

WILD MOORS WRITTEN EVIDENCE

SCOTTISH GOVERNMENT CONSULTATION

Wildlife Management (Grouse) Bill

December 2022



WILD MOORS

Introduction

- Wild Moors is a campaigning organisation that works with governments, communities and companies to unlock moorland from grouse shooting for the conservation of wildlife and habitats. We welcome the opportunity to respond to the Scottish Government's consultation on reforming the way upland landscapes are managed through the provisions being considered for inclusion in the Wildlife Management (Grouse) Bill.

Consultation Questions

Section 1 - Licensing of Grouse Shooting

1. Do you agree that the licensing of grouse shooting should be introduced to deter raptor persecution and wildlife crime linked to grouse moor management?

- Yes

2. If you answered 'No' to question 1, please state which other option/s you think we should consider.

- N/A

3. Do you agree that the landowner/occupier/person responsible for or accountable for the management decisions and actions should be responsible for acquiring and maintaining a licence for the taking of grouse on a particular piece of land?

- Yes

4. If you answered 'No' to question 3, please state which other option/s you think we should consider.

- N/A

5. Do you think that the person wishing to shoot grouse on land that they do not own, or occupy, should be required to check that the person who owns the land has a licence for the taking of grouse on that area of land?

- Yes

6. If you answered 'No' to question 5, please state what other option/s you think we should consider.

- N/A

7. If we introduce a licensing scheme, do you agree that NatureScot should be the licensing authority?

- Yes

8. Do you think that a licence should be granted for a maximum period of one year (renewable on an annual basis thereafter)?

- Yes

9. If you answered 'No' to question 8, please state what other option/s you think we should consider.

- N/A

10. Do you think that the civil rather than the criminal burden of proof is an acceptable test for the application of sanctions in relation to grouse moor licences?

- Yes

11. If you answered 'No' to question 10, please state what other option/s you think we should consider.

- N/A

12. Do you agree that record keeping or reporting requirements should be part of the licence conditions?

- Yes

13. If you answered 'No' to question 12, please state what other option/s you think we should consider.

- N/A

14. Do you agree that, where a person holds a valid licence, and there is sufficient evidence to show that, on the balance of probabilities a wildlife crime has been committed on their property, NatureScot should have the power to impose the following penalties: Issue a written warning, Temporary suspension of licence, or Permanent suspension of licence.

- Yes

15. If you answered ‘No’ to question 14, please state what other option/s you think we should consider.

- N/A

16. Please provide any further comments on the questions in this section here.

- Wild Moors is fully supportive of the Scottish Government’s intention to licence grouse shooting moors to help tackle wildlife persecution and environmental damage in the uplands. There is a growing body of ecological evidence showing that management of moorlands for grouse shooting — which includes the trapping, snaring and shooting of competing wildlife, illegal persecution of birds of prey, burning of heather on fragile peatland habitats and non-therapeutic use of medicated grit — is driving widespread environmental changes across the uplands¹. In many instances these unsustainable practices are being deployed for the sole purpose of maintaining and increasing the population of red grouse available for sports shooting.
- The licensing of grouse moors provides the Scottish Government with an essential regulatory mechanism for migrating large areas of uplands from an ecologically-degraded state to a healthy and functioning ecosystem through providing penalties for the use of environmentally harmful and sometimes illegal practices. In addition, grouse moor licensing would allow the Scottish Government to prescribe nature-friendly management interventions, such as peatland restoration, native woodland expansion and conservation of heathland, as part of the conditions of operating. This brings with it the realistic potential for grouse moor licensing to help unlock a broad portfolio of public goods from upland landscapes which can only be provided by nature-friendly and climate-conscious moorland management, not least carbon storage, biodiversity, flood mitigation, wildfire prevention and the provision of clean drinking water. With estimates showing that between 12-18% of the land area of Scotland is used for grouse shooting², any continued burning of

¹ Thompson, P.S., Douglas, D.J.T., Hoccom, D.G., Knott, J., Roos, S. and Wilson, J.D. (2016). Environmental impacts of high-output driven shooting of Red Grouse. *Ibis* 158: 446-452.

² Scottish Government (2014). *The Land of Scotland and the Common Good*. Report of the Land Reform Review Group, Edinburgh.

peatlands or legal and illegal persecution of wild animals can only serve to undermine the Scottish Government's commendable intentions to strengthen the protection of wildlife and the environment. In other words there is no route for Scotland to meet its ambitious targets to achieve carbon net-zero by 2045 or halt the decline of biodiversity by 2030 and reverse it by 2045 without first introducing a robust and ambitious grouse moor licensing system.

- We welcome the Scottish Government's proposal for grouse moor licences to be valid for a period of one year, after which each individual licence should be reviewed. Wild Moors believes that licences should automatically prohibit the most intensive of grouse moor management practices: the burning of heather, the non-therapeutic use of medicated grit and the killing of foxes, stoats, weasels, corvids and other animals for the purpose of increasing grouse numbers for sports shooting. However, in the alternative we would fully expect the Scottish Government to make a provision for mandatory reporting requirements which requires all grouse moors to produce an annual return providing a breakdown of how many grouse have been shot in each season, the number and species of wolf animals killed for predator control and the method of killing, the number of times and location where burning has been performed, and the amount of medicated grit deployed.
- The link between grouse moors and wildlife crime has a long history and is well established³ ⁴ with regular incidents of birds of prey having been trapped, poisoned, shot or vanishing under suspicious circumstances on Scotland's shooting estates continuing up until the present date. This fact was recognised by the National Wildlife Crime Unit (NWCU) when it stated that "*intelligence continues to indicate a strong association between raptor persecution and grouse moor management.*"⁵ While acknowledging that attitudes can and do change, there is a significant sense of unease from Wild Moors about any potential eligibility for licences for grouse moors where wildlife crime has taken place in the past five years unless it can be shown

³ RSPB. (2018). The illegal killing of birds of prey in Scotland (2015-2017). [Online]. Available at: https://community.rspb.org.uk/cfs-file/__key/communityserver-blogs-components-weblogfiles/00-00-00-08-74/The-illegal-killing-of-birds-of-prey-in-Scotland-2015_2D00_17-Report.pdf [Accessed 11/12/2022]

⁴ Newton, I. (2021), Killing of raptors on grouse moors: evidence and effects. *Ibis*, 163: 1-19. <https://doi.org/10.1111/ibi.12886>

⁵ NWCU. (2013) Strategic assessment 2013. [Online]. Available at: <https://www.nwcu.police.uk/wp-content/uploads/2014/04/NWCU-Strategic-Assessment-2013-final-v2.pdf> [Accessed 11/12/2022]

that the illegal persecution of birds of prey and other protected species has since been categorically ended.

- Where there is evidence suggesting that a shoot has failed to follow the conditions of its licence then the licence should be restricted or withdrawn, even if the evidence pointing to a breach is less than sufficient to merit criminal proceedings. This lower burden of proof — one based on a balance of probability — was affirmed for use in circumstances such as these by Lord Armstrong in the case of *Raeshaw Farms Ltd v Scottish Natural Heritage*⁶ and addresses the current challenges with enforcing nature conservation legislation by allowing for action to be taken where it can be shown that wildlife crime or environmental damage is more likely than not to have been performed on an area of land.
- What will also make a real difference is strong enforcement and increased resources for those agencies responsible for overseeing the implementation of grouse moor licensing. Passing legislation is not the same as actually making a difference to nature's recovery and the welfare of wild animals. Indeed, without effective enforcement of licensing it could merely mean a continuation of the problems with grouse moor management which the Scottish Government is seeking to address. For enforcement to be effectively resourced we feel that the Scottish Government should be prepared to introduce a licensing fee for grouse moors to contribute financially for compliance monitoring and enforcement.
- Wild Moors warns against limiting the licensing system to 'driven grouse shooting' and urges it to cover all forms of grouse shooting in order to avoid the realistic potential for loopholes to be exploited by shooting estates to bypass licensing requirements.
- In conclusion, by introducing a robust system of grouse moor licensing Scotland will show leadership on protecting and restoring the nation's rich natural heritage and set a strong example for England and Wales to follow in addressing the ecological

⁶ *Raeshaw Farms Ltd v Scottish Natural Heritage* [2017] CSOH 50

damage experienced as a consequence of grouse moor management across the UK's uplands as a whole.

Section 2 - Muirburn

17. Currently a licence is only required to undertake muirburn outside the muirburn season. Do you agree that a licence should be required to undertake muirburn regardless of the time of year that it is undertaken?

- Yes

18. If you answered 'No' to question 17, please outline why you believe this.

- N/A

19. If we introduce a licensing scheme, do you agree that NatureScot should be the licensing authority?

- Yes

20. Do you agree that there should be a ban on muirburn on peatland unless it is done under licence as part of a habitat restoration programme approved by NatureScot?

- Yes

21. Other than for habitat restoration, public safety (e.g. fire prevention), and research, are there any other purposes for which you think muirburn on peatland should be permitted?

- No

22. Do you agree that the definition of peat set out in the muirburn code should be amended to 40 cm?

- No

23. If you answered ‘No’ to question 22, please outline why you believe this

- The landscapes of the Scottish uplands vary greatly and it is vital that any legislation includes a workable definition which enables an end to muirburn on deep peat, shallow peat and soils with peaty pockets. Without an ‘all of the above approach’ instead of restricting the scope of regulation to peatlands which are >40cm deep it is difficult to understand how this aspect of the legislation could achieve its desired effect of protecting peatlands from being damaged by muirburn and allowing them to be restored. We further note that the definition of peatland as set out in the consultation would not fully implement the Climate Change Committee’s recommendation to the Scottish Government that burning must be ended on all peatlands and these important habitats fully restored if the UK is going to be able to achieve its ambition to become carbon net-zero (See Question 24).

24. Please provide any further comments on the questions in this section here:

- Muirburn is performed by upland shooting estates to cultivate a mosaic of younger, more nutritious heather for grouse to eat and older, taller heather to provide nesting cover and protection from predators. Wild Moors believes that muirburn should never be permitted for the purpose of maintaining or increasing grouse numbers for sports shooting and that the Scottish Government should deliver on its announcement made in November 2020 that “[t]here will be a statutory ban on burning peatland”.
- Grouse moors are a major land use in Scotland and many grouse moors overlay blanket peat soils⁷. The restoration of peatlands can make a significant contribution

⁷ IUCN. (2020). The state of UK peatlands - update. [Online]. Available at: https://www.iucn-uk-peatlandprogramme.org/sites/default/files/2020-01/IUCN_S~1.PDF [Accessed 11/12/2022]

to carbon sequestration because these habitats are the nation's largest natural terrestrial carbon store, locking in more carbon than all the forests in the UK, France and Germany combined⁸. But when peatlands are burnt for grouse shooting they become degraded causing them to convert from carbon stores into carbon emitters, which has an impact on climate change⁹. As a consequence of intensive management, including burning, NatureScot estimates that around 80% of Scotland's peatlands are in poor condition¹⁰. This is especially concerning when taking into account that many upland peatlands are located in protected areas and landscapes, such as Sites of Special Scientific Interest (SSSIs), Special Protection Areas (SPAs) and Special Areas of Conservation (SACs), where muirburn has been shown to be taking place despite nature conservation designations¹¹.

- It is clear there is no route forward to tackle climate change without restoring the UK's peatland habitats. To this effect, the Climate Change Committee, which advises the Scottish Government on environmental action, has warned that the UK is unable to reach carbon net-zero until each and every peatland is restored, with a further recommendation of a complete ban on grouse moor burning to contribute to this mission¹². There is consensus that muirburn is damaging to peatland formation and makes it difficult or impossible to restore these habitats to their natural state. Additional benefits to be unlocked would include flood mitigation, water quality improvement, enhancement of biodiversity and landscape amenity value.
- The grouse shooting industry has made repeated suggestions that muirburn is an important tool to help reduce wildfire risk in the uplands by pre-emptively removing fuel load. Before examining this issue in any depth it is important to note the expert report by Professor McCracken of SRUC's Hill and Mountain Research Centre which

⁸ ONS. (2019). UK natural capital: peatlands. [Online]. Available at: <https://www.ons.gov.uk/economy/environmentalaccounts/bulletins/uknaturalcapitalforpeatlands/naturalcapitalaccounts> [Accessed 11/12/2022]

⁹ Brown, L. E., Holden, J. and Palmer, S. M. (2014) Effects of moorland burning on the ecohydrology of river basins. Key findings from the EMBER project. University of Leeds.

¹⁰ NatureScot. (2022). Restoring Scotland's peatlands. [Online]. Available at: <https://www.nature.scot/professional-advice/land-and-sea-management/carbon-management/restoring-scotlands-peatlands> [Accessed 11/12/2022]

¹¹ Douglas, D.J.T., Buchanan, G.M., Thompson, P.S., Amar, A., Fielding, D.A., Redpath, S.M. & Wilson, J.D. 2015. Vegetation burning for game management in the UK uplands is increasing and overlaps spatially with soil carbon and protected areas. *Biol. Conserv.* 191: 243–250.

¹² Climate Change Commission. (2020). Land use: policies for a net zero UK. [Online]. Available at: <https://www.theccc.org.uk/publication/land-use-policies-for-a-net-zero-uk/> [Accessed 11/12/2022]

found that there is no current evidence to support the shooting industry's claims, but conversely there is some evidence to suggest that a proportion of muirburn leads to wildfires in the uplands¹³. Wild Moors would go further by suggesting one of the most effective means of preventing wildfires in the uplands is by rewetting peatlands to make the landscape fire resilient and we have seen the results this approach can deliver on Saddleworth Moor in England, where a severe wildfire which started on a grouse moor was extinguished when it hit a wall of rewetted peatland on neighbouring RSPB Dovestone.

- While delivering on the proposal to address burning is important the Scottish Government ought to be prepared for any unintended consequences in the form of burning being replaced by intensive heather cutting to serve the same purpose of creating a mosaic of vegetation to feed and provide shelter to red grouse. Despite being marginally less damaging than heather burning, Wild Moors does not believe that this approach would be sustainable for peatland conservation in the long term. This is because excessive removal of vegetation leaves peatland exposed to the elements, leading to erosion of the fragile habitat¹⁴. As soon as the peat soil is exposed to the atmosphere, it starts emitting rather than storing carbon. With this in mind efforts need to be focused on returning degraded peat bogs back to their healthy wetter state rather than perpetuating unsustainable practices which serve to maintain these dried out and damaged habitats as the heather monocultures which they have been converted into through decades of grouse moor management.

Section 3 - Trapping and Snaring

3.1 Wildlife Traps

¹³ Holland, J.P., Pollock, M., Buckingham, S., Glendinning, J. & McCracken, D. 2022. Reviewing, assessing and critiquing the evidence base on the impacts of muirburn on wildfire prevention, carbon storage and biodiversity. NatureScot Research Report 1302.

¹⁴ Heinemeyer A, Vallack HW, Morton PA, Pateman R, Dytham C, Ineson P, McClean C, Bristow C, Peace-Higgins JW. (2019). Restoration of heather-dominated blanket bog vegetation on grouse moors for biodiversity, carbon storage, greenhouse gas emissions and water regulation: comparing burning to alternative mowing and uncut management. Defra Project BD5104

25. The Scottish Government proposes that a person operating a wildlife management trap must apply for a unique identification number which they must then attach to any traps that they set outdoors, do you agree that this proposal should apply to (select all that apply):

- Live capture traps for birds
- Live capture traps for mammals (except rodents)
- Traps listed in the Spring Trap Approval Order
- Rodent kill traps
- Live capture traps for rodents

26. The Scottish Government proposes that a person operating a wildlife management trap outdoors must successfully complete an approved course dealing with the relevant category of trap, do you agree that this proposal should apply to (select all that apply):

- Live capture traps for birds
- Live capture traps for mammals (except rodents)
- Traps listed in the Spring Trap Approval Order
- Rodent kill traps
- Live capture traps for rodents

27. This question should only be answered if you agree that training should be required for at least one of the traps listed in question 26. The Scottish Government proposes that a person operating a wildlife management trap outdoors must undergo refresher training every 10 years, do you agree that this proposal should apply to: (select all that apply):

- Live capture traps for birds
- Live capture traps for mammals (except rodents)
- Traps listed in the Spring Trap Approval Order
- Rodent kill traps

- Live capture traps for rodents

28. Do you agree that record keeping and reporting requirements should be part of the registration scheme?

- Record keeping
- Reporting

29. Do you agree that an individual found guilty of the offence of:?

- using a trap without valid training from an approved body;
- using a trap without being registered to do so;
- using a trap without displaying an identification number correctly on the trap;
- falsifying records or identification number;
- using a trap on land without landowner permission;
- failing to comply with the duty to keep trapping records.

should be liable, on summary conviction, to imprisonment for a term not exceeding 6 months or a fine not exceeding level 5 on the standard scale (or both). A level 5 fine is currently £5,000.

- Yes

30. If you answered no to question 29 please explain the reason for your answer:

- N/A

31. Please provide any further comments on the questions in this section here:

- The trapping and killing of wildlife on grouse moors forms part of a relentless, year-round campaign, carried out to ensure large numbers of game birds are available for sports shooting. On grouse moors across Scotland, tens of thousands of wild animals—including foxes, stoats, weasels and corvids—are deliberately and

cruelly trapped and killed by shoot operators each year to limit predation on game birds. In principle, strengthening the legislation around the use of traps and holding moorland estates to account in this area is not of itself a bad thing, and Wild Moors has always supported all genuine wild animal welfare measures. But on balance, we do not believe that the proposals made by the Scottish Government on the use of wildlife traps on grouse moors go far enough. The existence of strong evidence demonstrating that predator control is being performed to further the shooting of birds for sport needs to be given due consideration in the policy-making process.

- Jaw-like spring traps are set to crush and kill stoats, weasels and other small mammals across the Scottish uplands. Animals caught in these traps may take many minutes, sometimes even hours, to die from their injuries. It is clear that this killing is having an adverse impact on populations of the small mammals. Ecological research by the Mammal Society has shown that weasel numbers have halved in the last 50 years, leading to scientists calling for stronger protections from threats such as traps amid the species being vulnerable to extinction¹⁵. Even where steps are taken to exclude non-target animals becoming caught, there are still instances of species of red and amber-listed birds and hedgehogs being killed by lawfully-set spring traps¹⁶. Whilst there are no official records on the number of spring traps set on grouse moors, an evidence report claimed “about 2000 [spring] traps” were in operation on the intensively managed grouse moors at Glenogil Estate in Scotland’s Angus Glens¹⁷. When considering that there are around 120 grouse moors operating in Scotland it is clear that the number of traps being used across the uplands is widespread and significant.
- We are also concerned that a variety of cage traps are being used for avian predator control on grouse moors to the detriment of wild animal welfare. As would be expected of any wild animal which becomes caught in a trap, corvids often suffer exhaustion and injuries as they make a frantic attempt to escape from being caged.

¹⁵ Coomber, FG., Smith, BR., August, TA., Harrower, CA., Powney, GD., Mathews, F. (2021). Using biological records to infer long-term occupancy trends of mammals in the UK. *Biological Conservation*, Volume 264, 2021, 109362, ISSN 0006-3207, <https://doi.org/10.1016/j.biocon.2021.109362>.

¹⁶ Short, M.J. & Reynolds, J.C. (2001). Physical exclusion of non-target species in tunnel-trapping of mammalian pests. *Biological Conservation* 98(2): 139-147

¹⁷ Hoffmann, D. & W. Rohe (2015): Excursion to Glenogil estate – Scotland 26. IV. – 30. IV. 2015

To increase the likelihood of wild birds being lured into a trap, operators routinely keep a wild-caught decoy bird captive in the cages for days, sometimes weeks, at a time. It is standard practice in the shooting industry for corvids caught in traps to be killed by having their necks broken or having their heads hit against the corner of the trap¹⁸. The extent of lethal bird control on Scotland's grouse moors is unknown as there is no statutory requirement for shooting estates to report the number killed. However, one grouse shooting estate, the Raeshaw Estate in the Scottish Borders, reported in little over a month (between 31 July - 25 August 2016), a total of 1,000 birds (294 rooks and 706 jackdaws) were killed¹⁹. The Royal Society for the Protection of Birds (RSPB) and other wildlife protection groups have also been keen to point to the facilitation of bird of prey persecution using cages traps, including a number of high profile instances of buzzards and other protected species having been illegally captured and killed in them²⁰. In light of wildlife crime being underreported due to the clandestine way in which it is carried out the full extent to which cage traps are used for bird of prey persecution is unknown.

- Wild Moors believes that a legislative approach is the best way to protect wild animals which are at risk of being caught in traps; an approach that prohibits the trapping and killing of wildlife for the purposes of increasing grouse numbers for sports shooting. This is in line with the Scottish Government's sense of duty to have regard for wild animal welfare and its ambitions to halt the decline of biodiversity by 2030 and reverse it by 2045.

3.2 Glue Traps

32. Do you believe that the use of glue traps designed to catch rodents should be banned in Scotland?

¹⁸ GWCT. (2022). Dispatch of trapped birds. [Online]. Available at: <https://www.gwct.org.uk/advisory/guides/multi-catch-cage-use-in-scotland/welfare-release-and-dispatch/> [Accessed 11/12/2022]

¹⁹ Correspondence between Raeshaw Estate and NatureScot in relation to general licence 80497 (dated 06 January 2017) and general licence 82198 (dated 23 January 2017).

²⁰ RSPB. (2022). Cage traps in the spotlight across the UK. [Online]. Available at: <https://community.rspb.org.uk/ourwork/b/investigations/posts/cage-traps-used-to-kill-raptors-across-the-uk> [Accessed 11/12/2022]

- Yes

33. Do you believe that the sale of glue traps designed to catch rodents should be banned in Scotland?

- Yes

34. Do you believe that there should be a two year transition period before the ban on glue traps comes into force?

- No

35. Please provide any further comments on the questions in this section here.

- Wild Moors welcomes the Scottish Government's proposal to ban the use of glue traps and we do not believe there is any reason to delay introduction of this measure. We recognise that the evidence of unnecessary suffering caused by glue traps to wild animals is well established and the inherent risk posed to a range of non-target species by their indiscriminate nature makes this approach necessary and justified.

Section 3.3 Snares

36. Do you agree with the recommendations from the statutory review of snaring that operators should be required to update their records at least once every 48 hours, unless they have a reasonable excuse not to and that these records should be made available to the Police on demand if the police arrive at the location where the records are kept, or within 7 days to the police station?

- N/A

37. Do you agree with the recommendations from the statutory review of snaring that a power of disqualification should be introduced for snaring offences?

- N/A

38. Please provide any further comments on the questions in this section here.

- Snares are anchored loops of wire cable designed to catch foxes around the neck and restrain them until the operator comes to kill them. They are primarily used on shooting estates as part of a relentless, year-round, campaign carried out to eradicate any wild animals which may prey on grouse to ensure a large number of game birds are available for sports shooting. Wild Moors does not believe that the legislative approach proposed by the Scottish Government goes far enough and favours a complete ban on snares, as is currently being introduced in Wales²¹.
- There are numerous animal welfare concerns associated with snares, even when set properly and legally. Animals which are caught naturally panic and suffer when trying to free themselves. Field trials performed into the humaneness of snares on behalf of the UK Government show that they cause prolonged suffering and injuries to captured animals, including breathing difficulties, bruising, wounding and even death²². By their nature snares are inherently indiscriminate in the animals they catch. The UK government's research shows that 75 percent of animals caught in snares are non-target species such as badgers, hares and even pet dogs and cats²³. This is cause for concern in itself, but even more so when considering that grouse moors in Scotland occupy a considerable portion of the territory of the UK's declining population of mountain hares. Ecological research has shown that from 1954 to 1999 the mountain hare population on moorland sites decreased by nearly 5% every year. However from 1999 to 2017 the scale of the moorland declines increased dramatically to over 30% every year, leading to counts in 2017 of less than one

²¹ Agriculture (Wales) Bill 2022

²² Defra. (2008). Determining the Extent of Use and Humaneness of Snares in England and Wales. Defra project WM0315.

²³ UK Parliament. (2012). Data used in compiling 'Determining the extent of use and humaneness of snares in England and Wales' study. [Online]. Available at: <http://data.parliament.uk/DepositedPapers/files/DEP2012-0577/ Document.pdf> [Accessed 11/12/2022]

percent of the original levels in 1954²⁴. It is reasonable to suggest that the use of snares on grouse moors could be contributing to the decline of the species, adding to pressures from other factors such as climate change.

- It is notable that where Scotland has already introduced legislative restrictions on snaring, such as the use of modified designs, mandatory ID tags and training for snare operators, through the Wildlife and Natural Environment (Scotland) Act 2011, these measures have failed to effectively protect wild animal welfare because of the inherent suffering which snares cause to animals which become entangled in them. It is evident that the proposals to introduce tighter controls on snaring as opposed to a ban are insufficient when contrasted with the well-established evidence of unnecessary suffering caused to wild animals by snares and the inherent risk posed to a range of non-target species by their unavoidably indiscriminate nature. Indeed, an approach involving an outright ban on snares to protect wild animal welfare has been backed by the Scottish Animal Welfare Commission (SAWC)²⁵.

For more information please contact:

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²⁴ Watson, A, Wilson, JD. (2018). Seven decades of mountain hare counts show severe declines where high-yield recreational game bird hunting is practised. *J Appl Ecol.* 2018; 55: 2663– 2672. <https://doi.org/10.1111/1365-2664.13235>

²⁵ Scottish Animal Welfare Commission. (2022). Trapping of terrestrial wild mammals using snares: position paper. [Online]. Available at: <https://www.gov.scot/publications/scottish-animal-welfare-commission-trapping-of-terrestrial-wild-mammals-using-snares-position-paper/pages/conclusions-and-recommendation/> [Accessed 11/12/2022]