. She commissioned a scientific review into the fates of all satellite-tagged golden eagles in Scotland to see whether that, whether there was a pattern as to where the young birds were disappearing, of course, there was a pattern, she knew it, we knew it, but she needed clear, cold evidence to be able to counter what I call the influential dark forces at the heart of the Scottish government, who are still standing in the way of change, the Predictably, this government-sponsored review coincided with a concerted smear campaign by the grouse shooting industry to undermine the functionality and reliability of satellite tags and the integrity of the highly qualified and licensed researchers who were fitting the tags to eagles again? Unsurprisingly, this smear campaign continues to this day. In May 2017 the findings of the commissioned report authored by two leading experts, Dr Phil Whitfield and Dr. Alan Fielding were published, and they were damning. The Comprehensive and Forensic Review showed that there's 131 Golden Eagle nestlings satellite tagged in Scotland between 2004 and 2016 nearly a third of them, that's 41 eagles, had disappeared in suspicious circumstances or confirmed to have been illegally killed. What was most telling, however, was that many of the suspicious disappearances slash confirmed deaths were clustered in areas of land managed for driven grouse shooting in central and eastern highlands, and not only that, many of these locations had a known history of being long-term raptor persecution hotspots. As someone said at the time, you can hide the bodies, you can hide the tags, but you can't hide the pattern. Environment Minister Roseanna Cunningham had the evidence she needed and knew that it could not be ignored. She was also aware of the Scottish Raptor Study Group's ongoing petition calling for game bird licensing and the wider campaign pushing for a ban on driven grouse shooting in England. Around this time we also had had huge media coverage of one of our young satellite-tagged golden eagles, called Fred, who disappeared next to a grouse moor in the Pentland Hills, just seven miles from the Scottish Parliament building, rather than in some remote glen far from view. You could have seen from the Edinburgh bypass a few days after his disappearance, his tag sent a few signals from 10 miles offshore in the North Sea before finally stopping. It wasn't difficult to work out what happened to him, and given what we now know about the lengths the raptor killing criminals will go to avoid detection, it wasn't a surprise either. Reacting to the findings of the Commissioned review and the public uproar about Fred in May 2017 the Minister announced another review, this time to look at the wider impacts of grouse moor management practices, with the intention to look at options for licensing. This is called the Werritty Review, named after Professor Werritty, who was leading it as the Werritty Review is underway. Something else happened in 2018 Revive was launched. This is a novel coalition of environmental, social justice, and animal welfare groups seeking grouse moor reform in Scotland. The well-attended launch took place in Edinburgh, and Chris Packham

was the keynote speaker. Inevitably, this led to yet another smear campaign by certain elements of the grouse shooting industry, which you won't be surprised to hear continues to this day. Over the next few years, the Revive coalition has attracted a wide audience and supporter base, and has made significant political inroads in the call for grouse moor reform. At the end of 2019 the Werritty Report was finally published two and a half years after it was first commissioned. Its cover was as uninspiring as its content. It highlighted many of the problems associated with driven grouse war management, but crucially it recommended a further five year wait before the introduction of a licensing scheme to allow the grouse shooting industry yet more opportunity to ask the criminals within rather than have regulation foisted on it by legislation. This recommendation was clearly a result of having a number of representatives from the grouse shooting industry serving on the so-called independent Werritty Review Panel. Meanwhile, raptor killing continued in December 2020 a year after receiving the Werritty Review, the then Environment Minister, Màiri Gougeon, announced the Scottish Government's intention to introduce a licensing scheme for grouse shooting without waiting for a further five years, as the Werritty Review had recommended. Nothing happened for almost another year, and then, in September 2021 the Scottish Government published its five year program for government, and it included commitments to deliver the recommendations of the Werritty Review. The Wildlife Management and Muirburn (Scotland) Bill, which was to be the vehicle used by the government to introduce grouse moor licensing, was introduced to Parliament in March 2023 over four years on from the publication of Werritty

Review.

another year later, in March 2024 and after intense debates in parliament, with strong opposition from the Scottish Conservatives, and the SNP's focus shifting, the Wildlife Management and Muirburn Bill was finally passed, and licensing for all types of grouse shooting, not just driven, but also for walked-up grouse shooting, was put in place ready for the opening of the grouse shooting season on the 12th of August 2024. The idea was that a license to shoot red grouse could be amended or withdrawn or revoked by NatureScot if evidence showed that illegal raptor persecution or other relevant wildlife offenses had taken place. Importantly, this was based on the civil burden of proof, i.e. the balance of probability rather than the criminal burden of proof, i.e. beyond reasonable doubt. It was expected that the license would cover an estate's entire land holding, not just the areas where red grouse was shot, because raptor persecution crimes often take place beyond the boundary of the moor. However, in November 2024 just three months after the licenses began, the licenses were significantly weakened after legal threats from the grouse shooting industry were used to successfully sabotage the licensing regime. Instead of now covering an entire estate, it was announced that the license holder could decide on the extent of the area the license covered, specifically the area where red grouse are taken or killed effectively. This could mean simply drawing an arbitrary line around their grouse blocks, denoting the reach of a shotgun pellet, and argue that that is the area where, where they take or kill grouse, and thus that should be the extent of the licensable area. It's ridiculous. In addition to this, the changes made to the license by NatureScot meant that a whole suite of other relevant

offenses listed in the Wildlife Management and Muirburn Act that were supposed to trigger a license revocation, so for example, offenses under the Protection of Badgers Act, the Wild Mammals Protection Act, and others were not covered, which was clearly going against the intent of Parliament when Wildlife and Muirburn Act was voted for. The revised license had created a massive loophole that needed closing off as soon as possible. Thanks to a year of campaigning behind the scenes work, notably by Scottish Greens MSP, Mark Ruskell, and the RSPB. The Scottish Government introduced a proposed amendment during the passage of the Natural Environment Scotland Bill to close off the grouse shooting licence loophole. Despite pushback from the usual suspects, the amendment passed stage three of the bill on 29 January this year, and Natural Environment Scotland Act received royal assent on the 12th of March. The amendment empowers NatureScot, the licensing authority, to propose a different area to which the license is to relate from that described in the licensee's application, and if unable to reach agreement with the applicant on the area to be licensed, NatureScot has the authority to refuse the application. In addition, and more importantly, from my perspective, the existing legislation specified that NatureScot may modify, suspend, or revoke a grouse shooting license if it was satisfied that the license holder or a person involved in managing the land to which the license relates had committed a relevant offense, a wildlife or animal welfare offense, as specified in the act, and these are the important words on the land. The amendment replaces the wording on the land, so that section now reads has committed a relevant offense that supports or benefits the activities permitted by the license, so what that means is that a relevant offense need not have taken place on the specified licensed area for NatureScot to suspend or revoke the license. This is significant, as not only does it reinstate all the other relevant offenses that were lost after NatureScot's botched changes to the license after the legal threat in 2024 but importantly it means that if NatureScot considers an offense has been committed beyond the licensable area, sanctions can still be imposed if the offense relates to grouse moor management, so for example, predator control, that's pretty important. So the new grouse shooting licenses are in place, ready for the start of this year's grouse shooting season on the 12th of August. The big question now is, will it work? Will it finally bring an end to the illegal killing of birds of prey, that's been allowed to go on for so many years. The jury's out on that one. One of the major constraints of the licensing scheme, in my view, is that it only covers the shooting of red grouse. It doesn't cover the shooting of pheasants or red leg partridges. I think this is a potential problem, because we know that in many areas, estate owners are now releasing red leg partridges and pheasants for shooting, so if, for example, the estate isn't shooting red grouse but is shooting red leg partridges, and let's say a poisoned golden eagle is found on that estate, and NatureScot tries to revoke the shooting license as a response, the landowner can simply argue that the license doesn't apply because they're not shooting red grouse. The Scottish government was warned about this potential loophole when the licensing was being drafted, but it decided not to include partridge or pheasant shooting on the license. Instead, said that the situation would be monitored, and if it is found to be an issue, then amendments may be made to the license to cover the shooting of other quarry species, not just red grouse. Ultimately, like any form of regulation, licensing will only be effective if there is robust enforcement, but the bottom line is, if raptor persecution does

continue, and we know that it does, because there are various ongoing investigations and potential prosecutions already, then the inevitable next step has to be a ban on grouse shooting. The Scottish government has nowhere else to go with it. It will take a few years for us to be in a position to evaluate the success or failure of the licensing scheme, but the grouse-shooting industry can rest assured that they are under close scrutiny, and thanks to the efforts of a lot of people over a lot of years, sites like this of a poisoned golden eagle lying dead on the grouse moor in the Cairngorms National Park can be consigned to history. Thank you very much for listening.

Jonathan Riley, Chair of the Board of Trustees at Friends of the Dales

Thank you, Ruth, for that very heartfelt presentation. Certainly, I've seen and learned lots of things there that I wish I didn't have to know. Right, give everyone a few minutes if people want to compose some questions. We've stopped the recording for the purposes of the questions.

lots of thanking hands in the chat, which is good, and comments I mean, whilst we're waiting, Ruth, I guess interested to know what thoughts you've got about how things are going, I mean, I guess it's early days for the new Scottish government. What do you think the prognosis is for the refinements to the system in Scotland?

Ruth Tingay

Well, like I said, it's Scottish Government have only got one place left to go, so if there's evidence collected to show that Raptor persecution is continuing and licensing hasn't been effective in stopping it. Then there'll be a huge push for a ban on driven grouse shooting. There's no question about

Jonathan Riley

it. I'm getting some questions. So, where do you think we are then in relation to situation England and Wales with possibility of licensing?

Ruth Tingay

Who knows? If you'd asked me that couple years ago, just as Labor came in, I'd say we were on the cusp of it happening, but having seen and watched Labour's activities on the environment for the last couple of years, I'm not so sure. I really don't know. It's good that they're consulting about it, as you can see from Scotland. It's a long, long process, and just because they're consulting doesn't mean that they're going to do it, but it's a start, I guess.

Jonathan Riley

Okay, there's a question here about someone's asked, what resources are available with information on the law in understandable terms, and with practical info as to what the public can do when they suspect wildlife crime, but obviously we've included stuff about operationally, but again, interested if you've got anything to add.

Ruth Tingay

Cool, that's that's quite a tricky one, actually. I'm not aware of a single source where you can go and get that information that's that's kept on to date, I might have to come back to you on that

Jonathan Riley

one. Okay, I mean, I've since said we're we've been trying to get information across in campaign with with the National Wildlife crime unit help, as well, about what people could do.

Ruth Tingay

It depends on the level of involvement. If you're talking about how to interpret the various laws, that's really, really difficult. Even for lawyers, they're so complicated, and there are so many of them. That's hard, but if you're wanting information about what you can do if you suspect a wildlife crime, well, that's pretty straightforward. Take, take pictures if you're able to, don't touch anything, and inform the police, and if, if you're, if you're doing that for, if you suspected a raptor has been illegally killed, I'd also recommend reporting it to the RSPB. Some police forces are very good and very quick, will respond very quickly. Other police forces are not so good, some of them won't respond at all. So, if you've got an organization like the RSPB, for example, they're able to go behind the scenes and kind of give the police a nudge and say, you know, what are you doing about this, what's happening?

Jonathan Riley

Just Paul will link on to sort of the crime up in the chat.

Ruth Tingay

Yeah, the RSPB has have a lot. I was, I was sorry, I was caught up on the question about interpreting the law. I can't think of anywhere where that is available.

Jonathan Riley

Yeah, I guess another one for me, just sort of thinking around with the recent consultations on reintroduction of golden eagle, you all seem to come around past the other parts of England anymore. What are your thoughts on that, other than obviously welcoming it? But can they experience in Scotland?

Ruth Tingay

Well, yeah, I have some mixed views, really, in terms of the Golden Eagles coming down into England, the South Scotland Golden Eagle project, where they brought down chicks from further north in Scotland to bolster the population in South Scotland, has done really well, and some of those birds, because they have satellite tags on, you can see that they're going down into England already, and exploring, and I guess the idea behind bolstering the Northern England population, is the same idea that they had for bolstering the population in South Scotland, so it's probably very feasible by my main concern, as you'd expect, would be the level of illegal persecution that happens in Northern England, in those areas where birds

are going to go, so you could argue it shouldn't happen, you shouldn't, you shouldn't be putting birds in danger until the issue has been solved, but then you can also look at the red kite reintroduction that's happened right across the UK. Red kites have been reintroduced for various points over various years, and you could have argued then you shouldn't be doing this because persecution is still an issue, and yes, in some areas persecution is still an issue, but they've been able to release so many, and there are there are enough areas where, where the red kites are not persecuted that the population has been able to be sustainable, so you still got persecution going on in the same old areas, but red kites are back, so you could argue the same for golden eagles. Let's put enough of them out there, so that they can become sustainable, but the cost, it will be at the cost to individual eagles that are going to get killed,

Jonathan Riley

okay. thank you. So, what he's put in the chat about the issue we're pushing on that strong sentencing as called for by magistrates and judges to put sentencing guidelines. What did you know? What was happening in Scotland, and has anything happened relating to the licensing about that, or carried on similarly. They

Ruth Tingay

had a review as penalties for wildlife crime a few years ago. That was part of the what I call the political tinkering around the edges. They did do a review, and they did introduce strong penalties, but as far as I'm aware, none of them have been used yet, and now there's a presumption in Scotland. I'm not sure if it's the same in England, but there's a presumption in Scotland to not issue custodial sentences to young people. I think I think the cut off is is age 26 or under, but don't quote me on that, so you know someone commits an offense and it meets the custodial threshold, if they happen to be 21 years old, they're not going to be sent to prison, they're going to get some community service order or something, so sentencing is really inconsistent, and it's a massive problem. It's a massive problem in England, as well as you've seen with recent cases. I think one of the main problems is that it's so difficult to bring prosecutions because it's difficult to identify the individual that's responsible, especially on a huge grouse moor, where there may be 1112 employees, they all give no comment interviews to the police, so the police can't, the police know that an offense happened there, but they can't identify the individual, and they need to, they need to be able to identify the individual to take it to court, so when these cases do come to court, they're quite rare. They're summary offenses, so they're dealt with in the lower court, you know, the magistrates court or sheriff's court in Scotland, and a lot of these magistrates, they're lay people, they're not formally legally qualified, and they may not have seen any other similar cases, so they won't understand, they won't understand the context of the offense, and how widespread it is across, across the country. They might just see it as a one-off local issue, and just, you know, dispose of it again with a, with a community service, so sentencing guidelines would be helpful, but then they have to be implemented as well.

Jonathan Riley

Yeah, and I think that plays doesn't mean to what we're asking for, but certainly the point you just made about magistrates just not seeing this kind of thing very often. I think that's part of what the National Wildlife Crime Unit is saying about making it a notifiable crime. one aspect, and then big guidelines around that.

Ruth Tingay

There's also been a call for a few years now to have a special environmental court where we where judges are legally, legally qualified, and environmental experts that, that would help massively, not not just for these kinds of other, other offenses as well, related to the environment and wildlife.

Jonathan Riley

Somebody, somebody asked about some of the other sort of points and opinions in this subject about how third to play might die, and obviously things like wind, turbines, etc. I mean, I guess try not to answer the question, but I guess a lot of what you said, and certainly what Mark Harrison said when he spoke, is about better evidence, and hence the work they're doing to try to get better evidence through better reporting, being anything collecting evidence, so again I can see that lots of people try and distract from this by saying what it's all to do with on these turbines and other things, but I'm sort of drawing on what you said as well about data and evidence leading the way, meaning good end of day with birds, sadly, a hill through things that need to win terribly fairly obvious, isn't

Ruth Tingay

it? Well, you think so, and it does happen. There's a lot of work goes on, particularly in Scotland, to site wind farms in areas that are not used so regularly by some species, particularly golden eagles has been a huge amount of work done by Phil Whitfield and Alan Fielding, using the satellite tag data from golden eagles to work out how those eagles use the landscape, which ridges they favor, which ridges they're not really that bothered about, because the wind's not quite right, so that might be a good place to put a wind farm, so you know it's it is a problem in, has been a problem in some countries, particularly in California, in the early days of wind farms, where they put up these structures on the Altamont Pass in California, which is right along the ridge, used as a migration corridor by birds of prey, and it killed 1000s of raptors. That was a long time ago. Things have moved on, but that site is cited repeatedly to me, as you know evidence that that raptors have been killed by wind farms, but just because they're being killed, they were being killed at that particular wind farm in California. It doesn't mean that they're killed at every single wind farm anywhere, you know. There's there's a lot of nuance behind it, but it's quite clear from the evidence that raptor, raptor persecution, illegal killing of birds of prey is what's constraining the populations of a lot of these species.

Jonathan Riley

Quite a few comments and questions back on to the issue of grief. Why aren't more people being prosecuted? I mean, again, anyone who hasn't seen it, and is watching that,

recommend watching the presentation from Mark Harrison from the National Wildlife Crime Unit, which sets out a lot of detail, and also Tate Jennings' presentation about the difficulty of collecting evidence, so I mean, there's an interesting question, why aren't the landowners prosecuted, but I guess that gets the heart of the licensing issue, doesn't it.

Ruth Tingay

Well, they've got vicarious liability in Scotland, that was another thing that Scottish government brought in to try to try and address this issue, but it's I can't remember how many successful prosecutions they find, it might be two since it was brought in here over 10 years ago, and the reason it's, it's so difficult to get a prosecution is because there's a defense that a landowner can put up to a charge of being vicariously liable, and that defense is simply that they were unaware that the offenses were being committed by their employee, and that they've taken all reasonable steps to stop it. So all they've got to do is produce a training manual, you know, written training manual, say, "Look, all my employees have signed up to this. Therefore, you know it's another deal with me, girls, and you can't, you can't take that anyway. So, vicarious liability has not been brilliant in Scotland. There was also one case where they couldn't bring a charge because they didn't, they couldn't identify the owner of the estate, it was the estate was owned by an overseas trust registered either in Cayman Islands or Jersey or something like that, and they couldn't identify the landowner, so they couldn't bring a charge.

Jonathan Riley

I mean, that's, this is a key points for feeding for consultation isn't it on the consultation on licensing.

Ruth Tingay

I think, yeah, I think that's that's why I can't speak to the RSPB, but I imagine that's one of the reasons why they're pushing for licensing, because it means that there will be consequences for the landowner if an offense is committed.

Jonathan Riley

Yeah, lots of quite, quite a few questions or comments about white-tailed eagles, and then the various stories online, some of which may have some something about them, about farming concerns, but that's a good. There is a lot of propaganda.

Ruth Tingay

What you mean, white-tailed eagles don't eat Shetland ponies,

media doesn't help with that, you know. I've got a folder on my laptop where I collect headlines, media headlines about scare stories about about birds of prey, the best one, and I might use this as a title for a book, Red Kite Stole My Hummus, that's so British.

Jonathan Riley

Yes, another question, which sort of links to certainly the recent prosecution in York, are we now starting to see a change where judges and courts view the gathering of evidence and covert surveillance is legitimate to be used?

Ruth Tingay

I think that's, that's a dangerous generalization. It's, yeah, I really don't want to get into that discussion. It's very complicated. It's different in, in Scotland to England. Yeah, let's, let's not go there,

Jonathan Riley

Yes. Just, for everyone watching again. If you haven't seen three previous webinars we've hosted, look on our website, the links are on YouTube. I definitely recommend three excellent and slightly different presentations, previous previously

Sorry, I'm just reading more comments. There's just for your sake, there's lots of really positive comments. Thank you. I'm

I'm commending you for your resilience, which I'm starting to realize myself is quite challenging. Many people are, you know, supporting you in their comments.

Ruth Tingay

Yeah. Sorry, all I would say is I think what I find so horrible is how many people. I mean, we know the British public, we know that, but what's been so horrible gives me that just the 1000s of people joining a campaign sport in this sign of petition, you know, way more than membership, which is great. So it just shows you the feeling out there, which I think, despite all the challenges and challenges, as you mentioned, worth pursuing this

Jonathan Riley

Absolutely, and it's important that what's important about what Friends of the Dales are doing is that it's a local community doing it, it's a local community group, and that can be quite difficult for the shooting industry to, to deal with, as, as you have seen, you know, their responses is very aggressive. I would say quite intimidatory towards you, because they know how powerful having a local community is, having a local community against against these crimes is difficult for them to deal with, so yeah, good on you. So for creating the campaign and putting your head above the parapet, it is not easy.

Thank you for your support. So we'll bring it to a close now. Thank you, everyone, for joining

Appendix 2 – Friends of the Dales Webinar 3 key points

Webinar: Friends of the Dales, Eyes on the Skies webinar featuring Dr Ruth Tingay

Date: May 2026

Subject: Grouse-shoot licensing in Scotland and relevance to England

Purpose of this appendix: To identify passages and themes relevant to the concerns already raised with the Board about trustee oversight, evidential presentation, editorial balance, campaigning compliance, and public detriment. This appendix is a summary of key passages and themes drawn from the transcript. It is not intended to be exhaustive.

1. Charity framing and campaign purpose

At the opening of the webinar, Jonathan Riley, Chair of Trustees, described Friends of the Dales as a “small independent campaigning charity” and described Eyes on the Skies as the Charity’s “current and most pressing campaign”.

He stated that the campaign’s aims were to raise awareness of birds of prey and their persecution, explain what people should do when they suspect wildlife crime, and “seek change from government to help stop the crime”.

Mr Riley promoted the campaign petition, stated that nearly 6,000 people had signed it, and said the Charity intends to use the petition to support a letter to Defra ministers later in the year. He encouraged attendees to sign and share the petition to “amplify the case”.

Mr Riley also stated that this was, in the Charity’s view, a legitimate part of campaigning under Charity Commission rules and acceptable for an independent campaigning charity to seek changes to legislation and regulation.

Governance relevance: This confirms that the webinar was not merely neutral educational content. It formed part of an active public campaign seeking legislative and regulatory change. That makes trustee oversight, evidential caution, balance, and public-benefit/public-detriment assessment particularly important.

2. Policy and lobbying asks promoted during the webinar

The policy asks discussed during the webinar included:

- Wildlife crimes to be made notifiable on the National Crime Database.
- Bespoke sentencing guidelines for wildlife crime.
- Better regulation of the game shooting industry, in particular licensing.
- Licensing of all game bird shooting in England, expressly including pheasant and red-legged partridge shooting, not only grouse shooting.
- Closure of what was described as an “arbitrary line around grouse blocks” loophole.
- Licences to cover the whole estate, rather than only areas where red grouse are shot.
- Vicarious liability for landowners, albeit with discussion of perceived limitations of the Scottish model.
- Reference to a specialist environmental court.

Governance relevance: The issue is not the fact of campaigning itself, but whether the trustees can show that the campaign remains ancillary to, and in furtherance of, the Charity's purposes; that it is not being pursued as an independent political purpose; and that appropriate controls exist to prevent the Charity's platform being used simply to promote the views of individual speakers, trustees or staff.

3. Direct criticism of driven grouse shooting and the shooting sector

Dr Ruth Tingay described driven grouse shooting as a "so-called sport" in which "generally very wealthy people with guns" shoot birds driven towards them.

She characterised intensification of grouse moor management from the 1980s as being driven by a push to "maximize commercial yields and capital land values".

She stated that the grouse shooting industry had been "still doing exactly what it liked" and "effectively sticking up two fingers to government and to society".

She referred to "influential dark forces at the heart of the Scottish government" when describing opposition to change.

She described the Werritty Review as compromised by the presence of "representatives from the grouse shooting industry serving on the so-called independent Werritty Review Panel".

She said the Scottish licensing regime had been "significantly weakened after legal threats from the grouse shooting industry were used to successfully sabotage the licensing regime".

Governance relevance: These statements are strongly adversarial and go beyond a neutral explanation of policy development. The issue is not that a speaker may hold strong views, but whether the Charity applied adequate moderation, balancing context, or caveats when hosting and promoting such material.

4. Statements about gamekeepers

Dr Tingay's historical framing linked modern raptor persecution to a Victorian "vermin killing" culture and said that "some parts of society never moved on" from that period.

She stated that rural wildlife crime enforcement had historically been limited because of landowner influence, free fishing and shooting for police officers, and because "many gamekeepers worked as special constables".

She said that Scottish Raptor Study Group volunteers who gave parliamentary evidence were "subjected to a barrage of offensive online abuse from a number of gamekeepers and their hangers on", and that "this hate campaign continues to this day".

In discussing why prosecutions are difficult, she referred to "a huge grouse moor, where there may be 11, 12 employees" and said "they all give no comment interviews to the police", making it difficult to identify an individual offender.

Governance relevance: These remarks risk reinforcing a broad suspicion of gamekeepers as an occupational group. The concern is whether the Charity took sufficient care to distinguish proven

criminal conduct, alleged or suspected incidents, and sector-wide policy criticism from the position of lawful gamekeepers and rural workers.

5. Statements about moorland management practices

Dr Tingay described the “three main management principles” of driven grouse moor management as predator control, heather management, and parasite control through medicated grit.

Predator control was described as including “legal and illegal” control.

Rotational heather burning was grouped with predator control and medicated grit as part of the intensification of grouse moor management.

The presentation referred to “the mass slaughter of mountain hares on grouse moors” and discussed the use of imagery showing a pickup truck full of dead mountain hares as a campaign moment.

Predator control was repeatedly discussed in a way that placed lawful and unlawful activity in the same frame.

The webinar does not appear to acknowledge the conservation, wildfire-risk management, access management, peatland restoration, wader-conservation, employment or local economic functions that MA members would say are delivered through lawful grouse moor management.

Governance relevance: This is relevant to the concern that lawful land management practices may be blurred with criminality or presented without sufficient distinction. Where a charity is addressing contentious rural issues, careful differentiation between lawful management, disputed policy, and criminal conduct is important.

6. Reliance on pattern, inference and satellite-tag disappearance evidence

Dr Tingay used the line: “You can hide the bodies, you can hide the tags, but you can’t hide the pattern.”

She discussed satellite-tagged golden eagles and suspicious disappearances, including the finding that many suspicious disappearances or confirmed deaths were clustered in areas managed for driven grouse shooting.

She described one young golden eagle, Fred, as having disappeared near a grouse moor and said: “It wasn’t difficult to work out what happened to him.”

Governance relevance: The material relies in part on inference from patterns, proximity and suspicious disappearance data. Such evidence may be relevant to policy debate, but in a charitable educational/campaigning context it requires careful caveating so that suspicion, inference, confirmed crime and proven individual responsibility are not conflated.

7. Licensing linked to a possible ban

Dr Tingay stated that licensing will only be effective if robustly enforced.

She then said that if raptor persecution continues and licensing does not stop it, “the inevitable next step has to be a ban on grouse shooting. The Scottish government has nowhere else to go.”

She concluded by saying that the grouse-shooting industry is “under close scrutiny”.

Governance relevance: This presents licensing not simply as a regulatory safeguard but as part of a pathway that may lead to a ban on grouse shooting. That is a significant campaigning proposition and is relevant to the Charity’s need to distinguish educational discussion from advocacy for major regulatory or prohibitory change.

8. Continuation of previous webinar themes

During the Q&A, Mr Riley referred attendees back to previous Friends of the Dales webinars, including the presentation by Mark Harrison of the National Wildlife Crime Unit and other presentations on evidence-gathering and wildlife crime.

He described the earlier webinars as “excellent” and encouraged viewers to watch them.

Governance relevance: This indicates that Webinar 3 was not a standalone educational talk but part of a continuing Eyes on the Skies campaign series. That is relevant because the Charity had already been placed on notice of concerns arising from previous webinars.

9. Adversarial framing in closing exchanges

Near the end of the webinar, Dr Tingay said that what Friends of the Dales is doing is important because it is a “local community group”. She said that this is “quite difficult for the shooting industry to deal with” and described the shooting industry’s responses as “very aggressive” and “quite intimidatory”.

Mr Riley thanked Dr Tingay for her support and referred to the challenges faced by the campaign.

Governance relevance: This reinforces an adversarial framing between Friends of the Dales and the shooting sector. It is relevant to the previously raised concern that the campaign may contribute to community division rather than balanced public education.

10. Moderation, balance and right of reply

The transcript does not appear to show any meaningful balancing intervention, right of reply, or corrective caveat from the Chair in response to broad and contentious statements about driven grouse shooting, gamekeepers, landowners, predator control, moorland management, satellite-tag disappearances, and the shooting industry.

Nor does the transcript show a visible attempt to distinguish clearly between:

- Proven criminal offences;
- Alleged or suspected incidents;
- Inferences drawn from patterns or proximity;
- Lawful moorland management;
- Lawful gamekeepers and estate workers;
- Wider policy arguments about regulation or licensing.

Governance relevance: This is significant because Friends of the Dales had already been placed on notice of concerns about fairness, balance, evidential caution, reputational harm, and public detriment. The latest webinar appears to continue the same campaign approach without visible safeguards.

11. Public benefit and public detriment concerns affecting lawful rural workers and communities

Lawful estates, gamekeepers, employees, contractors and local rural businesses may be particularly concerned that the webinar repeatedly frames driven grouse shooting, grouse moor management and the shooting sector in broad adversarial terms, without clearly distinguishing between lawful estates, lawful gamekeepers and proven criminal conduct.

The webinar also appears to discuss licensing not merely as a regulatory safeguard, but as a potential step towards wider restriction or prohibition of grouse shooting. Dr Tingay stated that if licensing does not stop raptor persecution, “the inevitable next step has to be a ban on grouse shooting”. This is likely to be of direct concern to lawful estates whose businesses, employees, contractors and local economies depend on grouse moor management and shooting.

In addition, the webinar’s treatment of predator control, moorland management and gamekeeping may be understood by some viewers as placing lawful land management practices in the same frame as criminal conduct. That is significant because lawful predator control, vegetation management, wildfire mitigation, peatland restoration, access management and species monitoring are all routine aspects of professional moorland management.

The concern is therefore not simply reputational. The webinar appears to support a public campaign for regulatory change affecting their land, businesses, employees and contractors, while presenting contested matters in a way that may not adequately recognise lawful management, conservation delivery, rural employment, community benefit, or the distinction between criminal offences and legitimate land management.

12. Charity Commission relevance

The points above are relevant to the Charity Commission because they raise questions about trustee oversight and responsible campaigning, rather than merely disagreement with the Charity’s policy position.

The relevance of these points is not simply whether the Charity was entitled to campaign, but whether trustees can demonstrate that they made an informed, properly recorded decision about the campaign’s purpose, evidence base, risks, public benefit and possible public detriment.

In particular, they may assist in considering whether the trustees can demonstrate that:

- the campaign was approved and reviewed as part of the Charity’s purposes and public benefit;
- political or campaigning activity remained ancillary to those purposes and did not become an end in itself;
- the evidence base for public claims was sufficiently checked, caveated and presented fairly;
- reputational and public-detriment risks were identified and managed;
- the Charity distinguished clearly between proven criminal conduct, suspected incidents, lawful land management, and lawful rural workers;

- appropriate moderation, speaker briefing, balance, complaints and corrections procedures were in place;
- any trustee, staff or speaker roles were managed so that the Charity was not used simply as a platform for personal or sectoral political views.

13. Overall relevance to the Moorland Association's concerns

The May 2026 webinar appears to reinforce the concerns previously raised with the Board. It confirms that Eyes on the Skies is being conducted as an active campaign seeking legislative and regulatory change. It includes strong criticism of driven grouse shooting, gamekeepers, moorland management and the shooting industry. It relies in part on inference from patterns, proximity and suspicious disappearances. It does not appear, from the transcript, to include balancing context, right of reply, or visible safeguards to avoid unfairly associating lawful gamekeepers and land managers with criminality.

The webinar is therefore relevant to the questions already put to the Board about trustee oversight, editorial standards, evidential presentation, campaigning compliance, and possible public detriment.