

Environment and Sustainability Committee

Inquiry into Sustainable Land Management

Response from The British Association for Shooting and Conservation

Our ref:SLMconsultBASC050913

2nd September 2013

Alun Davidson
Committee Clerk
Environment and Sustainability Committee
National Assembly for Wales
Cardiff Bay
CF99 1NA

Response emailed to: ES.Comm@wales.gov.uk.

Dear Mr Davidson

RE: Sustainable Land Management Consultation

The British Association for Shooting and Conservation (BASC) is a representative body for all sporting shooting in the UK. BASC is recognised for its role by government, all the main political parties, statutory agencies and other rural non-government bodies.

BASC has an annual turnover of £8 million and some 130,000 voting members. These include 1,300 affiliated clubs and syndicates.

BASC focuses its efforts on the guidance of public policy and political opinion, setting and promoting high standards and safety, developing opportunity and the responsible ownership of sporting firearms, while promoting practical game and wildlife conservation.

Summary

- We ask the Welsh Government (WG) to enhance shooting sports' contribution to the environment and the ecosystem approach by encouraging the development of responsible land management that promotes shooting in Wales.
- We ask WG to seek out and promote additional opportunities which allow shooting sports to increase their contribution to the ecosystem approach and sustainable land management.

- We ask WG to read our detailed response to Sustaining a Living Wales Consultation in May 2012 as it contains points pertinent to this consultation (copy attached)

On the following pages we address the detailed questions raised in your consultation. We trust our comments will assist you in implementing the ecosystem approach within WG's sustainable land management policy and if we can provide any further information or assistance, please do not hesitate to get in touch.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Ian Danby', with a horizontal line underneath.

IAN DANBY

Head of Biodiversity Projects

CC Meurig Rees, Director BASC Wales

What do we want sustainable land management in Wales to look like and what outcomes do we want to deliver in the short, medium and longer term?

Sustainable land management is where society's immediate needs from the environment are met without compromising the other interests or its long-term capacity to provide all these benefits. Ecosystem services are our best definition of what these needs and interests are – provisioning, regulating, supporting and cultural services, all underpinned by biodiversity.

In Wales shooting sports are worth £73 million to the economy and people who shoot manage over half a million hectares of land for quarry species and wildlife. Shooting sports are an excellent example of how to deliver the ecosystem approach within sustainable land and resource management:

- provisioning services – food production. In 2004 the number of waterfowl and gamebirds shot in the UK¹ was over 19 million, 99% of which were destined for the human food chain. Also over 120,000 deerⁱ were shot by recreational stalkers and over 3.4 million woodpigeon in the course of protecting crops from serious damage. This makes a small but significant contribution to the food requirements of people as this food is secured locally and most often consumed locally.
- cultural services – We know that over 600,000 daysⁱ shooting takes place in Wales each year which provides an indication of how important shooting is for people's appreciation of landscape and biodiversity, recreation, well being and tourism.
- regulating and supporting services – the habitat management and creation provided because of shooting in Wales supports these services. We know that the management of at least half a million hectares of land in Wales is influenced by shooting sports and over 40,000 hectaresⁱ is managed directly for shooting sports. We also know shooters spend over £9.6 millionⁱ on improving habitat and managing wildlife.

We see stakeholders working together at greater landscape scale being essential for sustainable land management – shooting, for example, influences the management of 2 million acres of Wales. Shooting sports are an essential part of gaining that influence. Therefore the shooting community should be regarded as part of the long-term solution to land and resource management. It would be an error for WG to think that the close association of shooting with farming means it would not gain from actively encouraging shooting sports.

What are the barriers preventing us from delivering these outcomes now?

Rural economics

The solution of sustainable land management has to work for the rural economy, for example at the farm/landowners scale. A farm business needs to be viable and so sustainable land management must allow farms to be competitive businesses.

¹ Source: an independent study called *The Economic and Environmental Impact of Sporting Shooting* in 2006 (www.shootingfacts.co.uk)

Tangible value on non-production land which has biodiversity/ecosystem service value

We see putting a value to habitat that provides non-production benefits will become increasingly important as farms are likely to be asked to manage their land to provide ecosystem services.

Science and data

The science underpinning sustainable land management and in especially ecosystem services is still developing. For the latter there is not enough information available outside of the upland model to inform local scale land management decisions. What we do know now is that biodiversity data will be required to inform decisions. This will need to be kept up to date to spot trends and to cover all of Wales.

How do we overcome these challenges?

Rural economics

Shooting sports are one income stream to landowners/farms. Shooting is worth £73 million to the Welsh economy and most of that expenditure happens in rural communities. As shooting relies on sustainable land management and promotes extensive management an increase in shooting sports leads to benefits for sustainability and ecosystem services. **Therefore WG should look to promote and develop shooting sports.**

BASC's Green Shoots programme is BASC's biodiversity action plan for the shooting community (<http://www.basc.org.uk/en/conservation/green-shoots/>) and is highly relevant to the next two challenges. Green Shoots harnesses the efforts of the shooting community to assist in the delivery of Government biodiversity and environmental targets. The success of Green Shoots both in Wales and in other home countries has enabled us to secure financial support from WG through CCW and EAW and now NRW.

Green Shoots is based upon gaining wildlife data from land shot over by BASC members. Our coverage in North Wales is 20% and it has generated over 9,000 biological records from that area. The overlap between SSSI is 32% meaning shooting has the ability to benefit both the protected and wider countryside.

We use this data to undertake conservation projects with partners that achieve government targets for example biodiversity and water framework directive targets. We can do this because shooting is naturally looking to improve habitat, BASC members are keen to do more and BASC has strong leadership and partnerships to make it happen.

To extend our coverage across the UK BASC has developed a new website called Green Shoots Mapping (<http://www.basc.org.uk/en/conservation/green-shoots/green-shoots-mapping/index.cfm>) for BASC members to enter their wildlife observation on a regular basis. This means we will be able to work across all of Wales in similar fashion with the continued support of WG.

Tangible value on non-production land which has biodiversity/ecosystem service value

Shooting sports provide the reason for the retention, management and creation of non-production land in Wales. The benefits for farmers and landowners to have shooting on their land include income, recreation, pest and predator control and cultural reasons. It is worth restating that shooting in Wales spends £9.6 million on conservation each year. Our Green Shoots in North Wales project has enabled the planting of over 70,000 trees and brought marginal land into management for wildlife and species projects at the landscape scale. **Therefore WG should look to promote and develop shooting sports and our Green Shoots programme**

Science and data

Shooting sports will assist WG in ecosystem service development, for example the NERC funded Diversity in Upland Rivers for Ecosystem Service Sustainability (DURESS) study based at Cardiff University and WG's previous consultations on ecosystem services, Sustaining a Living Wales. BASC's Green Shoots programme, especially our Green Shoots Mapping website, will continue to gather biological data and share it with conservation partners. All data we collect from Green Shoots Mapping will be shared on the National Biodiversity Network so it is available to put into models testing sustainable land management and ecosystem services. **Therefore WG should look to promote and develop shooting sports and our Green Shoots projects**

What are the main policy drivers and how can these be shaped to overcome these challenges?

The ecosystem approach is embedded within WG policy and development of work like The Economics and Ecosystems of Biodiversity (<http://www.teebweb.org/>) report will be needed to help highlight what management options required to make the best return for ecosystem services

The next rural development plan for Wales is a key driver for land management choices. Careful attention to the benefits of Glastir on ecosystem services is required. For example the ineligibility of some Tir Goffal prescriptions in Glastir put additional pressure on farms to either absorb the cost of providing habitat for wildlife or avoid that cost by reverting it to full production.

Biodiversity policy must continue to be increasingly incorporated into all WG policies so that losses can be halted by 2020 and the ecosystems can start to have their functions restored.

How we define the key ecosystems and ecosystem services in a way that makes sense for Wales?

It is pragmatic to define the maximum ecosystems scale to be River Basin Management Plans as defined under the Water Framework Directive. Ecosystems are profoundly influenced by water management and the existing legislation means there is a regulatory hook to hang it on.

WG should also look closely at what data is available to assess ecosystem services now and what will be needed in the future. Those taking part in shooting sports have huge knowledge of the species that use the land they access. BASC, through its Green Shoots programme, is getting this knowledge into the public arena by getting it from our members and encouraging them to allow us to share it on National Biodiversity Network. Publication of the data sets required would allow BASC to collect relevant information from our membership.

WG should look closely at what research is taking place in the UK and in Wales to determine what ecosystem services are and how they can be measured.

How we develop a baseline from which to measure progress? This includes how we collect, coordinate and use data to support sustainable land management in Wales.

The shooting community have access to over two thirds of the rural land area and those who shoot have good knowledge over what species and habitats are present on the land they access. BASC is committed to getting access to this reservoir of knowledge and sharing with partners by putting the data onto the National Biodiversity Network (NBN).

BASC strongly believes in supporting the NBN. It has been set up specifically to be the central repository of biological data and if WG require additional data types to be stored then developing the NBN to do this avoids the issue of multiple databases which become uncoordinated.

What incentives we can provide land managers to develop sustainable practices, and in particular, any new sources of investment we can attract to support these?

The Rural Development Plan needs to provide support for the un-profitable elements of sustainable land management. Without this support the chances of getting a high take up of sustainable land management are low.

Promoting the development or enhancement of shooting to land managers is a significant opportunity for achieving higher levels of sustainable practices. Shooting brings income to the land manager, investment in habitat creation for wildlife, a workforce to undertake habitat management (people who shoot manage habitat whereas most farms are short of labour), provision of food and control of pest and predators. These benefits are based on sustainable management to allow shooting year on year.

How we ensure that our sustainable land management policies maintain vibrant rural communities and attract new entrants into the land-based sector?

The next Rural Development plan is the main driver in achieving this.

The most appropriate geographical scale(s) at which we should be delivering sustainable land management policies and practices in Wales?

This must start at the land manager's scale be it small holding or formal farm business. A strategy at the River Basin Management Plan level would also be needed to influence land management choices to benefit ecosystems at that scale.

If there are key actions we can take to deliver short-term 'quick wins' and the actions we should be taking for the long-term?

BASC recommend:

- Developing responsible land management policies that promote shooting in Wales.
- Seeking out and promoting additional opportunities that allow shooting to increase its contribution to ecosystem services and sustainable land management.

Both these actions will bring tangible benefits in the short-term but their major value is that shooting often manages the land for many years. 50 years for a shooting on a particular area of land is quite common. Therefore investing in developing shooting sports provides long-term benefits.

Our ref: Sustaining a Living Wales BASC

25 May 2012

Debbie Westlake
Communication Team
Living Wales Programme
Welsh Government
2nd Floor, CP2
Cathays Park
Cardiff CF10 3NQ

Email: LivingWales@wales.gsi.gov.uk

Dear Debbie,

BASC response to Sustaining a Living Wales

The British Association for Shooting and Conservation (BASC) is a representative body for all sporting shooting in the UK. BASC is recognised for its role by government, all the main political parties, statutory agencies and other rural non-government bodies.

The Association has an annual turnover of £8 million and some 130,000 voting members. These include 1,300 affiliated clubs and syndicates.

BASC focuses its efforts on the guidance of public policy and political opinion, setting and promoting high standards and safety, developing opportunity and the responsible ownership of sporting firearms, while promoting practical game and wildlife conservation.

Key messages

We ask WG to protect shooting sports' contribution to the environment and the ecosystem approach by encouraging the development of responsible land management for shooting in Wales.

We ask WG to seek out and promote opportunities which allow shooting sports to increase their contribution to the ecosystem approach and the specific environmental targets society needs to achieve.

We ask WG to read our detailed response to the Natural Environment Framework Consultation in 2010 as it contains points pertinent to this consultation.

In Wales² shooting sports are worth £73 million to the economy and people who shoot manage over half a million hectares of land for quarry species and wildlife.

Shooting sports are an excellent example of how to deliver the ecosystem approach to land and resource management:

- *provisioning services* – food production. In 2004 the number of waterfowl and gamebirds shot in the UK¹ (*The Economic and Environmental Impact of Sporting Shooting*) was over 19 million, 99% of which were destined for the human food chain. Also over 120,000 deer¹ were shot by recreational stalkers and over 3.4 million woodpigeon in the course of protecting crops from serious damage. This makes a small but significant contribution to the food requirements of people as this food is secured locally and most often consumed locally.
- *cultural services* – We know that over 600,000 days¹ shooting takes place in Wales each year which provides an indication of how important shooting is for people's appreciation of landscape and biodiversity, recreation, well being and tourism.
- *regulating and supporting services* – the habitat management and creation provided because of shooting in Wales supports these services. We know that the management of at least half a million hectares of land in Wales is influenced by shooting sports and over 40,000 hectares¹ is managed directly for shooting sports. We also know shooters spend over £9.6 million¹ on improving habitat and managing wildlife.

Therefore the shooting community should be regarded as part of the long-term solution to land and resource management. It would be an error for WG to think that the close association of shooting with farming means it would not gain from actively encouraging shooting sports.

The consultation listed the key changes required to the current regulatory and management approaches to move towards this new approach. Shooting sports are closely aligned with:

- *identifying the best ways of working with nature to provide environmental, social and economic benefits*. Shooting sports provide an excellent model for how a business and recreational activity provides environmental, economic and social benefits. Encouraging shooting sports will enhance these benefits. The farming community will also benefit from the income generated from leasing and letting shooting.
- *developing the habitats we need for the future rather than simply defending those we have now*. Shooting sports rely on good quality habitat; therefore shooting is a major contributor to habitat management and creation. WG can help shooting continue this contribution by ensuring all grant schemes it provides or supports continue to welcome shooting.
- *partnership approaches that enable wider community engagement*. BASC works closely with the Wales Biodiversity Partnership through our Green Shoots programme

² Source: an independent study called *The Economic and Environmental Impact of Sporting Shooting* in 2006 (www.shootingfacts.co.uk)

(<http://www.basc.org.uk/en/conservation/green-shoots/>). The success of Green Shoots has enabled us to secure financial support from WG through CCW and EAW. Green Shoots projects engage our members in Wales with the delivery of Government biodiversity and environmental targets. For example we have active programmes of work which assist EAW with the achievement of targets under the water framework directive in North Wales.

General questions

BASC agree with the concept of environmental protection and management based on the ecosystem approach.

We will support the principle of local resource management planning for natural resources, but have concerns that the processes of combining the other plans and strategies will be a serious challenge if the resulting plan is to be simple to understand and use.

The development of a national resource plan is welcomed by BASC as long as the local resource management plans compliment it. The consultation said that positive habitat creation is likely to be a long-term solution for addressing pressures on species. This provides an opportunity for engaging with the shooting community, because of their enthusiasm for creating new habitat. BASC would be keen to work with WG to develop a delivery plan.

BASC welcome the streamlining of regulatory regimes to provide better outcomes for the environment and stakeholders.

BASC welcome the development of interactive geographic information systems to make information more widely available. Our own biodiversity programme, Green Shoots, uses this technology via the internet, to collect data from our members. We also share our data with the National Biodiversity Network. Green Shoots has shown how people who shoot can provide valuable wildlife records from privately held land.

BASC welcome the further development of practical evidence gathering, as good information is required to make good decisions.

Detailed points from the consultation.

BASC welcome that WG will lobby the EC to allow for the payment of ecosystem service provision on farmed land. The great challenge with making the ecosystem approach work, is giving the vital ecosystem services a real fiscal value (as outlined in TEEB).

The consultation paper states that: *We will continue to work closely with all stakeholders that are active in the marine environment to strengthen representative engagement on marine planning policy and to encourage the industries who use marine resources to take sustainable approaches based on resilient ecosystems.* BASC welcomes this approach especially as the sport of

wildfowling (shooting of waterfowl) takes place across the majority of estuaries in Wales. This sustainable activity is consented by CCW.

BASC are very interested in the results of the work to be commissioned in 2012 to consider how designations might be re-aligned, updated or rationalised to improve their ability to deliver outcomes for the environment. We trust this will be made publically available.

We trust our comments will assist you in implementing the ecosystem approach in Wales and if we can provide any further information or assistance, please do not hesitate to get in touch.

Yours sincerely

A handwritten signature in black ink that reads "Ian Danby". The signature is written in a cursive style with a long horizontal line underneath the name.

IAN DANBY

Head of Biodiversity Projects

CC Meurig Rees, Director BASC Wales