
Wildfowling Guidance Review

Overview

Natural England is seeking views on proposed changes to the assessment and consenting process for wildfowling on designated sites in England. The proposed changes aim to make the process of wildfowling consents more straightforward, transparent and reflective of the impact and nature of wildfowling.

A large proportion of wildfowling in England takes place on designated sites, which are either notified solely as Sites of Special Scientific Interest (SSSI) or are also either a Special Protection Area (SPA) under the Birds Directive (2009/147/EC) and/or a Special Area of Conservation (SAC) under European Habitats Directive (92/43/EEC) in addition to their SSSI status. These latter sites, which form part of the Natura 2000 network of Europe-wide sites designated and protected for their nature conservation interest, are subject to the provisions of the Habitats Directive which sets out the assessment and decision-making process.

The current wildfowling guidance is attached. The proposed changes are outlined in the questions on the online survey, with extra information and documents attached to the relevant questions.

To begin, please click on "online survey". Thank you.

Why we are consulting

Natural England is seeking views on proposals relating to the assessment and consenting of wildfowling on designated sites in England. The proposals seek to provide:

- increased opportunities for wildfowling clubs to feed into the assessment process;
- closer alignment of consents with the bird numbers on the site;
- greater potential for positive management to be incorporated into agreements.

By gathering comments and evidence from wildfowling clubs, representative bodies and other interested parties on the proposals through this consultation process, it is hoped

that the propositions can be taken forward in the most effective form and secure the best environmental outcomes for the sites whilst still adhering to the necessary legal mechanisms.

Introduction

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Related Information

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1 Are you answering as an individual or on behalf of an organisation?

(Required)

Please select only one item

☐ As an individual ☐ On behalf of an organisation

More Information

The answer to this question will take you to two different pages: individual or organisation, and then on to the rest of the survey which will start at Q7.

Answering as an organisation

After answering these questions, you will be taken to the rest of the survey which starts at **question 7** on "Wildfowling Liaison Meetings".

2 What organisation do you represent?

Please put the name of your organisation in full (Required)

3 What is your email?

If you add your email, you will automatically receive an email when you submit your response.

email

Answering as an individual

If you wish your answers to remain anonymous, you don't need to give your name or email address.

After answering these questions, you will be taken to the rest of the survey which starts at **question 7** on "Wildfowling Liaison Meetings".

4 What is your name?

Name

5 What is your email address?

If you enter your email address then you will automatically receive an acknowledgement email when you submit your response.

Email

6 What is your interest in wildfowling and protected sites?

(Required)

Please select all that apply

- ☐ Wildfowler ☐ Landowner ☐ Neighbour or local to a protected site
☐ Professional ecologist or conservationist
☐ Birdwatcher or other amateur interest in nature ☐ Other (please state)

If "other", please state

Wildfowling liaison meetings

Natural England propose that, if something similar is not already in place, an annual liaison meeting takes place for all wildfowling clubs operating on a designated site.

7 Do you support the idea of annual liaison meetings for all wildfowling clubs operating on a designated site?

(Required)

Please select only one item

☐ Yes ☐ No ☐ Maybe

Please give details as to why you have chosen that option

8 If the proposal for annual liaison meetings is taken forward, which format would you prefer for the annual meeting?

(Required)

Please select only one item

☐ At a club level ☐ At a site level ☐ At a wider landscape level

Comment box - please comment as to why you have chosen that format for the annual liaison meeting

Wildfowling visits

Natural England and British Association for Shooting & Conservation have worked together with wildfowling clubs to offer wildfowling site visits to Natural England advisors. This will enable Natural England advisors to get to know their local wildfowling clubs and gain knowledge as to how the activity is undertaken.

9 Do you support the programme of visits?

(Required)

Please select only one item

☐ Yes ☐ No ☐ Maybe

Please comment on why you have selected that answer

10 Please comment on any improvements you consider could be made to the current programme of wildfowling visits.

Opportunities for clubs to show positive management

From recent user surveys there is a clear indication that individuals and clubs who shoot on designated sites often want to show that their activity is not detrimental to the interest features of the site. They want to be able to highlight, where applicable and where they are able to, how they are helping with the biodiversity and sustainability of the site as a whole.

In light of this, Natural England has been working on outlining site management plans, which not only include operations which require consent but also conservation management and monitoring. These would provide the opportunity for clubs to clearly show the positive activities they are undertaking and ways in which they are contribute to the functioning of the site.

11 Do you support the idea of site management plans which include both activities which require consent and positive management and monitoring?

(Required)

Please select only one item

☐ Yes ☐ No ☐ Maybe

Please comment as to why you have chosen that option

12 Do you have particular examples of positive management and/or avoidance measures which you think could be included within the proposed management plans?



Linking long term site management plans to bird abundance and / or bag return figures

The aim is for some management plans to be longer term where, in the case of a European site, it is meeting its **Conservation Objectives (see fact bank)**; or, in terms of a SSSI, it is in **favourable condition (see fact bank)**, at the commencement of the management plan.

However, it is important to note that the duration of the longer term plans will be dictated by the specific site details. If a site is not meeting its Conservation Objectives or is in unfavourable condition, a plan including positive management can be put in place but it will be for a shorter period.

To safeguard the interest features of the site and to meet the legal requirements under the Habitat Regulations, any longer term plan would need to be based upon an approach which was capable of taking into account new evidence of bird numbers, as these became available, or the condition of the site if this changed. This approach could be based upon bird population abundance at the site scale with the agreement set at a certain level in relation to this total. Consent would be given for wildfowling within the plan up to this level and no further. Sector level trends would need to be considered in the review process to ensure distribution across the site is factored into the consideration.

The population figures would be taken from already published sources, thus making the assessment process transparent, and could be monitored using a five year rolling average peak count figure. NE advisors would work with wildfowling clubs so that the analysis of averages was clear and fully understood. The monitoring would be formally undertaken on a five year basis. Additional monitoring work would better inform our understanding of bird populations and site condition, thereby adding greater detail and understanding to the analysis. Indeed it is hoped that this approach would encourage more monitoring work and site awareness.

Fact Bank - Conservation Objectives & Favourable Condition

The **Conservation Objectives** for a site set out the broad aims or requirements to conserve, restore and enhance the features for which that particular site was designated or classified. In the majority of cases, the Conservation Objectives of a site can be looked at in detail through the supporting Supplementary Advice documents which are publicly available on **Gov.uk** <<https://www.gov.uk/government/collections/conservation-advice-packages-for-marine-protected-areas>> for the majority of European sites.

Favourable condition for a SSSI means that the features for which it was designated are meeting all the site specific monitoring targets. These minimum targets are set out in Favourable Condition Tables for each site. Information on SSSIs including condition assessments can be found at **Designated Site Views** <<https://designatedsites.naturalengland.org.uk/>>

- 13** Do you support the proposal of the validity of long term plans being linked to bird abundance figures at a site level combined with consideration of sector level trends to safeguard the integrity of the site?

(Required)

Please select only one item

☐ Yes ☐ No ☐ Maybe

Please provide details as to why you have chosen that option

14 Do you agree with the baseline being measured from the commencement of the plan if the site is currently meeting its Conservation Objectives or is in favourable condition?

In order to have a threshold against which population abundance can be measured there needs to be a baseline. It is proposed that, if a site is meeting its Conservation Objectives, as detailed in the Supplementary Advice for the site, or is in favourable condition, that the baseline for this purpose is from when the plan is put in place. If a site is not meeting its Conservation Objectives, or is in unfavourable condition, at the commencement of the plan, the baseline would be taken from the numbers at the time of notification (where possible).

(Required)

Please select only one item

☐ Yes ☐ No ☐ Maybe

Please provide details as to why you have chosen a particular option, and if you do not support this proposal, please specify if possible an alternative for the baseline evaluation

15 Do you agree with the baseline being measured from the figures at the time of notification for a site that is not meeting its Conservation Objectives or is in unfavourable condition?

(Required)

Please select only one item

☐ Yes ☐ No ☐ Maybe

Please provide details as to why you have chosen a particular option

16 Would you support the linking of long term management plans to wildfowling bag return figures?

(Required)

Please select only one item

☐ Yes ☐ No ☐ Maybe

Please comment on why you have chosen this answer

17 Two options for long term management plans have been set out; bird abundance figures and bag return figures. Do you have alternative suggestions as to what could be used to ensure that the legal requirements of the Habitat Regulations are met within the long term management plans and the integrity of the site is protected?

Please provide details as to alternative mechanisms and any information to support the proposal



Waterbird population trends

Published population trends of non-breeding waterbirds in the UK (**Frost et al. 2017** [<https://app.bto.org/webs-reporting/>](https://app.bto.org/webs-reporting/)) show that some species of waterbird are decreasing, including some quarry species e.g. pintail, mallard and, more recently wigeon.

Natural England has knowledge around the published evidence relating to non-breeding waterbird declines in the UK, for example that might be occurring as a result of warmer winters leading to shifts in waterbird distribution or where there are concerns around productivity on Arctic breeding grounds. We are also interested to hear the views of partners, clubs and individuals or of any new or emerging evidence that we may not be aware of.

Related Information

Frost et al (2017) <https://app.bto.org/webs-reporting/> [<https://app.bto.org/webs-reporting/>](https://app.bto.org/webs-reporting/)

18 What are your views on these waterbird population declines?

19 Are you aware of any new or emerging evidence or research in this area?

20 What role do you consider wildfowling clubs, their members, and other partners, could play in terms of safeguarding bird populations in the future?

Step-by-step guides to how effect and impact of wildfowling is assessed

Natural England is the competent authority in relation to consenting wildfowling on European sites, and has a duty to assess the impact of wildfowling on designated sites.

Under Regulation 21 of the Conservation of Habitats and Species Regulations 2010 (as amended), otherwise known as “the Habitat Regulations” or “Habs Regs”, Natural England is required to formally make an appropriate assessment of new plans or projects which are subject to the consenting procedures as set out in Section 28 of the Wildlife & Countryside Act 1981 (as amended).

We’d like to make the decisions that are made during the Habitat Regulations process easier to understand. As part of this, we’ve produced a step-by-step guide for the “Likely Significant Effect” and “Appropriate Assessment” stages of the Habitats Regulations process. These stages assess the effect and impact of wildfowling on designated sites.

Step-by-Step Guides

Step-by-Step Guide: Likely Significant Effect

Step-by-Step Guide: Appropriate Assessment

21 Do you think the Likely Significant Effect step by step guide is helpful?

(Required)

Please select only one item

☐ Yes ☐ No ☐ Maybe

Please provide details as to why you've chosen that particular option. If appropriate, please add ways in which the step-by-step guide to the Likely Significant Effect assessment could be added to.

22 Do you think the Appropriate Assessment step by step guide is helpful?

(Required)

Please select only one item

☐ Yes ☐ No ☐ Maybe

Please provide details as to why you have chosen a particular option. If appropriate, please say ways in which the Appropriate Assessment step-by-step guide could be added to.

Data for assessments: sharing club information

In order to make the assessment process for wildfowling as evidence based and efficient, Natural England requests that as much information as possible is included with the notice proposal.

This includes information such as:

- detailed maps
- clear indication of any areas that are managed as refuges
- historic bag returns divided up by species
- numbers of club members
- specific club rules on activity duration
- level of activity, historic and proposed
- access points,.

This information would be used specifically to inform the assessment process and would not be used for any other purpose without prior permission.

23 Would you support the sharing of all the listed information with Natural England?

This would be in order to ensure that the assessment of all wildfowling notices is as well informed as possible, and based on the best available evidence.

(Required)

Please select only one item

☐ Yes ☐ No ☐ Maybe

Please provide details as to why you have chosen an option. In particular, please outline if there is specific information you would not want shared with Natural England, and your reasoning behind your answer.

If you do not want particular information shared, if possible, please provide an alternative way of assessing that aspect of the activity.

Also, provide details of any additional information that you believe could be provided which would be useful to the assessment process.

24 Do you consider it would be useful for information to be collected on wider bird activity during wildfowling visits to get a better understanding of how birds use particular sites?

(Required)

Please select only one item

☐ Yes ☐ No ☐ Maybe

If you consider that this would be a useful exercise and are a member of a wildfowling club please indicate whether you would be prepared to collect this information if a proforma was provided.

Data for assessments: visit numbers

Over the past two years, the concept of visit numbers being provided over a longer period rather than on an annual basis has been trialled with various clubs. This means there is a set level of activity based on historical data for the whole period of the consent, for example 5 or 10 years, so that clubs have flexibility on a year by year basis depending on weather, membership and bird numbers.

25 Do you support the use of visit numbers over a longer period to allow clubs greater flexibility?

(Required)

Please select only one item

☐ Yes ☐ No ☐ Maybe

Please provide details as to why you have chosen this option

Data for assessments: use of direct mortality data

As previously stated in Natural England guidance, providing wildfowling is carried out in a sustainable manner, direct removal of birds from the population through wildfowling should not be a nature conservation issue.

However, on certain sites, concerns have been raised about the direct mortality figures in relation to particular species. Natural England is considering using bag return data, collected from a variety of sites, in order to gain information about what the sustainable removal of birds looks like, in general, across the country.

Natural England also proposes to use the most up-to-date published national population trend data for quarry species (**currently in Frost et al. 2017** <<https://app.bto.org/webs-reporting/>>). By using these sources of data and information, Natural England will be able to better consider a proposal on a site and reach a view about the sustainable removal of birds from the site population.

Related Information

Frost et al (2017) **<https://app.bto.org/webs-reporting/>** <<https://app.bto.org/webs-reporting/>>

26 Would you support the use of direct mortality data to enable Natural England to make a proportionate response to activity levels across the country?

(Required)

Please select only one item

☐ Yes ☐ No ☐ Maybe

Please provide details as to why you have chosen a particular option. If you wish an alternative method of judging the sustainable level of removal of birds from a population to be considered, please provide details and supporting information.

Data for assessments: compiling data across multiple sites

In the recent PhD part-funded by BASC, "*Impact of human disturbance on coastal birds : Population consequences derived from behavioural response*", work was started using individual-based modelling to investigate how site characteristics might influence the impacts of disturbance on non-breeding waders. The work suggested that knowledge about site characteristics might be useful for broadly identifying sites where disturbance issues could be a conservation issue.

27 Do you consider it would be useful to build up information on the environmental factors/characteristics across a range of sites?

For example

For example, data could be collected on the potential for birds and people to overlap in both time and space, alternative feeding areas and habitat maps. This information could then be used to create a tool kit for assessing environmental factors on other sites

(Required)

Please select only one item

☐ Yes ☐ No ☐ Maybe

Please provide details as to why you have chosen a particular option