

Scottish Government response to the report from the Grouse Moor Management Group

November 2020

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Background

In 2017, Roseanna Cunningham, the Cabinet Secretary for the Environment, Climate Change and Land Reform, commissioned an independent group to look at the environmental impact of grouse moor management.

The Cabinet Secretary's decision to form the review group was prompted by the report¹ from NatureScot (formerly Scottish Natural Heritage) in May 2017, which found that around a third of satellite-tagged golden eagles in Scotland disappeared in suspicious circumstances, on or around grouse moors.

Alongside this review, the Scottish Government commissioned research into the costs and benefits of large shooting estates to Scotland's economy and biodiversity².

The Scottish Government has also introduced measures which are aimed at addressing the on-going issue of wildlife crime – and in particular raptor persecution – in Scotland including:

- increasing resources for the detection and investigation of wildlife crime.
- Increasing the maximum penalties for the most serious wildlife crimes through the Animals and Wildlife (Penalties, Protections and Powers) (Scotland) Act 2020 (the AWPPP Act)³.

The Grouse Moor Management Group Remit

The group's remit was to examine the environmental impact of grouse moor management practices such as muirburn, the use of medicated grit and mountain hare culls, and advise on the option of licensing grouse shooting businesses.

In doing so the group were asked to have due regard to the socio-economic impacts of grouse moor management so that they might continue to contribute to the rural economy, while being environmentally sustainable and compliant with the law.

Membership

The Grouse Moor Management Group (GMMG) was made up of the following members:

Chair

- Professor Alan Werritty

Members

- Alexander Jameson

¹ [Analyses of the fates of satellite-tracked Golden Eagles in Scotland. Scottish Natural Heritage Commissioned Report No. 982. Scottish Natural Heritage.](#)

² Phase 1 research – [Socioeconomic and biodiversity impacts of driven grouse moors in Scotland](#)

Phase 2 research – [Socioeconomic and biodiversity impacts of driven grouse moors and the employment rights of gamekeepers](#)

³ [Animals and Wildlife \(Penalties, Protections and Powers\) \(Scotland\) Act 2020](#)

- Professor Alison Hester
- Professor Colin Reid
- Professor Ian Newton
- Mark Oddy

Specialist Advisors

- Dr Adam Smith
- Dr Calum MacDonald
- Professor Des Thompson
- Susan Davies

Secretary

- Karen Rentoul

Summary of work

The GMMG was established in November 2017 and held its first meeting on 16 January 2018. Following a series of meetings and discussions, the Group submitted their final report on 18 November 2019 and it was published by the Scottish Government on 19 December 2019.

Further details about the Group, including the minutes of meetings and a copy of their final report can be found on the Scottish Government website⁴.

Scottish Government's response to the recommendations of the GMMG

In preparing this response, full consideration has been given to the recommendations and findings of the GMMG report alongside the evidence they gave to the Environment, Climate Change and Land Reform Committee on 21 January 2020⁵ and the Phase 1 and Phase 2 Scottish Government commissioned research on the socio-economic impacts of grouse moors.

The recommendations of the Independent Deer Working Group⁶, and the Climate Change Committee report⁷ have also been taken into account where they relate to areas covered by the Grouse Moor Management Group e.g. muirburn.

Where appropriate the views of other Scottish Government agencies and non-departmental public bodies such as NatureScot, Scottish Forestry, the Scottish Environment Protection Agency (SEPA), and Food Standards Scotland have been sought. The evidence and views put forward by stakeholders including environmental Non-Government Organisations (eNGOs) and land management groups, since the publication of the report have also been taken into account.

⁴ [Grouse Moor Management Group](#)

⁵ [Grouse Moor Management Group Evidence to ECCLR 21 January 2020](#)

⁶ [Deer working group report 'The Management of Wild Deer in Scotland'](#)

⁷ [Committee for Climate Change report 'Land Use: Policies for a Net Zero UK'](#)

Scottish Government response

GMMG Recommendations – licensing

- We unanimously recommend that a licensing scheme be introduced for the shooting of grouse if, within five years from the Scottish Government publishing this report, there is no marked improvement in the ecological sustainability of grouse moor management, as evidenced by the populations of breeding Golden Eagles, Hen Harriers and Peregrines on or within the vicinity of grouse moors being in favourable condition.
- That a framework Code of Practice on grouse shooting be produced reflecting regulation specific to the sector and advising on best management practices. If statutory provisions are included, the Code would need approval by Scottish Ministers with SNH having oversight and ownership.
- That in accordance with the remit to “ensure that grouse moor management continues to contribute to the rural economy” we do not recommend that grouse shooting be banned
- That an accreditation scheme on grouse moor management should be developed following widespread consultation across the grouse shooting sector.

Response

The Scottish Government agrees that a licensing scheme should be introduced. However, we believe that it should be implemented earlier than the five-year timeframe suggested by the review group.

Grouse shooting makes an important contribution to the rural economy and many grouse moor managers already follow best practice guidance and take good care of the land that they manage.

However, the Werritty report is clear that there are a number of problematical issues surrounding certain practices on grouse moors and that further regulation and increased/enhanced monitoring is needed across a number of areas. In terms of raptor persecution in particular, although the official recommendation of the Grouse Moor Management Group (GMMG) is as stated above, Professor Werritty noted in his introduction to the report that this recommendation was a compromise and half of the group, including the Chair, were in favour of immediate introduction:

‘The Group was evenly split on whether or not to license grouse shooting. When, as Chair, I sought to exercise a casting vote in favour of the immediate introduction of licensing, this was contested by two members of the Group. In order to have a unanimous recommendation on this key issue with the authority that implies, the Group proposes a five year probationary period for specified raptors on or near grouse shooting estates to recover to a ‘favourable’ conservation status.’

Despite clear and repeated messages from Scottish Ministers that such activity is entirely unacceptable, raptor persecution continues to be a significant and ongoing issue in Scotland.

Since 2007, the Scottish Government has undertaken a range of measures to tackle wildlife crime, including: the introduction of vicarious liability; a poisons disposal scheme; restrictions on licences for those operating on land where it is suspected that wildlife crime has taken place; and additional resources for Police Scotland to tackle wildlife crime. The fact that raptor persecution continues in spite of all the measures we have already taken suggests that, while regulation from within the grouse shooting industry can be an important factor, self-regulation alone will not be enough to end the illegal killing of raptors and further government intervention is now required.

Therefore, taking into account all relevant evidence, the Scottish Government takes the view that the balance of arguments now points towards the need for licensing.

The introduction of licensing arrangements this will bring the system in Scotland closer into line with those that apply in other comparable countries, where greater regulation of shooting and hunting is carried out, in order to protect animal welfare and avoid damage to the environment and biodiversity.

Next steps

- We intend to bring forward the legislation to license grouse moor management during the next parliamentary term. This will be preceded by a full public and stakeholder consultation.
- The legislation will be accompanied by a new Code of Practice on grouse shooting.

GMMG Recommendations - mountain hares

- That the shooting of Mountain Hares should be subject to increased legal regulation.
- That, where the shooting of Mountain Hares is to be undertaken, land managers should be required to report annually to SNH the number of Mountain Hares present (using a standard counting method) and numbers shot on an area of land.
- That shooting of Mountain Hares should only be undertaken at the times licensed and in compliance with a Code of Practice on the management of Mountain Hares.
- That, to address concerns about the reliability of Mountain Hare numbers, SNH should generate a more robust evidence-base on the distribution, numbers and management influences on Mountain Hares to better inform management as well as Article 17 reporting to the Scottish Government and the EU.
- That adaptive management research should be used to determine relationships between local populations and numbers killed, to help inform and improve management recommendations over time to promote favourable conservation status for Mountain Hares in Scotland.
- That SNH embark on achieving a count of Mountain Hare numbers across Scotland, not just on grouse moors nor just where they are being shot.
- That a Code of Practice on the management of Mountain Hares, including legally enforceable reporting requirements, should be developed.
- That should the conservation status of Mountain Hares prove to be 'unfavourable' then a licensing system for the shooting of Mountain Hares should be introduced.

Response

The Scottish Government agrees that the shooting of mountain hares should be subject to increased regulation.

Mountain hares are a traditional quarry species and as the law currently stands, they can be killed without a licence during the 'open season', which runs from 1 August to 28 February. Outwith the open season they can only be killed under licence from NatureScot.

The AWPPP Act contains a provision to add mountain hares to Schedule 5 of the Wildlife and Countryside Act 1981, which will make mountain hares a fully protected species. This means that once the provision is commenced, mountain hares can only be killed under licence for certain limited purposes, such as preventing damage to growing timber or crops or conserving flora and fauna.

This provision meets and in some respects goes further than the recommendations made by the GMMG. The arrangements for licensing of mountain hare culls are now being taken forward as part of the implementation work for the AWPPP Act and the Scottish government is working with NatureScot and stakeholders to develop licensing arrangements which will include requirements to report on the number of hares shot and to comply with best practice with regards to how such culls are undertaken.

Next steps

- We will shortly lay legislation to commence the relevant provisions of the AWPPP Act to give greater protection to mountain hares.
- The current open season for mountain hares, which is due to end on 28 February 2021, will be the last such 'open season'.
- From 1 March 2021 mountain hare will only be able to be killed under licence from NatureScot and only for the purposes listed in section 16 of the Wildlife and Countryside Act 1981⁸.

GMMG Recommendations – muirburn

- That muirburn should be subject to increased legal regulation
- This should apply to all muirburn, not only on grouse moors.
- That the Scottish Government should increase regulatory control relating to the Muirburn Code
- That SNH [NatureScot] and [the Scottish Government] Rural Payments and Inspections Directorate (RPID) should be given power and resources to monitor adherence to the Muirburn Code by any land manager carrying out muirburn, whether or not they are in receipt of muirburn-related support payments
- That increased training should be required for any land manager directly involved in setting and managing fires
- That the Muirburn Code should be subject to regular updates to represent best available knowledge and consideration of predicted changes in climate that might require additional changes to parts of the Code. That this process be subject to expert peer-review
- That a fire danger rating system for Scotland should be introduced to better support decision-making about where and when to burn
- That the Scottish Government explore changes to the current RPID support payments that would discourage malpractice more effectively than the current very limited breach and penalty powers
- That the Muirburn Code published in 2017 should be updated to include the Supplement to the Code: A guide to Best Practice
- That muirburn should be unlawful unless carried out under a licence.

Response

The Scottish Government agrees that muirburn should be subject to tighter regulation and oversight and that in future it should only be undertaken under licence from NatureScot.

Muirburn (the practice of burning old growth on a heather moor to encourage new growth for grazing and habitat) is a complex issue. Muirburn is an activity which is not limited to grouse moor management and is undertaken in conjunction with other land based activities such as agriculture and crofting. Under the current regulations muirburn can be undertaken from 1 October to 15 April in Scotland. Outwith these times Muirburn can only be done under licence from NatureScot.

The research to-date suggests that muirburn has both beneficial and adverse effects. If it is undertaken without due consideration of all the possible consequences it has the potential to have a serious negative impact on wildlife and the wider environment. However, it can also bring positive benefits in some cases, for example by creating beneficial habitats for certain species or by helping to reduce fuel loads and thereby reduce the risk of wildfires.

Tackling climate change and reducing carbon emissions is one of the Scottish Government's top priorities and peatland restoration plays an essential role in this. There is a risk that by continuing

⁸ [Wildlife and Countryside Act 1981](#)

to allow unregulated muirburn on peatland some of this work could be negated by potential damage to peatland sites.

The Muirburn Code⁹ advises against burning on peatland (unless as part of a habitat restoration plan), however, unless the peatland is part of a Site of Special Scientific Interest (SSSI)¹⁰ (in which case consent from NatureScot is required) there is no legal prohibition against burning on peatland in Scotland.

As well as the GMMG review and the, the impact of muirburn has also been considered by the Independent Deer Working Group, the Committee for Climate Change and by the Clean Air Strategy Steering Group¹¹ who have all make recommendations for greater oversight and regulation of this activity.

Taking all of the evidence into account, the Scottish Government takes the view that there should be increased monitoring and regulation of muirburn, some of which could be done through a refreshed code of practice and some of which will need to be done on a statutory basis. Further, given that muirburn is undertaken throughout Scotland for a variety of purposes, this should be done in relation to all muirburn activity, not just when it is undertaken in relation to grouse moor management.

Next steps

- During the next parliamentary term, following a full public consultation, we will bring forward the legislation necessary to enhance the monitoring and regulation of muirburn and to introduce a licensing regime.
- We will also bring forward legislation within the next parliament to ban muirburn on peatland (except in very limited cases as part of an approved habitat restoration programme).
- And we will undertake a review of the current definition of peatland, taking expert advice on whether it should be revised and a stricter definition imposed.

GMMR Recommendations – traps

- That new legislation should be introduced to make it a legal requirement that it becomes an offence to set or operate a trap without an operator having successfully completed a course run by an approved and accredited body and dealing with the relevant category of trap (cage and/or spring). A trap operator who has successfully completed a relevant trap training course should apply to their local police station for a unique identification number which must be attached to all traps that are set.
- That any operator dealing with the relevant category of trap (cage and/or spring) should undergo refresher training at least once every ten years.

Response

The Scottish Government accepts the need for greater regulation of the use of traps for land management purposes in Scotland.

⁹ [The Muirburn Code](#)

¹⁰ [SSSIs in Scotland](#)

¹¹ [Cleaner Air Scotland Strategy](#)

The use of snares to trap wildlife is governed by the Wildlife and Countryside Act 1981 (as amended by the Wildlife and Natural Environment (Scotland) Act 2011).¹² Those regulations require snaring operators to be trained, for their snares to be identified by a tag containing an ID number registered with NatureScot and for them to keep records, which have to be made available to Police Scotland on request. Operators of crow cage traps and Larsen traps are also required to register with NatureScot and must display a single tag or sign that shows the NatureScot Trap Registration Number which allows the individual operator to be identified. There are currently no such requirements for operators of spring traps or small mammal live capture cage traps.

The Scottish Government accepts that the use of traps is sometimes necessary to enable land managers to control certain species to protect livestock, crops, and wild birds. However, we also acknowledge that as noted in the GMMG report, the lawful use of traps can sometimes result in unintended harm to wildlife and there are occasions where traps are not being deployed or used in a manner that is compliant with the current regulations. This recommendation would bring the regulations for trapping broadly in line with those for snaring: the requirement for detailed record keeping and individual trapper IDs would also help inform a better understanding of the level of trapping being undertaken in Scotland.

We are determined to maintain the highest standards of animal welfare and will explore what further regulation is required as we develop our plans for a licensing regime.

Next steps

- We will amend the legislation to strengthen the use and monitoring of traps as part of our work to develop a licensing regime for grouse moor management.

GMMG Recommendations – medicated grit and environmental monitoring

- That there should be wider Continuing Professional Development training for veterinary surgeons on the use of medicated grit.
- That the Scottish Environment Protection Agency (SEPA) should initiate a desk-based study to determine the appropriate nature and extent of a monitoring programme to ascertain whether Flubendazole [the active chemical, used in medicated grit] residues exist in water bodies on or downstream from where it is being used, including in association with grouse moors, to conduct such a monitoring programme and to report on its findings.
- SNH should publish a Code of Practice on the use of medicated grit and that all land managers should adhere to said code.
- SNH should have powers to check compliance with the Code of Practice.
- That if after 5 years or less, following introduction of the Code of Practice, non-compliance is still wide spread, the option of introducing increased legal control should be considered.
- Food Standards Scotland should undertake work to identify the level of Flubendazole residue in grouse that are inimical to human health and establish appropriate monitoring.
- That should the associated risk provide necessary, future monitoring of Cryptosporidium in connection with the use of medicated grit, should be undertaken.

Response

The Scottish Government agrees that monitoring of Flubendazole residue in grouse should continue and that a code of practice on the use of medicated grit should be developed.

¹² [Wildlife and Natural Environment \(Scotland\) Act 2011](#)

Medicated grit is used by grouse moor managers to control a worm parasite that affects grouse. It has been very effective in stabilising fluctuations in grouse populations. However, there have been concerns expressed that control over its use is inadequate and that it may be ingested by other species and/or be leaching into water-courses.

Medicated grit is prescribed by vets, pharmacists and suitably qualified persons but it is administered to grouse by individual land managers who are responsible for ensuring that they use it as instructed and follow any advice provided by their vet.

The Veterinary Medicines Directorate (VMD), an Executive Agency of the UK Government Department for the Environment Food and Rural Affairs (DEFRA), is responsible for the monitoring of veterinary residues (including Flubendazole residue in grouse). VMD undertakes an annual sampling programme and if any food-related issues are identified relating to Scotland they inform FSS who undertake a risk assessment to determine any action that may be required to protect consumers.

The VMD programme has undertaken random samples of red grouse and tested them for anti-parasitic drugs such as Flubendazole: their annual reports show that 23 samples have been taken since 2015 with none exceeding the Maximum Residue Level (or Action Level) of 400 µg/kg for liver.

As recommended by the Grouse Moor Management review group, The Scottish Environment Protection Agency (SEPA) undertook a desk-based study on Flubendazole¹³. The study found that:

- If best practice is followed risks to surface waters and sediment are likely to be low.
- Based on typical dose rates, exposure in animals that may predate or scavenge on grouse carcasses is likely to be low, as are levels in soil, compared with levels that may cause a risk.
- As investigative tools, chemical and ecological monitoring are unlikely to give much information on most cases of poor practice unless conditions are such that poor practice is resulting in an extreme and prolonged release to a waterway.

Next steps

- The Scottish Government will publish the findings of the SEPA desk-based study.
- The Veterinary Medicines Directorate will continue to undertake monitoring in line with current practice. If notified of an unsatisfactory result by the Veterinary Medicines Directorate, Food Standards Scotland will undertake appropriate action to assess and manage any risks to the food supply chain.
- The Scottish Government will work with stakeholders to produce guidance on best management practices for the use of medicated grit.
- We will also convene an expert group to consider how best to monitor compliance with the code of practice going forward.

Recommendations – penalties and sentencing guidelines

- That with the establishment of the Scottish Sentencing Council in October 2015, sentencing guidelines are developed for wildlife offences.
- That, in light of announced consultations, the following recommendations of the Wildlife Crime Penalties Review Group (Poustie Review¹⁴) should be enacted:

¹³ <https://www.gov.scot/ISBN/978-1-80004-344-2>

¹⁴ [Wildlife Crime Penalties Review Group report](#)

- That maximum penalties available on summary conviction at least for the more serious offences, are raised to at least a £40,000 fine and up to 12 months imprisonment.
- That conviction on indictment is more commonly made available across the range of wildlife offences with a maximum term of imprisonment of up to 5 years. This would not necessarily require a stand-alone Act but could be achieved as part of the next Criminal Justice or Criminal Proceedings Act.
- That forfeiture provisions are extended and these and other alternative penalties are made consistent across the range of wildlife legislation as appropriate.
- That where a firearm or shotgun is involved in the commission of a wildlife crime, the court should have the power to cancel the relevant certificate, as is already the case in the Deer (Scotland) Act 1996.
- That consideration should be given to amending firearms legislation which is reserved to the UK Parliament to allow the Chief Constable to withdraw a shotgun certificate where such a weapon has been involved in the commission of a wildlife crime not just on grounds of public safety but also on the grounds of a threat to the safety of wildlife.
- Given the fragmented nature of current wildlife legislation, we recommend consolidation of this area of law (as recommended by Poustie).

Response

The Wildlife Crime Penalties Review Group report (the ‘Poustie’ review) was published on 19 November 2015 and the Scottish Government has accepted all of the recommendations of the report.

We have implemented the main recommendations of the Poustie Review through the Animal and Wildlife (Penalties, Protections and Powers) (Scotland) Act 2020. These provisions will be commenced over the coming months.

Sentencing guidelines are a matter for the Scottish Sentencing Council. The Scottish Sentencing Council are developing sentencing and guidelines for wildlife and environment offences as part of their work plan¹⁵. More information about this work and how it is progressing can be found on the Scottish Sentencing Council website.

Most firearms legislation is reserved to the UK Government however, the Scottish Government is supportive of these recommendations and will continue to liaise with the UK Government on this matter.

Next steps

- On 16th November 2020 an SSI was laid in the Scottish Parliament to commence specified provisions of the AWPPP Act, including those relating to higher penalties for wildlife crimes. The new higher penalties will come into force on 30th November 2020.

GMMG Recommendations – birds of prey

- That there should be no change in the legal status of any bird-of-prey species in Scotland.
- That where particular species are perceived to be limiting the populations of red and or amber-listed ground-nesting birds, including Red Grouse, greater use should be made of the Wildlife & Countryside Act 1981 section 16.

¹⁵ [Scottish Sentencing Council guidelines in development](#)

- That the brood management programme for Hen Harriers in England¹⁶ should be monitored, and if it is deemed successful in producing an increase in the breeding numbers and distribution of Hen Harriers, then consideration should be given to introducing a similar programme in Scotland.
- That SNH, possibly through their licensing agent the [the British Trust for Ornithology] BTO, or directly, ensure that the licences issued for the satellite-based tracking of tagged raptors includes a condition that commits the data holder (i.e. the owner of the tag) to: (a) being listed on a register of data holders which SNH, BTO and Police Scotland have access to; and (b) cooperate expeditiously with Police Scotland and SNH in sharing data and associated information regarding tagged birds found dead or missing in suspicious circumstances. That on receipt of shared data and associated information, Police Scotland expeditiously processes the shared data and associated information to determine whether or not it warrants referral to the Crown Office and Procurator Fiscal Service. The current priority raptors for data sharing would be Golden Eagle, Hen Harrier, Red Kite, Peregrine, White-tailed Eagle and Goshawk.

Response

The Scottish Government agrees that there should be no change to the legal status of birds of prey in Scotland.

All wild birds, including birds of prey such as hawks, eagles, kites, buzzards, harriers, falcons and owls are protected species in the UK under the Wildlife and Countryside Act 1981. It is illegal to cause them harm, whether through poisoning, shooting, trapping, habitat destruction, removal of eggs or nest disturbance. Under the 1981 Act licensing provisions allow NatureScot to permit a range of lethal and non-lethal management options where wild birds are having an adverse effect on flora and fauna, including limiting the populations of red and or amber-listed ground-nesting birds, such as Red Grouse. There are however requirements for the damage to be serious and for there to be no other satisfactory alternatives to licensed lethal control. NatureScot keeps these requirements under review.

Brood management involves the licensed removal of bird eggs from the wild. The chicks are reared by hand in captivity and then released back into the wild in a safe environment. A brood management trial scheme is currently being run in England. Nature England state on their website that: ¹⁷

‘The aims of the brood management trial are to understand if it is possible to rear hen harriers in captivity and then release them to become successful breeding adults in the English uplands but also to investigate the effects of this technique on the perceptions and behaviour of the moorland community.’

While we do not believe that there is currently any strong evidence to suggest the need for a similar scheme in Scotland we are monitoring the hen harrier brood management programme in England and we will carefully consider the outcomes of the pilot scheme.

NatureScot have agreed new data-sharing protocols which will be conditioned for all permit holders who wish to employ satellite-based tracking of tagged raptors birds under licence with BTO. These protocols will be in place for the start of the 2021 tagging season in Spring 2021 and will meet the requirements of the GMMG recommendations.

¹⁶ [UK Government Joint action plan to increase hen harrier numbers in England](#)

¹⁷ [Natural England brood management blog](#)

Next steps

- NatureScot will continue to monitor the results of brood management schemes elsewhere in the UK.
- NatureScot will continue to monitor and evaluate the need for and use of licences under Section 16 of the Wildlife and Countryside Act 1981.

GMMG Recommendations – grouse moor management

- That as much as possible should be done to change the culture of grouse moor management to accept more loss of grouse to avian predators and to allow these predators to nest locally.
- That a wider range of moorland management activities should become eligible for RPID support.

Response

We accept these recommendations.

Next steps

- The Scottish Government will write to stakeholders groups representing grouse moor managers and ask them to consider what action they can take to promote a change in culture within their organisation and to provide us with information on how they intend to take this forward.
- The Scottish Government's Agricultural and Rural Economy Directorate will consider whether a wider range of moorland management activities should become eligible for RPID support further when developing future support schemes or biodiversity and climate change actions.



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