

From: Exmoor Society Trustees

To: Exmoor National Park Authority (Sarah Bryan, Dan Barnett)

Date: 04 December 2018

GAME SHOOTING IN EXMOOR – EXMOOR SOCIETY PERSPECTIVES

Background

1. The Exmoor National Park Authority (ENPA) has reported that “there has been some increased discussion about the impact of game shooting on Exmoor, via our Partnership Plan public consultation and also via comments made by our Local Access Forum, Authority Members and local community. Our recently published Landscape Character Assessment has also revealed some concerns about the developing impact of game shoots.”
2. In summary, the issues of concern regarding game shooting include:
 - Intensity of released birds and associated impact on flora & fauna as well as contamination of water courses with faeces and sediments
 - Visual impact of feeders, bare ground, fencing and other infrastructure
 - Netting/fencing and electrification making public rights of way gates and paths harder to use
 - The impact of excess grain including smell, rodent population and contamination of water courses
 - Wear and tear on public rights of way and roads from vehicles to service the rearing, release and shooting of game birds
 - Noise impact of shooting, bird scarers and service vehicles
 - Wider landscape impacts including cover crops and track works
 - Flushed birds scaring horses on roads and public bridleways
 - Game birds on roads affecting drivers, as well as the visual impact of dead birds on roads
 - Potential pollution impacts of lead shot
 - Litter impacts of plastic wads
 - Environmental impacts of bird medical treatments and cover crop pesticides
3. The ENPA notes that none of the above issues are new, and some are of greater concern than others. It is acknowledged that the game shoot ‘industry’ has grown significantly on Exmoor over the last 20 years, which has brought some of these issues into greater focus. There is some concern that game shooting will continue to increase in area and/or intensity. Conversations with shoot managers suggest that all shoots are doing work to reduce their impacts already. ENPA is keen to help improve understanding of these impacts and see if they can be reduced further. It asserts the importance of engaging with the issues in order to achieve the Authority’s duty to protect the special qualities of the National Park, and hopes there are long term benefits to the shoot industry to be gained from looking at this with the Authority. Moreover, “if the Exmoor Society would like to feed into this discussion, we would be very interested to hear your views”.

Exmoor Society's Role

4. The Exmoor Society's scope for consideration of the impact of game shooting in Exmoor is defined by its Constitution which, in summary, states that the Objects of Exmoor Society are a) To secure the qualities of Exmoor National Park for the benefit of the public, and b) To encourage co-operation between statutory authorities, voluntary societies, land owners, farmers and other interested persons and organisations, on behalf of the public.
5. Game shooting is a legal activity. The Exmoor Society is interested in game shooting as one of many ways in which the public benefits from the special qualities of the Exmoor National Park. These include the conservation of its unique and precious environment, enjoyment of its visual landscape, tranquillity, hiking, horse and cycle riding, field sports, sportive events, and for living and working. Conflicts of interest may arise which need to be addressed with the intention of finding agreed solutions. In that spirit, the Exmoor Society independently has considered issues arising from game shooting.

Exmoor Society's approach

6. In the light of the ENPA invitation (paragraph 3 above), the Society's trustees charged Dr Keith Howe, Vice-chairman, with responsibility for investigating game shooting in Exmoor as a basis for recommending any future course of action. On that authority, 6 shoots in greater Exmoor were visited for discussions with their managers and game keepers. Written and oral opinions and evidence have been taken from other interested parties, both solicited and volunteered.
7. The information and impressions formed derive from a very small and selective sample of Exmoor shoots. Although subject to those limitations, it is believed that the knowledge obtained suffices to respond constructively to ENPA's invitation for Exmoor Society to comment. All visits were made and evidence collected during August and September 2018, coinciding with the first month of the partridge shooting season and one month before pheasant shooting commenced. Everything was obtained on the strict understanding that nothing communicated would be attributed by name and would be collated and reported fairly and dispassionately. Without exception, Dr Howe's enquiries were received with courtesy, generous expenditure of others' time entirely for his benefit, and unqualified helpfulness.
8. The recommendations arising from this study are made on the presumption that everyone engaged with game shooting in Exmoor – in commercial shoots, syndicates, and as rough shooters – are jointly responsible for maintaining the management and conduct of the activity to standards best placed to assure its long-term sustainability.

Observations on issues of concern

9. *Intensity of released birds:* There are conflicting views on intensity of released pheasants, perhaps because of different interpretations of 'intensity'. Stocking density in release pens were said to have fallen in recent years, possibly due to an increase in release pen area. At the same time, the total population of released birds in ENP is perceived by many people as having significantly increased, a view consistent with opinion that the scale of commercial game shooting has increased. If that is so, greater ecological impact is inevitable.

10. *Visual impact:* Location is key to people's opinions about the visual impact of feeders, bare ground, fencing and other infrastructure. Feeders are moved around as part of game bird management. Contrary to ENP Guidelines (undated), in one case feeders were observed placed at regular intervals along a public bridleway. Fences are not always obtrusive when located along woodland margins, but any tendency for the ground abutting to be bare and eroded because of bird and other animal movements along them is unsightly. (Also see 13 below.)
11. *Public rights of way:* Most large shoots have public rights of way going through them. Thus it is necessary to restrict their use during shooting, post warning notices, and provide wardens to assure public safety. Footpaths and tracks can benefit from shoot management. Need to access rearing or release pens is an incentive for shoots to maintain road and track surfaces in sufficiently good order for vehicles. A well-maintained surface provided by shoots is a benefit to other users where there are rights of public access. On the other hand, tracks can intrude on views across open hillsides.
12. *Smell, pests and contamination:* Other than bird density and feeding practices, location and microclimate are factors that contribute to unpleasant smell and the presence of pests. In the location where feeders were seen placed along a track (10 above), valley sides are steep and a stream flows through a release pen. Recent rain, mild and humid conditions following a prolonged dry spell probably contributed to a pervasive unpleasant smell. On return two weeks later as part of a formal visit there was no problem, and feeders had been removed.
13. *Wear and tear:* On the evidence of visits made, no exceptional wear and tear was observed on public rights of way and roads used by vehicles to service rearing pens, more often the contrary. But attention was drawn to the variable condition of gates on bridleways, for instance where frayed wire netting used to cover the foot of gates were held to pose a potential risk of injury to ridden horses. Also, the exceptionally dry summer was favourable to track conditions. Comments received subsequently referred to contrary experience in a different location at the end of the 2017-18 shooting season. Following very wet weather, damage to (private) farm tracks was extensive and associated with water quality issues at a nearby spring.
14. *Noise:* The 'infantry battle noise' during the shooting days, the daily heavy traffic for feeding the birds, particularly morning feeding on shoot days, and game crop bird scaring guns daily from early morning to dusk from June until the start of the shooting seasons, were mentioned during discussions as being ignored by the shoot management. The one significant source of noise experienced on shoot visits was from John Deere Gator or equivalent transporters used by keepers going about their work, replacements for quad bikes which are now ruled unacceptable on health and safety grounds. In time, quiet electric vehicles may be used instead.
15. *Landscape:* Exmoor Landscape Character Assessment, adopted as Supplementary Planning Guidance, identifies landscape impacts in several landscape types. Reference is made to cover crops and design principles, notably to avoid geometric shapes and running stripes up and down hillsides rather than following the contours. Also, kale or gorse appear more natural in the surrounding Exmoor landscape, where game cover crops commonly are very conspicuous, especially when arranged in regular geometric patterns. In general, the areas planted are appreciably greater than in the past.
16. *Scaring:* No incidents involving flushed birds scaring horses on roads and public bridleways were mentioned, although one commentator recalls a serious accident some ten years ago as a result

of a horse, scared by a shoot, bolting along a tarmac road. But assuring road safety in the presence of large pheasant populations must be a priority in the light of increasing motor traffic.

17. *Public roads:* The practice of 'dogging in' to keep birds off roads and tracks was witnessed. Two locations on major roads the author has known for many years had polite 'go slow' request signs erected. One of the roads had no pheasants present at the time, the other fewer than often has been the case. It was explained that topography, places pheasants naturally inhabit or go in search of grit, and so where guns need to be placed for shooting, are the reasons why birds straying onto those sections of public roads are tolerated, seemingly without considering scope for relocation.
18. *Lead shot:* Lead shot is potentially a significant pollutant associated with game shooting. One estimate is that some 50 tonnes of lead shot fall in Exmoor annually, obviously concentrated in the areas where most shooting takes place. This may be an underestimate. It was also claimed that there is evidence for lead shot not being a serious pollution problem.
19. *Litter:* Residue from expended cartridges (cases and plastic wadding) was encountered. One person reported finding 9 single-use plastic wads from cartridges in 1 square metre of bridleway, which eventually would decay and pass into the River Exe, a source of public water supply. Fibre wads are available, but not widely used by game shooters.
20. *Pharmaceuticals:* Keepers and shoot managers reported a reduction in antibiotic use, consistent with national public health priorities. One shoot visited legitimately had applied antibiotics as a last resort in response to actual disease outbreak. Particular mention was made of the benefits of having access to St David's Game Bird Services, a veterinary practice renowned for exceptional expertise in game bird health management.

Other evidence

Information obtained from field visits was supplemented from the following publications:-

21. PACEC (2006) provided evidence for the economic benefits of sporting game shooting in Exmoor in monetary, employment and social terms. The input-output methodology captures both direct and indirect effects. A possible limitation of the estimates is that coefficients were obtained from the official UK Office of National Statistics input-output tables, adjusted to distinguish shooting from similarly categorised but unrelated activities (op. cit. page 5), i.e. bias will be imparted if the coefficients are not representative of Exmoor. Now twelve years since, there is a strong case for updating the estimates. Alternatively, a survey approach to the description of Exmoor shooting may be less demanding on data, but still illuminating about the employment, income and expenditure links along the 'shooting chain'.
22. PACEC (2006) is much less satisfactory for its treatment of environmental impacts. The definition is too narrow, and takes into account only providers' views about aspects of habitat and wildlife management carried out specifically for game shooting purposes. Answers were 'verified' by asking shoot participants about their own experience in those respects. 'Noise pollution', ground erosion, and visual landscape impacts are also all real environmental costs which must be taken into account. Evaluation of these in monetary terms is difficult, to say the least. But they must be considered in any thorough appraisal of how game shooting impinges on other purposes for the National Park.

23. The report by Sage (2018) marks a significant advance on the environmental impact analysis of pheasant releasing and management for habitats and wildlife. Five areas were investigated, two of which showed negative effects and three positive. “Nevertheless, the impacts of game crops on the farmed landscape, on breeding birds in hedges, and the way that management for shooting tends to improve conifer woodlands, are significant benefits to habitats and wildlife in the region.” (page 6) This supports shoot managers’, keepers’, and the author’s own direct experience of observing wild birds in and around game cover crops seeded with mixtures conducive to biodiversity.
24. Clarification on understanding and the specific implications of information acquired by direct observation, contacts and discussion, and secondary sources was aided by reference to Brewin and Dimpleby (2018). Also, ‘The Exmoor Guidelines for the management of game birds in the National Park’ (Exmoor National Park Authority, undated) was used as the benchmark against which to appraise observations made in the field.

Conclusions

Paragraphs 9-24 above document both favourable and unfavourable aspects of game shooting in Exmoor. They range from relatively minor sources of irritation (except to people directly affected) to those having discernible impacts more generally. The following conclusions consider wider implications of Exmoor game shooting that were raised in discussions, or otherwise considered to have been overlooked:-

25. There is widespread acceptance of the benefits of game shooting in terms its role in enhancing the sense of community and shared enjoyment among people who take part as beaters and pickers-up, as well as a welcome source of extra income outside the main tourist and farming seasons. A great deal of unrecorded and unremunerated contributions to the public’s benefit are also made by game keepers, e.g. salting roads in winter, clearing tree debris, helping to alert the police to antisocial behaviour, and so on.
26. The political complexion of future UK governments was mentioned in discussion of the longer term prospects for game shooting. Labour Party policy to ban intensive rearing of game birds for shooting was cited as a potential threat. Irrespective of political party, a majority in British society appears not to be in favour of game shooting (Google ‘opinion polls on game shooting UK’). Explanations may include changing social norms driven by people’s remoteness from the experience of traditional rural pursuits, improved scientific understanding of the negative impacts on physical and psychological attributes of sentient animals, animal scientists (e.g. veterinarians) increasingly taking political positions on animal welfare. There is also a widespread perception that game shooting is practised mainly by super-rich men whose idea of recreation is to inflict suffering on innocent creatures reared with the express purpose of killing them. Negative perceptions of game shooting, real or imagined, must be addressed and satisfactorily answered if the activity is to be sustained for the long term. (Note: National Resources Wales has banned pheasant shooting on public land in Wales from March 2019)
27. Another consideration that must not be overlooked is the changing demographic profile of Exmoor’s rural community. National Parks attract incomer residents who cannot be assumed sympathetic to local traditions and culture. Their objectives in choosing Exmoor as a place to live may have more to do with natural beauty and tranquillity than any interest in field sports. Some people may be antagonistic, albeit passively. When they are, there are implications for shoots in relation to their local communities, noted below.

28. It is in the general public interest to review published evidence on the effects of lead shot for people and animals (e.g. Pain et al, 2009; GWCT 2016), and specifically in relation to Exmoor conditions. In particular, the environmental and economic implications of requiring use of alternative types of shot (e.g. bismuth, already obligatory for use in wetland areas) should be explored. Concerns were also expressed about the fate of birds wounded by shooting but not recovered, and those birds left over at the end of the shooting season. Despite reassurances, a sense that some information given in good faith was essentially anecdotal suggests that there is a case for more systematic study aimed at providing more secure evidence in these contexts.
29. Missing from the economic appraisal of game shooting in the National Park is consideration of the implications of shooting rights for asset values. Shooting rights raise land rents and prices. Because land in particular is effectively in fixed supply, any variations in the value of what it produces, of which game shooting is an example, will be reflected in adjustments to land values – no game shooting, lower land prices. Given the extent of game shooting in Exmoor, the detrimental consequences of it ending completely could be very considerable indeed. Nowadays, Exmoor is considered to be a premium national venue for shooting, and increasingly so internationally. Shoot rents are higher than the national average. One view expressed was that the high price paid per bird shot and numbers of birds shot are probably at the upper limit for revenues that can be earned. In other words, the scale of Exmoor commercial game shooting may have reached its economic limit. Post-Brexit agricultural policy needs to be borne in mind, because ending direct income payments to farmers could well cause some of them to look to game shooting as a new enterprise.
30. Owing to the claimed sensitivity of commercial information, it was only possible to gain a general appreciation of governance and financial arrangements. In outline, commercial shoots typically have a corporate structure in which partners and shareholders serve as providers and underwriters for financial capital. Their objectives were said to be to provide recreation and hospitality, not to make profits. Neither are they concerned with local politics and pressures. Boards of independent directors contract with a company responsible for managing shooting operations for a fee, and for employing keepers, beaters, pickers up and so on. On any commercial shoot day as many as 30 mainly part-time staff will be employed.
31. Exmoor shoots validly point to their role as environmental managers, the associated activities affecting the visual landscape, flora and fauna. The UK government's 25-year environment plan, given initial substance as the Agriculture Bill 2018, emphasises natural capital and the production of environmental public goods as never before. Exmoor shoots should investigate the scope for exploiting possibilities for promoting themselves as environmental managers for the countryside as well as recreation providers. At the same time, the negative environmental effects of game shooting cannot be ignored.

Recommendations

- R1. In addition to a natural focus on technical matters relating to management and practice, game shoots operating on commercial criteria may wish to reflect on their approaches to governance and business planning. In particular, consider to what extent might the contract system for paying for shooting days (e.g. birds booked) be modified if numbers of released birds were reduced and contracts adjusted accordingly. The objective of this recommendation is to alert shoots, should that be necessary, to the possibility of heightened public sensitivity to the range of

environmental concerns identified in this paper leading to constraints on what is permitted, thus undermining the viability of game shooting.

- R2. Conspicuous by its absence above is recognition that critics of the effects of commercial game shooting in Exmoor include representatives of syndicates and rough shooting who see their traditional, small-scale activities put at risk by excessive growth of the commercial sector. Any discussion of the future for game shooting in Exmoor should include representatives of those groups. They also share responsibility for maintaining high standards of shoot management, conduct and practice.
- R3. Game shooting ultimately is a national issue. Indications are that society is not in favour of field sports generally, and so what happens in Exmoor – recognised for its exceptional qualities for game shooting - merits careful attention because of potential spillover consequences at national level. Conducting a dispassionate, objective and constructive dialogue aimed at addressing issues identified above, and solving the problems found to have substance, is in the interests of Exmoor's community at large.
- R4. Exmoor National Park Authority has responsibility for the overall well-being of the National Park, its residents and visitors. It should aim to facilitate a review of all dimensions of game shooting with the purpose of seeking to strengthen the economic and social sustainability of the Exmoor communities whose well-being depends on it. At the same time, it should take care not to become the lightning rod for all manner of objections and complaints by taking on responsibilities for which shoots have sufficient incentive to address themselves.
- R5. Now twelve years since publication, the economics component of PACEC (2006) must be updated. The wider implications for asset values and people's employment of banning game shooting nationally should also be investigated. At present, the economics of game shooting on Exmoor must be considered as only partly analysed.
- R6. Exmoor National Park Authority (undated) Guidelines should be revisited and redrafted as a Code of Good Practice. Consideration should be given to publishing certification of individual shoots that they are compliant with good practice. Compliance should be determined on the basis of periodic inspections (the frequency to be decided) by assessors drawn from ENPA, Greater Exmoor Shoots Association (GESA), and the Game and Wildlife Conservation Trust (GWCT). Peer pressure should suffice to encourage good practice, absence of certification speaking for itself.
- R7. Shoots should appoint a local liaison person, both to receive and take action on any complaints but, more importantly, actively to engage with its local community as far as possible to avoid problems arising in the first place - 'communicate, educate, placate'. Currently, game keepers commonly are the first to hear of problems. But they are not always the responsible party qualified able to deal with an issue, nor best equipped for other reasons.
- R8. As a priority, evidence on the environmental effects of fallen lead shot should be investigated, and specifically the implications of findings for Exmoor. Understandably, society is increasingly concerned about the invisible costs of human activities, especially those with both human and animal health implications.
- R9. Review the implications of planning regulations for game shoots, how far they currently are observed in practice, and to what extent revisions may be considered necessary, desirable, and feasible. It became evident during the course of this survey that planning regulations are

considered to be an important issue in relation to what is permissible in relation to game shooting, but perhaps regarded as secondary to other, more pressing, concerns.

R10. In general, research must continue into the wider effects of game shooting, e.g. on other wildlife, especially indicator species, and the impacts of predator control. Some examples drawn from an abundance of published scientific reports are given below, including those funded from Exmoor sources. On the past evidence of those Exmoor contributions alone, local shoots take their responsibilities seriously. Consequently, there is reason for optimism that the problems outlined in this paper can be satisfactorily resolved to the benefit of all concerned.

References

Brewin, J. and Dimpleby J. (2018) *The Knowledge – Every Gun’s guide to conservation*. Game & Wildlife Conservation Trust.

Exmoor National Park Authority (undated) *The Exmoor Guidelines for the management of game birds in the National Park*.

GWCT (2016) *Lead ammunition: Your essential brief*. Game and Wildlife Conservation Trust, Fordingbridge.

Madden, J.R., Hall, A., and Whiteside, M.A. (2018) Why do many pheasants released in the UK die, and how can we best reduce their natural mortality? *European Journal of Wildlife Research*, 64: 40. June

Mustin, K., Newey, S., Irvine, J., Arroyo, B., and Redpath, S. (2012) Biodiversity impacts of game bird hunting and associated management practices in Europe and North America. The James Hutton Institute, Aberdeen

Natural England (2009) *Management for lowland game birds*. Research Report NERR030. Chapter 10.

PACEC (2006). *The Role of Game Shooting in Exmoor*. A report prepared by PACEC on behalf of the Exmoor National Park Authority.

Pain, D.J., Fisher I.J., and Thomas, (2009). A global update of lead poisoning in terrestrial birds from ammunition sources. *In* R. T. Watson, M. Fuller, M. Pokras, and W. G. Hunt (Eds.). *Ingestion of Lead from Spent Ammunition: Implications for Wildlife and Humans*. The Peregrine Fund, Boise, Idaho, USA. [DOI 10.4080/ilsa.2009.0108]

Pressland, C.L., (2009) *The impact of releasing pheasants for shooting on invertebrates in British woodlands*. A dissertation submitted to the University of Bristol in accordance with the requirements of the degree of Doctor of Philosophy in the Faculty of Science School of Biological Sciences, October

Sage, R. (2018) *Impacts of pheasant releasing for shooting on habitats and wildlife on the South Exmoor estates*. Game & Wildlife Conservation Trust.

End