



# A MANIFESTO FOR SUSTAINABLE SHOOTING SPORTS

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SENEDD ELECTIONS 2021





## Overview

Shooting is an integral part of Wales' cultural, economic and environmental fabric. Today, the country is home to some 50,000 people in possession of a firearm or shotgun certificate.

Across Wales, a diversity of shooting sports supports tourism and hospitality businesses throughout the year and provides rural communities with an economic lifeline by extending the tourism season into the winter months. Research suggests shooting activities in Wales contribute £75 million to the UK economy. In 2014, there were 2,900 shooting-related businesses across the country directly supporting the equivalent of 2,400 full-time jobs<sup>1</sup>. These contributions are critical – without them, many fragile rural communities would struggle to survive.

In addition, the management practices associated with shooting play a pivotal role in protecting ecosystems and helping wildlife to thrive. Across Wales, shooting contributes to an annual spend of £7.4m on conservation, which is the equivalent of 490 full-time jobs or 120,000 conservation work days.

We now face unprecedented environmental challenges associated with the climate emergency. Shooting practitioners and communities – both recreational and professional – are equipped with unique skills to tackle these issues head-on. Moorland restoration and wildlife management are just two areas in which the shooting community has considerable experience and potential that are sometimes underused.

Despite the numerous virtues and opportunities that are obvious to those involved in shooting sports, we recognise that there are some who remain unconvinced about shooting's place in contemporary Wales. Some perceive shooting to be a beacon of exclusivity, while others question the environmental credentials of associated management practices. These increasingly widespread misconceptions highlight the need for us – as the leading representative body for shooting – to do more to communicate how we will guarantee a sustainable future and deliver a net gain for biodiversity.

In 2020, we surveyed our members on conservation activities and attitudes. The survey revealed that over half fed songbirds during the winter months on their shooting land, and over a third actively managed woodland for both shooting and conservation. Their most pressing environmental concerns were climate change, habitat and biodiversity loss, and building development and infrastructure.

<sup>1</sup> **PACEC (2014)** The Value of Shooting: The economic, environmental and social benefits of shooting sports in the UK. Commissioned report for UK shooting and countryside organisations. Available at [shootingfacts.co.uk/pdf/consultancyreport.PDF](https://shootingfacts.co.uk/pdf/consultancyreport.PDF)





BASC is doing much more than just ensuring correct understanding of those who shoot. We lead and galvanise those around us, as evidenced by the UK's shooting organisations coming together last year to announce a voluntary transition away from lead and single-use plastics in shotgun ammunition for live quarry shooting by 2025.

In this manifesto ahead of the 2021 Senedd Elections, we highlight our policy recommendations for shooting sports, which we believe should be adopted and endorsed by Wales' political parties. We make these recommendations in good faith and with an open invitation to discuss them with elected representatives, parliamentary candidates, policy-makers and stakeholders.

The Welsh countryside is a complex place with a diversity of interests, and traditional land uses are facing unrelenting calls to justify their own existence. We want this to change. We are confident that our policy proposals show why shooting is compatible with an increasingly diverse countryside.

Thank you for taking the time to read this manifesto.

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## Summary of policy proposals

- 1. Sustainable sporting shooting for Wales**  
– health and wellbeing
- 2. Protecting sustainable sporting shooting and its role in Wales' rural economy**
- 3. Sustainable moorland/peatland management**
- 4. Species conservation management**



# 1. Sustainable sporting shooting for Wales – health and wellbeing

## Introduction

A wide range of people live and work in the Welsh countryside. Among them are those who facilitate shooting sports. From gamekeepers to pest controllers and conservation workers, these rural professionals – there are currently around 490 directly employed in the shooting sector in Wales – are highly skilled and resolutely dedicated to our countryside and the wildlife that lives there. There are currently 38,928 shotgun certificate holders and 11,540 firearms certificate holders in Wales.

The Wellbeing of Future Generations (Wales) Act 2015<sup>2</sup> is about improving the social, economic, environmental, and cultural wellbeing of Wales. It ensures Wales' public bodies work collaboratively to give current and future generations a good quality of life. Shooting contributes towards the seven wellbeing goals:

**1. A prosperous Wales** – There is a £75 million annual benefit to the Welsh economy from shooting. Game shooting provides employment opportunities throughout Wales, ranging from gamekeeping roles to the beaters and pickers-up on shoots. It also allows the local hospitality industry to thrive through the winter months. The various shooting disciplines in Wales attract tourists from both the UK and overseas. Many of these make regular return visits after sampling what Wales has to offer.

**2. A resilient Wales** – 380,000 hectares of Welsh countryside is influenced by shooting. Game shoots and BASC-affiliated wildfowling clubs and syndicates undertake large amounts of conservation work throughout the year. This work varies from single-species action plans to landscape-scale habitat management, and site-specific wardening to litter picks and monitoring initiatives. Examples of the latter include those on the Dyfi and the plight of the Greenland white-fronted goose (GWfG), where wildfowling led the way to help conserve the species. Another example is heather burning, which helps create a natural mosaic of heather, providing both food and shelter for red-listed bird species such as the curlew.

<sup>2</sup> **Well-being of Future Generations (Wales) Act 2015.** Available at [legislation.gov.uk/anaw/2015/2/contents/enacted](https://legislation.gov.uk/anaw/2015/2/contents/enacted)

The use of lead and single-use plastics in shotgun ammunition is one such area where we have taken action to enhance our already high standards. The use of lead shot is currently prohibited by law on the foreshore and over wetlands in Wales, and there has been growing concern about the environmental implications of using lead shot and single-use plastic wads over other habitats. With this in mind, we are no longer of the view that the use of lead and single-use plastics in shotgun ammunition over any habitat is synonymous with our sector's long-established environmental credentials. As such, we are actively promoting a voluntary transition towards sustainable ammunition by 2025.

**3. A healthier Wales** – Sustainable sporting shooting and its associated conservation and management activities have a positive effect on both mental and physical health. They provide people with the opportunity to socialise during the harsh winter months and bring remote communities together. Shooting provides regular exercise for its participants by offering the chance to walk in the countryside, work dogs and reconnect with nature. Clay grounds, shooting clubs, rifle target clubs and facilities also play a vital role, not only in local rural communities, but by offering participants a wealth of physical and mental wellbeing benefits.

**4. A more equal Wales** – Countryside sports help to bring people together from all backgrounds, age groups and circumstances, leading to a better understanding of the Welsh countryside and improved community spirit in rural Wales.

A survey undertaken by BASC, Countryside Alliance, Game Farmers' Association and National Gamekeepers' Organisation<sup>3</sup>, has revealed the shocking statistic that almost two-thirds of gamekeepers across the UK have received abuse and threats as a direct result of their profession. With over 1,000 responses, the survey undertaken at the end of 2020 produces a snapshot of the national picture. The findings highlight:

- Nearly two-thirds (64%) of gamekeepers have experienced abuse and/or threats because of their occupation.
- Abuse via social media channels is a rising issue for gamekeepers, with 56% of respondents recording an increase in the number of incidents over the last 12 months compared to previous years.
- Respondents who have been targeted also recorded increases in physical (32%) and verbal (37%) abuse.
- Some gamekeepers also reported that the pressure of being targeted for doing their job has led directly to the breakdown of personal relationships.

Across various organisations, it is agreed that gamekeepers play a pivotal role in moorland and peatland management. Their predator control work is recognised as being paramount to the success of many bird species in Wales. BASC intends to work with government and devolved administrations to raise awareness of the findings and ensure gamekeepers have all the resources available to them to ensure they are protected at their workplace

**5. A Wales of cohesive communities** – Shooting helps to inspire people to get involved with conservation and voluntary work, and brings rural communities together through conservation projects, shoot days and other activities in rural Wales.

**6. A Wales of vibrant culture and thriving Welsh language** – the Welsh culture and language is echoed through the Welsh shooting sector. The tales of the Mabinogion have numerous references to the hunting of wild game and BASC celebrates its unbroken inheritance down the generations. Harvesting game from the Welsh countryside is a tradition that has been passed down from generation to generation. Future generations should not be denied of this ancient tradition.

**7. A globally responsible Wales** – Conservation work delivered by the shooting community has wide-ranging positive benefits for the flora and fauna of Wales and contributes to wider international conservation goals.

<sup>3</sup> **BASC (2020) Gamekeeper Survey 2020.** A report run in partnership with the Countryside Alliance (CA), Game Farmers' Association (GFA) and the National Gamekeepers' Organisation (NGO). Available at [basc.org.uk/gamekeeper-survey-reports-alarming-increase-in-abuse](https://basc.org.uk/gamekeeper-survey-reports-alarming-increase-in-abuse)

# Policy proposals

## 1.1 – Recognise and understand all sustainable shooting as a beneficial physical and mental wellbeing activity.

One of the key health issues facing the Welsh population is mental health, which according to Public Health Wales costs society in Wales £7 billion a year<sup>4</sup>. The Public Health (Wales) Act 2017<sup>5</sup> places a duty on the government to tackle obesity and associated illnesses which cost the Welsh NHS circa £73 million a year<sup>6</sup>. We would like to see the Welsh Government acknowledging the major physical and mental health benefits that all shooting disciplines offer. In the winter months, for example, shooting brings communities together when support is most needed. Shooting also encourages new people to get involved with outdoor activities and exercise. Many respondents felt that curtailing or prohibiting shooting in any way would have a negative impact on the mental and physical health of current and future participants.

## 1.2 – Acknowledge and appreciate the economic and health value of Welsh game meat.

One of the main benefits of eating game meat is that it is one of the healthiest meats available, as it is very low in fat and cholesterol. We would like the Welsh Government to understand this and support new schemes that aid the production and processing of game meat in Wales. According to research, there has been an increase in the demand for game meat among consumers, resulting in the emergence of the game meat market in several developed countries in Europe.

## 1.3 – Cross-party endorsement and support for the voluntary transition away from lead and single-use plastics in shotgun ammunition for live quarry shooting by 2025.

With the transition now entering its second year, we are of the view that political parties should publicly support the collective effort to transition towards sustainable ammunition. We believe that the voluntary transition has the capacity to expand public consumption of healthy game meat, which is currently limited by concern among some major retailers about stocking game shot with lead. The transition could, by extension, cultivate significant socio-economic and public health benefits in the future. Raising the profile and increasing awareness of the transition is an important part of ensuring its success, and we strongly believe this is an important initiative that our elected representatives should take an interest in and actively support.

## 1.4 – Wider protection and education to reduce gamekeeper abuse and targeted negative interference towards legitimate rural businesses.

The Westminster environment secretary, George Eustice MP, said: “Gamekeepers do vital work as custodians of the land. They play an important role in the shooting industry, which delivers significant benefits to rural economies. Any form of abuse or intimidation is wholly unacceptable, and those responsible should feel the full force of the law. We will take the findings of this report on board.”

We ask that the Welsh Government does the same, help stop this abuse and recognise and support the valuable contributions made by gamekeepers/moorland managers/etc. to wildlife conservation and rural life in general.

Business and education support will be required to help inform urban Wales on how and rural Wales is managed.

<sup>4</sup> **Future Generations Commissioner for Wales (2019)** A journey to a healthier Wales. Available at [futuregenerations.wales/wp-content/uploads/2019/11/FINAL-Healthier-Wales-Topic-2.pdf](https://futuregenerations.wales/wp-content/uploads/2019/11/FINAL-Healthier-Wales-Topic-2.pdf)

<sup>5</sup> **The Public Health Wales Act 2017**. Available at [legislation.gov.uk/anaw/2017/2/contents/enacted](https://legislation.gov.uk/anaw/2017/2/contents/enacted)

<sup>6</sup> **Public Health Wales NHS Trust (2018)** The case for action on obesity in Wales. Available at [phw.nhs.wales/topics/overweight-and-obesity/the-case-for-action-on-obesity-in-wales/](https://phw.nhs.wales/topics/overweight-and-obesity/the-case-for-action-on-obesity-in-wales/)





## 2. Protecting sustainable sporting shooting and its role in Wales' rural economy

### Introduction

Shooting and countryside management across Wales are under threat due to various judicial reviews being brought forward by animal rights organisations such as Wild Justice. These judicial reviews challenge regulators on the use of current legislation. This has created an atmosphere of uncertainty and a lack of confidence in those whose livelihoods depend on Wales' rural economy and the ability to plan for the future.

The latest legal challenge regarding the legality of general licences in Wales was costly and time consuming for all involved. Although Natural Resources Wales (NRW) was successful on all three grounds, the cost to the organisation exceeded £140,000 and had an impact on vital work programmes already in progress, as staff had to prioritise this case over other projects. **NRW is currently conducting various reviews into wild bird shooting, trapping and the releasing of game birds<sup>7</sup>.**

There are increasing calls in Wales for more devolved powers to be granted to the country's police, in line with the Scottish model of policing. If the integration between the country's four forces into one national force is achieved, this would provide an opportunity to significantly improve the firearms licensing system.

### Policy proposals

#### 2.1 – Act on scientific, well-informed data and work with stakeholders to develop policies to manage the countryside.

BASC is represented in numerous stakeholder groups formed by NRW to review and report on findings of various Codes. It is vital that the scientific evidence provided by stakeholders helps form any policy direction. Individual stakeholders who are practitioners on the ground must be given a voice on how best to manage the countryside.

<sup>7</sup>Natural Resources Wales. Wild Bird Review. Available at [naturalresources.wales/permits-and-permissions/species-licensing/uk-protected-species-licensing/wild-bird-review/?lang=en](https://naturalresources.wales/permits-and-permissions/species-licensing/uk-protected-species-licensing/wild-bird-review/?lang=en)

## 2.2 – Protect and enhance country sports with a viable, sustainable, and workable general licensing and consenting system.

Any changes to general licences must only be implemented due to scientific evidence and data demonstrating the need for change. Any changes to the general licensing system must be funded appropriately and provide users with workable general licences that are easy to understand and straightforward to use. They must have appropriate timelines to allow the rural community to adapt and plan business changes. Consenting systems must be fair to all and treat all countryside stakeholders equally.



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## 3. Sustainable moorland/peatland management

### Introduction

Welsh moorlands are a fragile and important habitat. Historically, past policies have not recognised the role these habitats play as peatland carbon stores, wildlife rich environments and potential visitor attractions. Today, many moorland habitats are failing key features – the future of these landscapes must involve all stakeholders including the shooting community for the greater good.

BASC supports the current Welsh Peatland Action Plan. The shooting community is a key stakeholder that can work with communities to deliver multiple net benefits for peatland restoration, providing nature-based solutions to the climate change emergency. The historical value given to moorland by shooting has protected Welsh peatlands, conserving priority dry and wet heathland and blanket bog. It has also prevented areas from being turned into commercial forestry which can result in carbon loss on peatland and the acidification of streams and rivers.



In recent years there has been much research carried out to establish methods for regeneration in derelict areas and the maintenance of wildlife. Heather burning is a traditional way of managing heather moors in Wales and is legislated to take place between 1 October and 31 March<sup>8</sup>. It can improve accessibility and food value for grazing animals and produces a diverse structure and composition of vegetation suitable for a variety of wildlife such as curlew and plover, and upland gamebirds like the red grouse.

Peatlands extend over at least four per cent of the Welsh landscape and comprise one of our principal natural resources. They support a rich collection of important habitats and species and deliver a range of regulating ecosystem services of primary importance to the environment and people of Wales. Approximately 50 per cent of all Welsh peatlands are designated, and peatlands occur on 250 Welsh SSSIs<sup>9</sup>.

The latest long-term, peer-reviewed research demonstrates that controlled vegetation burns can form part of the land manager's tool kit, along with rewetting, mowing, rewilding, and grazing<sup>10</sup>. Moorland can once again thrive, benefiting key species like hen harrier, curlew, merlin, black grouse and red grouse<sup>11</sup>.

Restoring and then maintaining peatlands in good ecological condition is the only way that we can both safeguard and sustain their rich biodiversity and ensure that the delivery of the full range of ecosystem services associated with peatlands is maximised.

## Policy proposals

### 3.1 – The re-establishment of sustainable moorland management across Wales to support habitat creation and population success of a diverse range of bird species.

Moorland restoration must be made sustainable and economically viable for nature to thrive across Wales. A key way to deliver this is to recognise the need for predator control, not only for the life of three-to-five-year-long projects but as a sustainable and ongoing part of any restoration plans of moorland before funding is agreed. In addition, further development of Wales' single species action plans for birds, such as the one completed for curlew, would be of real benefit<sup>12</sup>.

Sustainable moorland management helps deliver on Welsh Government carbon storage targets. It can alleviate flooding and helps protect, maintain or improve dry/wet heath and blanket bog SSSIs.

### 3.2 – An integrated approach to upland shooting to benefit rural economies, communities and wildlife.

BASC supports shooting partnership agreements between conservation organisations, landowners and/or government bodies. Past policies have often failed our uplands and there is no intention to return to a bygone era. Sustainable shooting in the Welsh uplands can benefit habitats and species, alongside communities. It can provide valuable economic inputs and protect peatlands from devastating wildfires. Shooting in upland Wales is part of a partnership solution to the Peatland Action Plan.

<sup>8</sup> **Welsh Government (2008)** Heather and grass burning code. Available at [gov.wales/heather-and-grass-burning-code](http://gov.wales/heather-and-grass-burning-code)

<sup>9</sup> **Natural Resources Wales (2020)** National Peatland Action Programme, 2020-2025. Available at [naturalresources.wales/about-us/strategies-and-plans/national-peatland-action-programme/?lang=en](http://naturalresources.wales/about-us/strategies-and-plans/national-peatland-action-programme/?lang=en)

<sup>10</sup> **Burning research**. Available at [features.york.ac.uk/a-burning-issue/index.html](http://features.york.ac.uk/a-burning-issue/index.html)

<sup>11</sup> **BASC 'Don't ban the burn'**. Available at [basc.org.uk/dont-ban-the-burn/](http://basc.org.uk/dont-ban-the-burn/)

<sup>12</sup> **GWCT (2017)** Conserving the Curlew: A practical guide produced by Game and Wildlife Conservation Trust. Available at [gwct.org.uk/media/1138547/Conserving-the-Curlew.pdf](http://gwct.org.uk/media/1138547/Conserving-the-Curlew.pdf)



## 4. Species conservation management

### Introduction

For many people, deer stalking is a recreational activity, but it is also necessary to protect agricultural crops, forestry, native flora and, indeed, deer themselves. Deer are prolific breeders and, if numbers are allowed to increase unchecked, they may become prone to starvation and disease. The culling of deer should always take place as part of a deer management plan which considers both the welfare of the animals and the damage they may cause.

There are six species of deer in the UK. Two of these species – red and roe – are native, while sika, fallow, muntjac and Chinese water deer are a result of historic introductions. Muntjac are particularly successful and are considered a problematic invasive non-native species (INNS)<sup>13</sup>. While fallow is currently the predominant species present in Wales, there is a notable expansion of roe and muntjac, with populations growing and distribution moving east to west<sup>14</sup>.

Grey squirrels are a significant invasive non-native species in Wales, having spread rapidly after their introduction to Britain in the late 1800s. Grey squirrels outcompete native red squirrels for food. They also carry a viral infection, known as squirrel pox, which is fatal to red squirrels. The economic cost of grey squirrel damage to Welsh forests is estimated to be nearly £1 million per year<sup>15</sup>. BASC currently chairs the stakeholder forum that is assisting the Welsh Government with the delivery of a specific management plan to mitigate the problems caused to nature and people by grey squirrels. The Welsh Government's Woodlands for Wales (WfW) Strategy sets out a 50-year strategy for woodlands and trees and will be far more challenging to deliver unless the negative impacts of grey squirrels are properly addressed<sup>16</sup>.

These species present a threat to the Welsh Government's targets on the expansion of woodland cover, which relates to government climate change policies.

<sup>13</sup> **GB Non Native Species Secretariat**. Available at [nonnativespecies.org/index.cfm?sectionid=47](https://nonnativespecies.org/index.cfm?sectionid=47)

<sup>14</sup> **Welsh Government (2017)** Deer Management Action Plan. Available at [gov.wales/sites/default/files/publications/2019-05/wild-deer-management-action-plan-2017-to-2022.pdf](https://gov.wales/sites/default/files/publications/2019-05/wild-deer-management-action-plan-2017-to-2022.pdf)

<sup>15</sup> **Welsh Government (2018)** Grey Squirrel Management Action Plan for Wales – November 2018. Available at [gov.wales/sites/default/files/publications/2021-01/grey-squirrel-management-action-plan-for-wales.pdf](https://gov.wales/sites/default/files/publications/2021-01/grey-squirrel-management-action-plan-for-wales.pdf)

<sup>16</sup> **Welsh Government (2018)** Woodland for Wales. The Welsh Government's Strategy for Woodlands and Trees. Available at [gov.wales/sites/default/files/publications/2018-06/woodlands-for-wales-strategy\\_0.pdf](https://gov.wales/sites/default/files/publications/2018-06/woodlands-for-wales-strategy_0.pdf)

There is a growing concern over the expanding wild boar population in the Forest of Dean and some wild boar releases in South Wales, too. Apart from the extensive damage to road verges, village greens, etc., they contribute to an increased number of road traffic accidents, which can be fatal. The chief concern regarding increased population size and spread is disease transmission, especially into the domestic pig herds of Wales.

The Eurasian curlew is the most pressing bird conservation priority in the UK. In Wales, responsibility for the delivery of the African-Eurasian Waterbird Agreement (AEWA) International Action Plan falls to the Welsh Government. Following a hugely successful Wales Curlew Conference in Builth Wells in 2018, a group was formed to push forward conservation of the species in Wales. Gylfinir Cymru, which includes BASC, has written the *Wales Single Species Action Plan for the Conservation of Eurasian Curlew* at the request of the Welsh Government. This ten-year plan will drive forward coordinated conservation action to prevent the curlew from becoming extinct as a breeding bird in Wales by 2033, as is predicted according to its current population and rate of decline. The curlew is not just a single species needing our help; it is a true indicator of the health of our environment – and an environment where curlew thrive, is one that meets the wider aims of the Welsh Government through the Environment Act for people and the environment.

## Policy proposals

### 4.1 – Review and update the five-year Wild Deer Management Action Plan Wales (2022-2027) and the five-year Grey Squirrel Management Action Plan Wales (2023-2028).

BASC plays a major role in helping the Welsh Government achieve the outcomes in both the Action Plan for Wild Deer Management in Wales (2017-2022) and the Grey Squirrel Management Plan for Wales (2018-2023). BASC is the delivery agent on many of the outcomes.

Continued support and updating of these plans are vital for the Welsh Government to achieve its targets, as set out in the following: *Woodland for Wales* (2009); *Nature Recovery Plan* (2015); *Climate Change Strategy for Wales* (2010); *GB Invasive Non-Native Species (INNS) Strategy*.

### 4.2 – Production of a five-year Feral Wild Boar Management Action Plan Wales (2021-2026).

Feral wild boar are established in Wales but are currently mostly confined to the south east of the country, mainly to the east of the River Wye. Defra has a Feral Wild Boar Action Plan (2008), but the Welsh Government has not yet published a plan for Wales. The Defra plan helps protect domestic farming herds from disease and habitat in England, and it is vital that Wales develops and implements a management plan while there is still opportunity to stop the spread of wild boar across the country and prevent the variety of associated negative impacts they can have on livestock, public health and the landscape.

### 4.3 – Delivery of the forthcoming Wales Single Species Action Plan for the Conservation of Eurasian Curlew – to save the species and meet the aspirations of the Environment Act and Well-being of Future Generations Act.

BASC is a co-compiler and signatory to this plan, which is Wales' best hope to turn around the state of our environment, see curlew recover, and help fulfil the wider objectives of the Environment Act and Well-being of Future Generations Act. The UK has around a quarter of the worldwide breeding population of curlew; our responsibility is truly global for both the species and for people across its international flyway. The Welsh Government requested this plan be set out, and as we rebuild from the coronavirus pandemic and Brexit, BASC expects to see strong commitment from the Welsh Government across departments to help both Gylfinir Cymru and wider society succeed in creating a greener and more prosperous Wales.



# About BASC

The British Association for Shooting and Conservation (BASC) is the largest shooting organisation in the United Kingdom, with a membership of 150,000, including 7,000 members in Wales. BASC employs 140 staff across the UK (80 of which are based at its headquarters at Marford Mill, Wrexham, North Wales), who are dedicated to ensuring a guaranteed future for sustainable shooting sports in all their diversity as a widely-enjoyed and important part of the environment, economy and culture.



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Registered Society No: 28488R