The National Gamekeepers' Organisation

Keeping the Balance ™

THE IMPORTANCE OF THE HUMANE CABLE RESTRAINT IN PROTECTING AT-RISK SPECIES IN ENGLAND

Compiled by John Clarke and Elaine Vaughan from evidence collated by the GWCT, professional gamekeepers, pest controllers and land managers.

Date: September 2024

Lapwing chick
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"For every complex problem there is an answer that is clear, simple and wrong."

H L Mencken

"In fact, it's worse than that. For a lot of complex problems there is a solution which is clear, simple and not just wrong, but makes things worse."

David Pooler
National Chair, National Gamekeepers' Organisation

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FOREWORD

The wildlife of the UK is being forced into smaller pockets of land due to urban spread and human disturbance. The consequent reduction in food sources and habitat for breeding is placing added pressure on vulnerable species which, in many places, are already in decline.

Supporting at-risk species in the 21st century falls squarely in the hands of man. Balancing nature through the control of predators, such as the fox, is pivotal in stopping their decline – now more than ever.

At the 2023 UN Biodiversity Conference in Australia, the UK Government formally committed to protect and conserve a minimum of 30% of land and sea for biodiversity by 2030, known as 30 x 30. This target is a key driver in attempting to reverse the decline of nature in the UK.

30 x 30 cannot be delivered without the full support of landowners throughout the UK.

On land managed for shooting and conservation purposes, careful habitat management working in tandem with an active predator control programme delivers positive results for nature time and time again. On this land, nature is thriving and is already achieving the Government's desired targets far better than land managed for conservation alone, which tends to rely on the public purse.

Importantly, the successes in conservation and wildlife recovery on land managed for shooting purposes are privately funded.

Feedback from gamekeepers and land managers across the country indicates that they have grave concerns for wildlife and species recovery going forward if gamekeeping and estate management practices are restricted. (Although it is not in the NGO's remit, farmers are also concerned about how to protect their livestock (including lambs and poultry) adequately from fox predation if their last line of defence (HCRs) is removed. More than half of farmers reported the loss of at least one lamb to fox predation in their most recent lambing season. The financial and emotional impact this leaves is significant.)

One essential step towards the recovery of avian prey species is through predator control. To carry this out efficiently and in numbers which will provide positive benefits for vulnerable species at key times of year, the humane cable restraint (HCR) is a proven, valuable and vital component of conservation management.

The loss of the HCR in Wales will almost certainly result in a decline in bird species that flourished before predator control was removed. We believe this will happen in the near future. Further into this report we quote an RSPB survey on the decline of curlew in Wales (see page 27). The survey states that 82 to 95% of breeding attempts failed at the nest stage, with predation accounting for 90% of nest failures. The figures speak for themselves.

The setting of snares (snare-traps) is an emotive issue. It divides public opinion and that of gamekeepers and conservationists. However, the preconceived ideas and opinions regarding snaring are generally outdated, and the snares (snare-traps) of history do not form part of the practice of modern land managers who use HCRs.

Education and explanation regarding modern HCRs must be at the forefront of any discussion around predator control if we are to make headway towards 30 x 30.

Current users of the HCR support the banning of the sale and use of all non-code compliant snares (snare-traps) and believe that self-regulation is the way forward, through a binding Code of Practice and mandatory training in their use.

Cage trapping in rural settings is ineffective leaving the only other available and viable option for fox control to be high calibre firearms.

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Predation covers the length and breadth of the UK from the northern uplands to the South Downs. Those who manage land not suitable for using high calibre firearms (by which we mean a lack of adequate backstop; close proximity to property; the impossibility of shooting foxes on arable land once the crops have grown too high; height of silage, rush pasture and heather within the bird breeding season, and hill fog and mist in the uplands) report that HCRs are the only protection they have to ensure safe breeding areas for the red- and amber-listed ground-nesting birds on their land.

Shooting foxes is an important tool but as the sole method of control it is not as efficient in time, man-hours and cost as using it in combination with HCRs and may not result in the necessary benefits that vulnerable species require.

The removal of HCRs will therefore accelerate a decline in the very species we are all trying to protect.

As a keeper from Wales says in his statement below, it has taken him 28 years to bring the habitat on his estate back to its current state, which now supports myriad species. He believes that Wales is on the verge of escalating the wildlife crisis by removing his ability to protect the very birds the Welsh Government so desperately wants to see thrive. He believes the birds and wildlife currently flourishing on his beautiful rich habitat will be gone within his lifetime.

Sentiment is a powerful emotion, but we cannot let sentiment stand in the way of the crucial conservation efforts delivered by gamekeepers, land managers and pest controllers: conservation efforts that have been shown to halt the nature declines that are still evident across parts of the countryside where predator control is not employed.

We all have a responsibility to protect the countryside, the wildlife and the habitat for future generations, otherwise how do we explain to our grandchildren that we allowed predators to prosper and vulnerable species to become extinct during our lifetime?

Edward Norfolk

Red fox
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EXECUTIVE SUMMARY

The National Gamekeepers' Organisation (NGO) is the representative body for gamekeepers, deer managers and ghillies (fisheries managers) in England and Wales. Since 1997 the NGO has been representing land managers who actively undertake habitat management and restoration by means of predator and pest control, together with moorland and deer management across more than two thirds of the rural land mass. With over 13,000 members, the NGO represents almost all the nation's gamekeepers who carry out essential and legal pest and predator control.

The NGO is made up of 22 regions throughout England and Wales, each with an elected chair to represent members in that area. All chairs are full- or part-time gamekeepers, embedded in the gamekeeping community, and with an in-depth knowledge and understanding of how the countryside is managed to achieve positive results for conservation and wildlife. They are experts in their field, often with generations of knowledge and experience of the land they work.

By their own admission, the Government and Natural England see 30 x 30 as a key driver "*in expanding and improving the UK's protected areas and creating new areas for wildlife, allowing nature to spill over into the wider landscape.*"

The UK Government's commitment to protect and conserve a minimum of 30% of land and sea for biodiversity by 1 January 2030 is, at the time of writing, just 63 months away.

James Markwick, Principal Adviser, Biodiversity Policy, for Natural England wrote on his 2023 blog that:

"*We cannot underestimate how important 30 x 30 is if we are to achieve the ambitions of the Environmental Improvement Plan, particularly reversing species decline by 2030 creating and restoring large areas of new habitat and ensuring people have access to greenspace. 30 x 30 will also be essential in helping to build the Nature Recovery Network, a national network of wildlife-rich places to restore, enhance, increase and connect nature, and enable people to connect with nature.*

If we are successful, 30 x 30 will not only help deliver our species and habitats targets. It will also increase and improve the condition of our protected sites (SSSIs, NNRs, MPAs) – driving positive biodiversity management in Protected Landscapes and beyond. And it will give all of us more opportunities to enjoy nature for our health and wellbeing, as well as contributing to climate resilience and mitigation. If we can get the pipeline starting to flow with quality proposals that can become Other Effective Area Based Conservation Methods (OECMs) it will be a huge achievement. The next few years will be key."

Bold words, and an ambitious plan.

The NGO supports and applauds this, and we know our members play – and have always played - a vital role in maintaining, managing and protecting the precious habitats and wildlife of the UK; but it goes much further than this. The use of HCRs is merely one part of a complicated and necessary matrix of nature conservation, albeit a controversial one. HCRs are a key part of this matrix.

Their removal will have a detrimental and costly knock-on effect in the wider rural economic landscape: the shooting sector delivers £3.3 billion annually to the UK economy (GVA); its associated industries provide an additional £9.3 billion in economic activity within the wider supply chains; the positive social and environmental contributions of the shooting sector also form part of the rich tapestry of the heritage of our countryside and should not be overlooked or ignored.

Undoubtedly, a key part of protecting at-risk species and enabling them to thrive – thus achieving the Government's aims by 2030 – is predator management.

With the only apex predators in the UK which predate foxes being the white-tailed eagle, golden eagle and eagle owl, it falls on man to keep the balance in nature. To do that for the benefit of our red- and amber-listed species we need tools to help us.

These include the HCR.

Oystercatcher eggs
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The UK is a very small island where the human population and urban encroachment all have a negative effect on wildlife. Adaptable species – generally predators – thrive and prosper whereas the less adaptable ones – generally the prey species – decline.

Taking the fox as an example: the fox is indigenous to all of mainland Britain and Ireland, where its fortunes have essentially been determined by man's activities.

Factors resulting in high numbers include:

- Man's alteration of the habitat and thus of the fox's prey species
- The elimination of natural predators
- The introduction of new prey species
- The provision of other new food resources, as in urban and suburban areas

Gamekeepers are the largest privately-funded group of conservationists in the UK with a proven track record of delivering biodiversity net gain through managing and improving habitat and providing a safe haven for game and wider species.

To continue to achieve this, it is important that we retain the use of HCRs to control foxes.

NGO members recently voted in agreement of the statement that it is time to ban the sale of non-code compliant snares (snare-traps) and their use, and that self-regulation through the Code of Good Snaring Practice and using HCR-trained users is the way forward.

In line with modern animal welfare standards many estates, land managers and gamekeepers have already moved away from the non-code compliant snare (snare-trap) in favour of using HCRs and are operating to best practice.

The NGO believes this shows:

(a) The sector is willing to adapt in order to retain this vital conservation tool

(b) The sector is willing and able to self-regulate the use of HCRs through the training already available.

A recent survey by the NGO regarding HCR use and reported in this document reveals:

- In the past five years, 47 % of respondents have taken the Game and Wildlife Conservation Trust's (GWCT) training course (the others may have done the course over five years ago), with 90.4% already having changed to using the HCR.
- 45.9% stated that they use HCRs because the topography, proximity to buildings, or excess cover left them unable to shoot safely on that land.
- 72% of respondents thought that now is the time to ban the sale and the use of non-code compliant snares (snare-traps).

The following document aims to offer a modern, humane solution for controlling predators in the 21st century that will allow the current level of fox control to continue and crucially will protect red- and amber-listed species as they start to recover.

BACKGROUND

For thousands of years, rudimentary snares (snare-traps) were used to catch animals for food or to catch predators of livestock and game.

What are now considered to be “non-code compliant snares (snare-traps)” were, due to their basic design, indiscriminate in what they caught and are no longer used by gamekeepers, farmers, land managers or conservationists who comply with the Code of Good Snaring Practice.

Today, through better understanding and care for animal welfare and with the benefit of science and in-depth research, a more suitable method of fox control has been developed. The HCR allows users to catch the predating fox while reducing the capture of non-target species. It forms a fundamental role in protecting and conserving at-risk species and livestock by modern wildlife managers.

“The HCR is a vital tool in the land manager’s toolkit and were it to be banned I believe that critically endangered bird species would suffer predation levels which would very quickly result in their extinction; it really is that critical.”

Charlie Mellor, Head Gamekeeper, Peppering Estate.

IMAGE ABOVE: The Modern Gamekeeper: Ian Sleightholm, Bolton Castle Estate
Credit: I Sleightholm

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CASE STUDY:

THE PEPPERING ESTATE,
WEST SUSSEX.
CHARLIE MELLOR, HEAD GAMEKEEPER.

The Peppering project has been in operation for just over 20 years, and I have been the Head Gamekeeper for 15 of them.

The late Dr Dick Potts was an internationally-renowned ecologist and conservationist, specialising in the grey partridge. He had been monitoring bird populations on 64 sq. km of the South Downs since 1963 and had witnessed a serious population crash on most of the red-listed farmland birds such as lapwing, skylark, corn bunting, linnet and grey partridge.

In 2003 he approached The Duke of Norfolk, one of the larger landowners in the area and informed him that unless targeted management was implemented sooner rather than later, then most of these species would become extinct.

The Duke, a very keen conservationist, told Dick that this would not happen on his watch.

A management package was put in place following Dick's meticulous recommendations such as significant habitat improvement including wild bird mixes, conservation cereal headlands and flower rich margins.

We also implemented a large winter-feeding programme to aid these species through 'The Hungry Gap'- when natural sources of food are running out at the end of winter and before the new growth of spring, we supplement the shortfall by providing additional feed.

Finally, we implemented the most important, but also the most controversial of the management techniques: a highly intensive and targeted predator control campaign.

The predator species targeted are foxes, corvids and small ground predators such as stoats, rats and weasels.

IMAGES ABOVE: Left: Newly hatched curlew chick from the Curlew Headstart Project. Right: Curlews ready to be released, Curlew Headstart Project. Credit: Charlie Mellor

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CASE STUDY CONT...

As a result of these important management methods, all the red-listed bird species have responded positively resulting in:

- A third of the entire arable nesting lapwing population found across the South Downs are now found on The Norfolk Estate; breeding success is now on average 1.3 chicks fledged per hen.
- Corn buntings are now at an all-time high of around 100 singing males.
- Skylarks are over 500 pairs.
- The grey partridge has gone from 11 birds in 2003 to over 2000 birds in some years and well over 1000 in most years since then.

This report is focusing on the importance of HCRs in fox control, I therefore won't go into too much detail about the other species we control.

The fox is probably our most prolific predator for several reasons:

- The fox will generally kill adult birds of all species incubating eggs and so an entire nesting attempt is taken out with no chance of re-nesting.
- They will also take eggs and chicks of all ages.
- They will cover huge distances to find food.

As conservationists we only have two reliable techniques for fox control available to us: rifle shooting and HCRs.

Rifle shooting is a very successful method, but only at certain times of year, and it is labour and time intensive.

In the spring and early summer when fox predation on ground-nesting birds and lambs is most significant, the cereal crops and vegetation have grown to such a height to make rifle shooting unviable. This is when HCRs are an absolute necessity for wildlife managers, reducing predation pressure on fragile populations of ground-nesting birds. Without HCRs, I am of the firm opinion that fox predation on some of our rarest species would become unmanageable and would result in local extinctions.

The other factor that has become apparent over the last 15 years has been the rising population and increased pressure on vulnerable species from predation by foxes.

I feel it is imperative that people understand how HCRs are very different from non-code compliant snares (snare-traps). HCRs have breakaway swivels which will break if a non-target species (for instance a badger) is caught, allowing them to break free. It also has a stop allowing the HCR to restrain, but NOT strangle a fox. In many ways they are like a slip-lead with a stop used with dogs.

We have a legal obligation to check HCRs a minimum of once per day, ensuring foxes are dealt with promptly. Very often when a gamekeeper approaches a fox in an HCR it is curled up asleep.

At Peppering, we now have a gamekeeper looking after each 1,000 acres who carry out intensive predator control. Despite this, we still lose up to 40% of our partridge stock over winter, much of which would be through fox predation.

In addition, we still lose up to 35% of our hen partridges from the pair count in March through to our brood count carried out in September, again through fox predation.

Following the success from our partridge project, we have recently started a curlew head-starting project on the estate and the early signs are very encouraging with a pair returning this spring and carrying out a nesting attempt.

Just like other ground-nesters, nesting curlews are very susceptible to fox predation.

Our entire team is trained in the use of HCRs, and everyone follows best practice guidelines as set out by Defra.

To summarise, the HCR is a vital tool in the land manager's toolkit and, were it to be banned, I believe that critically-endangered bird species would suffer predation levels that would very quickly result in their extinction.

It really is that critical.

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RED AND AMBER LISTED SPECIES

Ground-nesting species of conservation concern which are regularly predated by foxes are:

Red List

Bewick swan	Dunlin	Lapwing	Short eared owl
Black-tailed godwit	Eurasian curlew	Merlin	Skylark
Black grouse	Grasshopper warbler	Pochard	Twite
Capercaillie	Grey partridge	Ptarmigan	Whimbrel
Corncrake	Golden plover	Ring ouzel	Whinchat
Corn bunting	Goldeneye	Ringed plover	White fronted goose
Cuckoo	Hen harrier	Roseate tern	Woodcock
Dotterel	Herring gull	Ruff	

Amber List

Avocet	Crane	Meadow pipit	Short eared owl
Arctic tern	Great black back gull	Moorhen	Snipe
Bittern	Greylag goose	Nightjar	Stone curlew
Black backed gull	Grey wagtail	Oystercatcher	Teal
Black headed gull	Little tern	Reed bunting	Wheatear
Black necked grebe	Lesser black back gull	Redshank	
Common sandpiper	Mediterranean gull	Shelduck	
Common tern	Mallard	Sandwich tern	

"I find it quite the paradox that the Welsh Government, by the action of banning the use of HCR, is destroying its own policy for nature. I have witnessed all the moors around me fall silent of bird song when fox control is no longer carried out, and I now fear that this estate will be next."

SH Gamekeeper Wales

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THE FOX

The fox, *Vulpes vulpes*, is an opportunistic omnivore. Adaptable, agile and clever. It is a born survivor and will live in a range of habitats.

In the UK the only non-human predators of the fox are the golden and white-tailed eagle, and the eagle owl, species which are mainly restricted to the Highlands of Scotland and isolated patches of northern England. The number of foxes predated is very small and generally limited to cubs.

An individual fox's range, depending on the availability of food, may be as small as 25 hectares or as large as 4,000 hectares. Breeding once a year, they mate in the winter, producing around six cubs in the spring, which are self-sufficient by the autumn.

With a life span of up to eight years in the countryside, an adult fox requires approximately half a kilo of food per day to survive.

Although there are no exact figures, it is generally believed by the UK's Animal & Plant Health Agency (APHA) that the fox population is approximately 430,000 in UK, with around 425,000 cubs born each year.

That's a lot of mouths to feed!

One of the main reasons for fox population numbers not growing to unsustainable levels is due to fox control by land managers, conservationists, farmers and gamekeepers using HCRs as a method of predator control.

Foxes are attracted to urban areas because of the ready availability of food, and populations are often greater in urban areas than in rural areas. Foxes are also drawn to large gardens and high populations of rats and mice. However, foxes in urban areas rarely live longer than four years, compared with up to eight years in the wild. This can be because of road traffic accidents, habitat loss and increased incidents of Sarcoptic Mange.

Recent analysis from Brighton University suggests that approximately 150,000 foxes live in urban areas where road traffic is the chief cause of death.

IMAGES Top - Bottom

Fox taking lapwing eggs

Fox with a hatching curlew egg

Fox with a hatching curlew egg

Fox with a two-day-old curlew chick

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Curlew on nest
©RMBaileyMedia

THE CURLEW

The UK breeding population of curlews is of international importance, with approximately 30% of Western Europe's curlew population wintering in the UK. But there are worrying declines in the breeding population in much of the UK.

In 2015, curlews were added to the Red List on the UK Conservation Status Report. Red is the highest conservation priority, with species on this list needing urgent action.

Curlews are struggling, with big declines in breeding populations and ranges. They urgently need our help. (See RSPB study details on page 27).

Intensive farming practices, drainage and re-seeding are likely contributors to the breeding population decline, but they are heavily affected by nest predators (mainly foxes) who take eggs, chicks and adult birds when they are at their most vulnerable. (See page 9 Case Study: The Peppering Estate).

A number of the NGO gamekeeper members are seeing great success with curlews on the land that they manage. Bolton Castle Estate in the Yorkshire Dales is a prime example of this, and the estate was presented with the 2024 Curlew Conservation Award supported by the National Landscapes and National Parks for its conservation successes.

Bolton Castle keepers and land managers worked closely with the British Trust for Ornithology (BTO) on a research project and liaised with local farmers to safeguard nests and chicks during the breeding season.

Needless to say, the reduction in predation pressure carried out by the keepers has played a huge role in the positive outcomes and highlights the valuable conservation work delivered by the upland estates.

It has been suggested that fencing/electric fencing is an alternative option for protecting vulnerable species during the breeding season. However:

- it is not feasible to fence off the entirety of the British countryside;
- fencing simply moves the problem elsewhere;
- once the chicks leave the nest, they will venture through the fencing making them vulnerable to predation.

LAMBS & POULTRY

In the UK, foxes are considered to be one of the main wild predator species for lambs.

Farmers of sheep and poultry are financially impacted by the predation by foxes and use HCRs to protect their livestock.

Research by the Royal Veterinary College (RVC) has shown that more than half of farmers reported the loss of at least one lamb to fox predation in their most recent lambing season. Another study indicated that predation by wildlife was the main cause of lamb mortality.

The results of this new study by the Royal Veterinary College released on 2 September 2024 have suggested that foxes are the most likely culprit for lamb attacks on Scottish farms. The research was led by Science and Advice for Scottish Agriculture (SASA) in partnership with NatureScot, NFU Scotland and Scottish Land and Estates:

- Postmortem examinations were carried out to confirm if predation was the cause of death, or if the lamb had died from another reason and had then been scavenged.
- DNA analysis was also conducted by researchers to identify what species had been in contact with the carcass.
- The findings revealed that predation was confirmed in 48% of lambs.
- 31% were found to be scavenged after death.
- Predation could not be ruled out in the remaining 21%.
- Fox DNA was found to be present on 87% of the lambs including ALL the lambs that showed evidence of predation.

Sheila George, Wildlife Biologist at SASA said "*...DNA analysis indicated that foxes were responsible where predation occurred. The findings show the importance of taking an evidence-based approach and should help identify appropriate mitigation to reduce future predation risk.*"

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STATEMENT BY
GWYN EDWARDS, WELSH SHEEP FARMER

I farm in North Wales and I am the fifth-generation farmer after I took over the farm from my father.

My farm is nestled among rolling Welsh valleys and the buildings are traditional stone barns with a mix of more modern buildings. Although these are adequate, they are not suited to lamb all my flock undercover, and this proves difficult with the sometimes-harsh Welsh weather.

Sheep play an essential part in the viability of the farm; any loss of lambs through predation is a real financial blow for my business.

The pastures, which are very suited to sheep, are bordered by dry stone walls and hedgerows. The terrain is hilly and not suitable for night shooting due to the poor visibility. For me, the shooting of foxes is also not viable because of time and workload constraints.

One of my biggest problems is the Clocaenog Forest on my boundary to the north of the farm. This large forestry block is home to a high density of foxes which used to be controlled by hounds, but are now left to prosper, causing damage to both my livestock and the local wildlife.

After the ban on hunting with hounds and before the Welsh Government banned the use of snares (snare-traps) for the control of foxes, we used HCRs, in accordance with the Code of Good Snaring Practice, to control fox numbers that regularly predate on our newborn lambs.

I am now very worried for my livestock (and for my finances) as to what will happen in the coming lambing seasons now that we have lost the only viable method to control the increased numbers of foxes.

Losing lambs for any reason is stressful, but to lose lambs to predation is even more distressing, and it has a direct impact on me and my family's financial, physical and mental well-being.

In Wales, we have one third of the total sheep population in Britain - around 8.6 million sheep. The lambing average is 1.5 lambs per ewe. With estimated losses at 1%, that equates to a total loss of lambs to fox predation in Wales at 86,000.

At £130 each for a lamb this equates to an £11.2 million loss to the Welsh farming economy.

(Figures are based on current insurance payouts for losses through dog worrying incidents.)

On farms like mine where night shooting is not a viable option (like many other farms in Wales and across the UK) the only sensible and effective answer to controlling predation by fox in the numbers required is by using HCRs.

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IMPROVED ANIMAL WELFARE STANDARDS

In more recent times, there has been a significant step-change from gamekeepers, farmers and land managers who have embraced better working practices. It is often overlooked that land managers, farmers and gamekeepers have a high regard and care for all animal welfare.

Unfortunately, the public's perception of snaring is generally outdated and incorrect, driven by online activists spreading misinformation and untruths. These false statements lead the public to believe that modern HCRs are barbaric, catch everything and cause a slow and painful death by strangulation. This is categorically not the case, and the NGO is in favour of the banning of sale and use of non-code compliant snares (snare-traps).

There has been a significant improvement in operator standards and design modifications to HCRs which now work to a standard above the Agreement for International Humane Trapping Standards (AIHTS).

Despite the development of high-grade optics, night vision and thermal imagers, many respondents state in the survey contained in this report that shooting cannot completely replace the use of HCRs. This tends to be because of a few specific factors, namely:

- When the vegetation is too high to see or safely identify a fox
- When it is unsafe to walk on uneven ground at night
- When it is not safe to use a firearm, due to a poor or lack of backdrop
- The proximity to houses and property
- Disturbance

When any of these factors prevent safe shooting, the HCR is the only tool that a wildlife manager can use effectively to protect livestock or vulnerable species from fox predation.

If HCRs are deemed to cause unnecessary suffering to foxes, as an organisation the NGO finds it hard to balance this against the widespread misuse of rat poison by untrained members of the general public which results in considerable suffering and a long, lingering death.

The Wildlife Incident Investigation Scheme (WiiS) makes enquiries into the death or illness of wildlife, pets and beneficial invertebrates that may have resulted from pesticide poisoning. The scheme has two objectives:

- To provide information to the regulator on hazards to wildlife and companion animals and beneficial invertebrates from pesticides; and
- To enforce the correct use of pesticides, identifying and penalising those who deliberately or recklessly misuse and abuse pesticides.

During the period covering 2021 through to 2023, 141 foxes were admitted to the WiiS programme. Of these foxes 79% contained background traces of rat poison, and 16% contained enough rat poison to cause a slow and lingering death.

Is it right that one method of control (the HCR) is deemed inhumane by a section of society who do not see the real impact foxes have on our livestock and at-risk wildlife, and see foxes as cute and charismatic additions to their Instagram grid? Yet for another species, the rat, it is acceptable to use poisoning which causes untold suffering and a slow death not only to the rat but to many other species through secondary poisoning?

English partridge
©RMBaileyMedia

DEVELOPMENT OF THE HUMANE CABLE RESTRAINT

In 2003, the Government initiated a consultation on snares and their use. Defra convened the Independent Working Group on Snaring Practice (IWGS) through the UK.

From this the GWCT started the development and field-testing trials of the GWCT breakaway snare (HCR) through two years of trials by 34 professional gamekeepers from across the UK.

The science behind the development of the GWCT HCR was independently peer reviewed, details of which can be obtained from the GWCT.

THE DEFRA SNARES TRIAL

The objectives of the study carried out by the trial were:

i) To establish the extent of use of fox snares and rabbit snares within England and Wales, the circumstances in which the snares are used, and the extent of awareness of the Defra Code of Practice.

ii) Determine the degree of compliance with statutory requirements and with the Defra Code of Practice.

iii) Determine the consequences of key recommendations of the Code of Practice.

iv) Evaluate the humaneness of use of fox and rabbit snares under best practice conditions.

v) Through a combination of (i)-(iv), estimate the total welfare and ecological impacts of the use of snares on target and non-target species.

vi) Report on the voluntary uptake of the Code of Practice and make recommendations for its revision if appropriate.

The findings from this study complemented the findings of the GWCT Breakaway Snare Trial and led to the development of the Defra endorsed 2016 Code of Best Practice and the development of the GWCT HCR that we use today.

Defra's own research showed that a snare design (the HCR) which fully conformed to the technical specifications of their own Code of Practice and had passed the AIHTS standards for a fox restraining device when used in accordance with best practice, adds weight to the argument that they should not be banned.

WHAT IS A HUMANE CABLE RESTRAINT?

Although there are a number of HCRs available, the one designed by the GWCT was rigorously tested by professional managers across the UK as a modern restraint system that exceeds the Agreement for International Humane Trapping Standards, (AIHTS) when operated according to best practice guidelines.

During the study the GWCT designed and used their HCR to target and catch foxes which were then GPS-tagged, released and subsequently caught once again to remove the tags. All were unharmed.

Previously tagged foxes were re-targeted so new tags could be fitted, which illustrates how effective and selective HCRs can be when used in accordance with best practice guidelines.

Few non-target species were retained and were released unharmed, and the specially designed breakaway link allowed others to self-release.

HCR COMPONENT PARTS

Two Swivels: to reduce the risk of the wire twisting and getting a kink in it which could inhibit the free running eye from loosening or could cause the wire to break.

Free running eye: Allows the noose to loosen sufficiently, prohibiting strangulation.

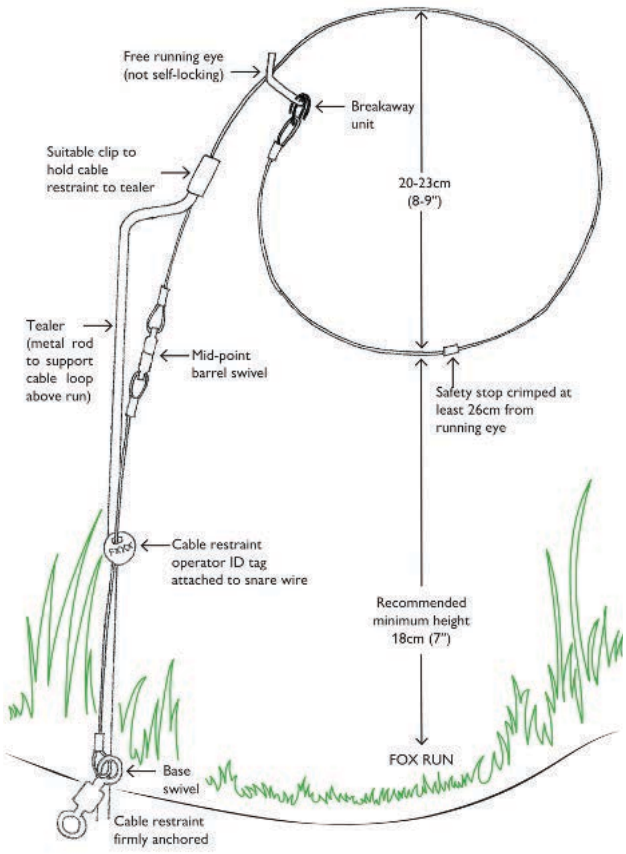
Safety stop: The GWCT's HCR design also incorporates a safety stop which is fixed at 26cm from the HCR eye to prohibit strangulation. This is slightly longer than is recommended in the existing Defra Code of Practice.

The fixed stop not only prevents strangulation, but also aids selectivity by allowing hares to pull out.

Breakaway unit: A split or breakaway link fitted within the HCR noose to allow heavier non-target species such as badgers and deer to self-release.

Sliding clip: Allows the HCR to be attached to a wire support.

The NGO has created an explanatory video on HCRs which can be seen here:



99% OF RESPONDENTS ARE AWARE OF THE DEFRA ENDORSED CODE OF BEST SNARING PRACTICE

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THE CODE OF GOOD SNARING PRACTICE

The Defra Code of Best Practice (CoP), published in 2005 and revised in 2012, is based on the report of the Independent Working Group on Snares (IWGS), a multi-interest group convened at the request of Defra specifically to construct a CoP. The IWGS included vets and animal welfare specialists, alongside representatives from the GWCT, NGO and British Association for Shooting and Conservation (BASC). The IWGS report brought together all the evidence available at that time concerning the use of snares in the UK.

The Defra code was endorsed by the NGO, Tenant Farmers Association, GWCT, BASC, the Moorland Association, the Country Land & Business Association, Countryside Alliance and the National Farmers' Union.

The code has a foreword written by Dr Thérèse Coffey MP, who at the time was Parliamentary Under Secretary of State for Environment Food and Rural Affairs.

The code recognises that the use of HCRs is one part of a range of measures that have to be used to manage some species, the control of which underpins the conservation of wildlife, agricultural production, farm animal husbandry, and the sustainability of wild gamebirds.

At crucial times of the year – particularly spring and summer when vegetative cover renders other measures impractical – the unique effectiveness of modern HCRs is invaluable.

When practised to a high standard and with adherence to the law, the use of HCRs can provide land and wildlife managers with an effective means to restrain target animals before they can be humanely managed.

The code is designed and owned by the sector rather than government. By showing leadership in this area there will undoubtedly be more success in promoting good practice and changing behaviour with the sector's own practitioners than the Government could achieve on its own.

All of those who signed up to the measures agreed that the code would improve animal welfare. It is crucial that we all take responsibility and continue to work together to ensure that best practice is recognised and followed by everyone who uses HCRs.

At this juncture it is worth mentioning that operator practices, together with HCR design, strongly determines welfare outcomes for captives. As the GWCT breakaway trial clearly showed, avoiding entanglement situations is essential. With regards to non-target species, only setting HCRs in locations where there was evidence of fresh fox activity reduced incidents.

In the Defra study, foxes held in HCRs that were inspected twice a day (early morning and late afternoon) were euthanised and inspected by professional veterinary pathologists. The results passed the AIHTS standard for a restraining device for foxes.

By taking this positive action, we can all help protect wildlife which at present is coming under increasing pressure.

The Code of Good Snaring Practice covers:

1. The aim of the code
2. Do you need to snare?
3. Setting and snaring foxes
4. What to never do when setting snares
5. What to do at each inspection
6. Record keeping and legal requirements for using Code Compliant Snares.

The full code of practice can be seen here:

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Golden plover
©RMBaileyMedia

NGO MEMBERS' HUMANE CABLE RESTRAINTS SURVEY

In June 2024 the NGO surveyed its 5,500 gamekeeper and land manager members to ascertain how they used snares/HCRs and for what reason.

The survey asked gamekeepers and land managers 17 questions on how they used HCRs and if they were a valued tool that they could afford to lose.

The results below speak for themselves.

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NGO SURVEY RESULTS

Question 1.

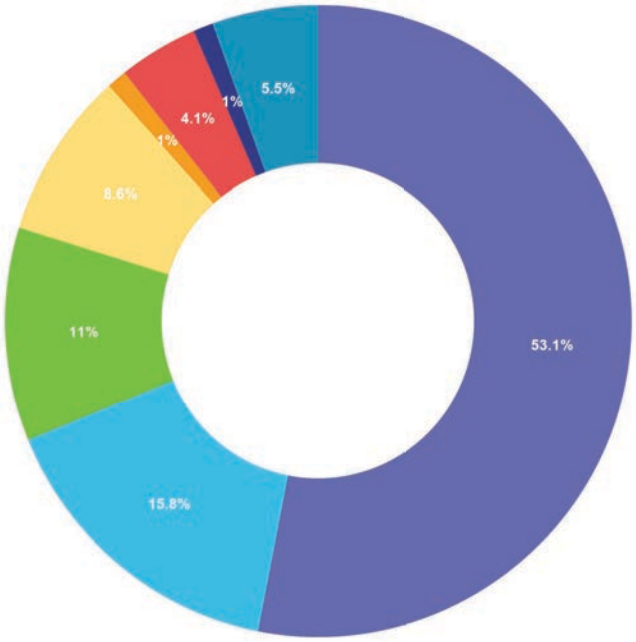
In what capacity do you control foxes?

68.9 % of respondents are full- or part-time keepers who are controlling foxes for both game and conservation purposes. Some of these will also be working with farmers to help protect lambing fields. A further 11% are unpaid amateur keepers who still carry out important predator control to protect game, red- and amber-listed species as well as lambing fields.

5.1% are farmers and shepherds who will be actively protecting lambing fields and/or have a passion for ground-nesting species that breed on their farms.

8.6% are full-time pest controllers who would carry out specific control for farmers or individuals living in both urban and rural settings.

1% are reserve wardens for specific designated conservation areas who are using HCRs to protect sensitive species from predation through the nesting period.



- Full Time Gamekeeper **53.1%**
- Part Time Gamekeeper **15.8%**
- Amateur Gamekeeper / Shoot Syndicate **11%**
- Pest Controller **8.6%**
- Reserve Warden **1%**
- Farmer **4.1%**
- Shepherd **1%**
- Other **5.5%**

90% ALREADY USE CODE COMPLIANT HCRs

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Redshank
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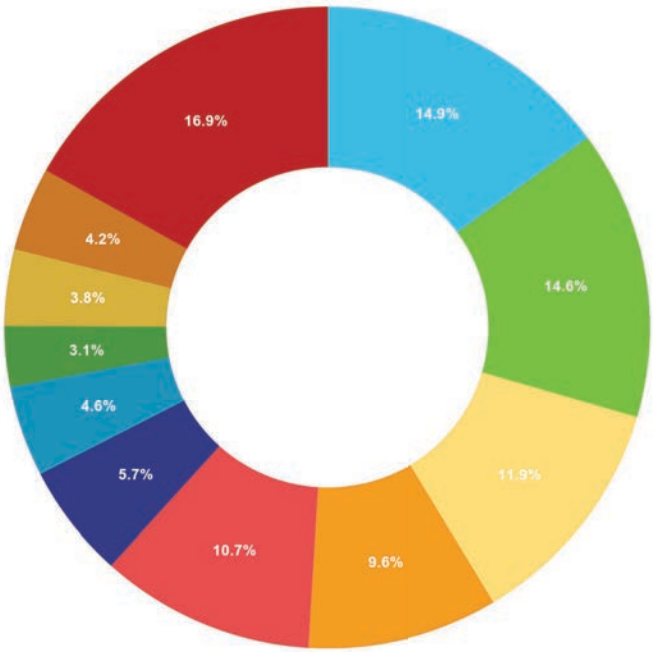
Question 2.

In one calendar year how many foxes do you control via shooting and/or snaring (HCRs) on land that you manage?

16.9% of respondents control over 100 foxes by means of shooting and snaring.

52.1% control between one and 50 foxes a year. The highest percentage controlled between one and 10 foxes a year, which would suggest a very targeted approach.



CHOICE	TOTALS
0	**0**
1-10	**14.9%**
11-20	**14.6%**
21-30	**11.9%**
31-40	**10.7%**
41-50	**9.6%**
51-60	**5.7%**
61-70	**4.6%**
71-80	**3.1%**
81-90	**3.8%**
91-100	**4.2%**
101+	**16.9%**

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Brown hare
©RMBaileyMedia

STATEMENT BY
KJ. HEAD GROUSE KEEPER LANCASHIRE

The HCRs we use on the moorland and moor fringes are essential tools for the control of foxes on the land we manage.

Many upland moors in the South Pennines are surrounded by large towns and cities and have an endless supply of urban foxes moving onto the farmland. This means that fox numbers are ever increasing. This urban influx, added to resident fox populations, would spell a disaster for our red-listed waders if we were to lose the use of HCRs.

On the estate that I manage along with my five under-keepers, curlew numbers are at a good level, as are lapwing and golden plover, short-eared owl, merlin and oystercatcher.

Code-compliant breakaway HCRs, checked within legal guidelines, are the only way to keep this balance and give farmers at lambing time a chance to control foxes. When cover is at its highest, modern thermal imaging and night vision will not suffice, no matter how much time the land manager spends sitting outside with such equipment.

Humans must sleep, HCRs don't. We have all seen old images of non-target species caught in snares (snare-traps) which is very unsettling. Use of a modern HCR and with the correct training and set in the correct way with a breakaway clip makes the modern HCR a humane alternative. An HCR will occasionally catch and hold a non-target species until it can be released without harm. However, I believe that we must have an honest discussion about the future of these red-listed waders in our uplands, and how we can protect them for future generations to enjoy. It is a legal obligation to check HCRs every 24 hours, but best practice suggests that HCRs should be checked twice a day and can be the way forward to show best practice and excellent welfare standards.

We need to find a way forward unless we wish to see decline in these wonderful birds due to predation by foxes. Any experienced moorland manager will have seen the decimation caused by a litter of cubs during spring nesting time. It is no secret: GWCT has the proof that fox control is an essential tool to help save these red-listed waders.

As in other parts of the country there will be local extinctions of these birds without some form of cable restraint as a continued tool in the toolbox. We must question whether an animal held in cable restraint for a short while before release is a price worth paying to save these birds. Perhaps checking HCRs at daybreak as a requirement may be part of the discussion?

Either way the time has come for a sensible common ground to be found.

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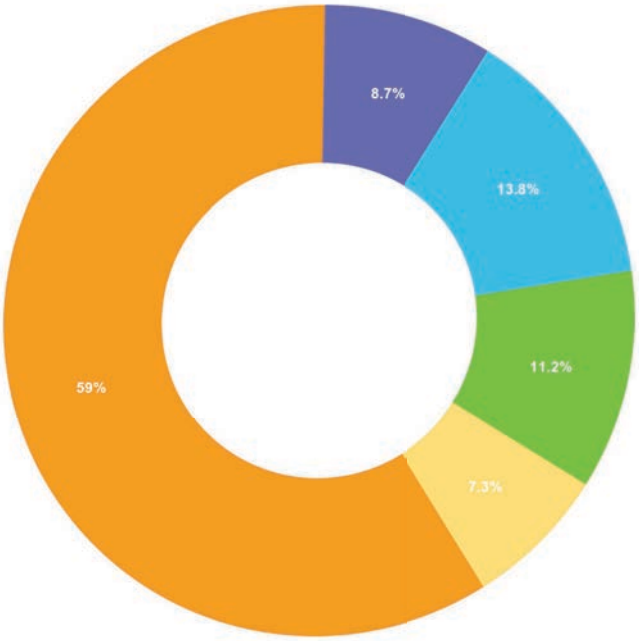
NGO SURVEY RESULTS

Question 3.

What time of year do you control foxes?

59% targeted foxes all year round and an additional 13.8% opted for a specific spring approach to protect ground-nesting birds and lambing fields.

- Winter **8.7%**
- Spring **13.8%**
- Summer **11.2%**
- Autumn **7.3%**
- All Year Round **59%**

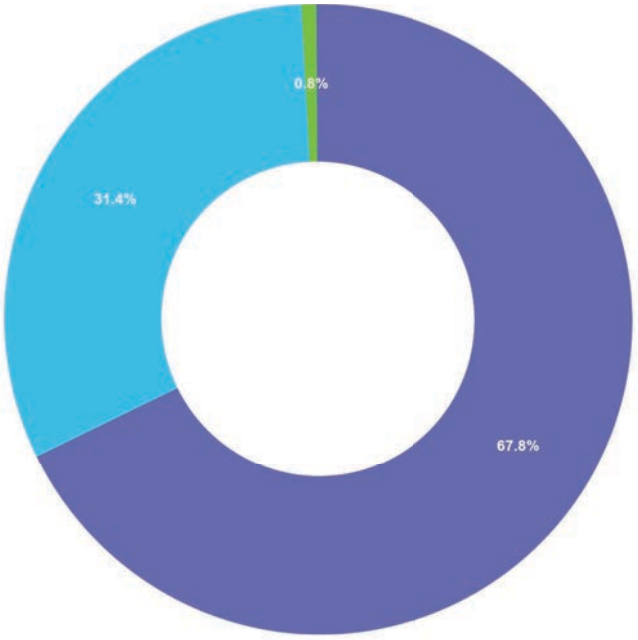


Question 4.

From your records/experience, how do you perceive the fox population to be?

Only 0.8% perceived the fox population to be decreasing. The remaining 99.2% thought that it was either static (31.4%) or increasing (67.8%). This is in mainly rural areas, and does not include the urban fox population, which is believed to be increasing.

Foxes are not uniformly distributed due to their opportunistic habits, but according to the online web page, Wildlife Online *"Current informal and unpublished estimates from The Mammal Society and the Animal and Plant Health Authority (APHA), suggest that the stable (i.e. pre-cubbing) British fox population is around 430,000 animals, while a recent analysis from Brighton University suggests about 150,000 of these live in towns and cities."*



- Increasing **67.8%**
- Static **31.4%**
- Decreasing **0.8%**

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Grey partridge
©RMBaileyMedia

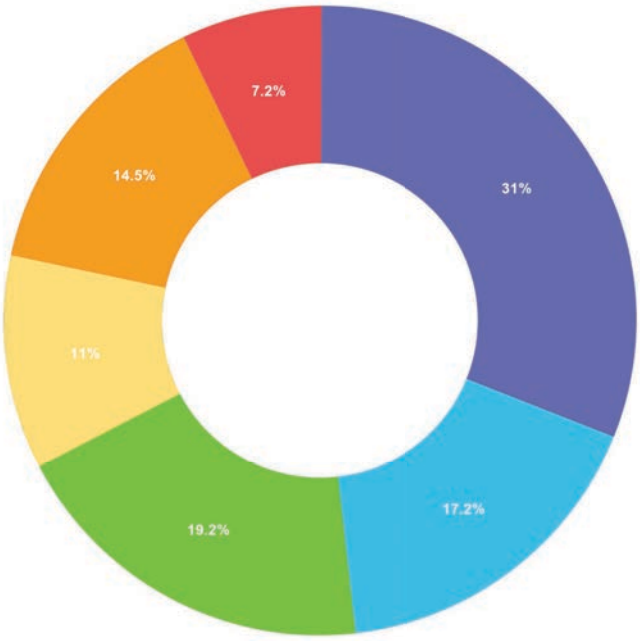
Question 5.

Why would you choose to use snaring instead of shooting?

When using a rifle, as with all shooting disciplines, safety is paramount. 81.9% stated that they opted to use an HCR because of safety issues involved with the safe operation of a rifle on the land they manage due to poor or no backstop, or the proximity to buildings or dwellings.

Another high scoring factor was difficult walking conditions at night which caused a significant safety issue for the land manager.

- Too much ground cover to shoot effectively and safely **31%**
- Unsuitable terrain **17.2%**
- No backdrop (Safety Issue) **19.2%**
- No vehicular access **11%**
- Difficult walking conditions at night, (Health & Safety Issue) **14.5%**
- Other **7.2%**



68% OF RESPONDENTS BELIEVE FOX POPULATIONS ARE INCREASING ON THEIR GROUND

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NGO SURVEY RESULTS

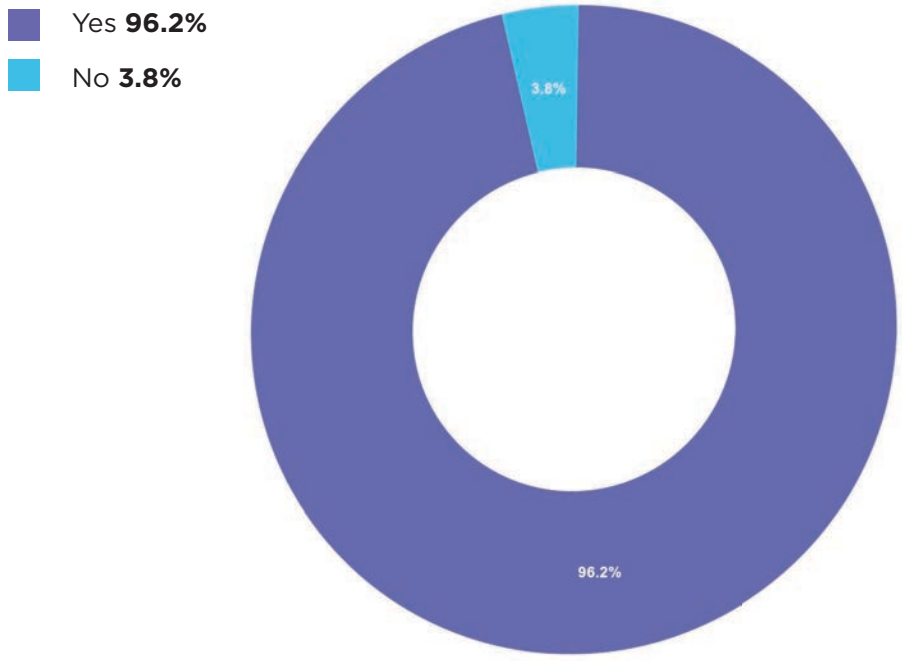
Question 6.

Are the HCRs used to protect ground-nesting birds of conservation concern?

Only 3.8% said that they used HCRs solely for game or livestock protection with a huge 96.2% of respondents saying that they also use HCRs to protect birds of conservation concern. The relevance of a full predator control regime becomes clear from a study by the RSPB carried out in Northern Ireland.

This study was initiated after a 58% drop in the curlew population between 1987 and 1999. The subsequent RSPB study found that between 82% to 95% of breeding attempts failed at the nest stage, with predation accounting for 90% of nest failures (Grant et al, 1999).

The results of this survey highlight that the decline of the curlew is due to the fact that for the curlew population to remain stable, every breeding pair of curlews needs to raise enough chicks to ensure that 0.7 birds per pair, per year, survive to breeding maturity. This is virtually impossible if you lose 82% to 90% of breeding birds and eggs at the nesting stage. This does not include the time after the chick leaves the nest and cannot fly away from predators.



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STATEMENT BY
DP. HEAD KEEPER
MIXED HABITAT ESTATE, NORTH WALES

I have been the head keeper on this estate for 37 years. The estate covers a wide range of habitats: moorland, commercial forestry, arable, ancient deciduous woodland, permanent pasture, large areas of gorse banks and wetlands with large reedbeds.

We have a large number of red- and amber-listed, ground-nesting birds whose numbers have been steadily increasing through targeted predator control using all the legal methods at my disposal. In my early years I used the traditional free-running snare to help with the control of the fox, as well as lamping and foxhounds flushing to guns.

I took part in trialling the GWCT HCR between August and October 2008.

When these devices had passed all the tests that were required for them and they were readily available, lots of us underwent a GWCT course on their correct usage. Since then, I rapidly moved over to replace all my snares with the HCRs which I found very effective and useful.

The ban on fox hunting in 2005 meant that in both the commercial forestry and on the open hill I was left with only the HCR as an effective method of fox control. In my experience, trying to shoot foxes using lamps, infra-red sights or even thermal-imaging telescopic sights is largely ineffective, due to limited range.

Through the late winter and early spring, we tend to be out two to three nights a week with our thermal equipment (which has cost us many thousands of pounds) trying to reduce the number of breeding foxes on the estate, thus reducing the number of litters born each spring. As the vegetation or crops grow, the area we can see is reduced and invariably it is in these areas where our more vulnerable ground nesters breed.

In 2018 I won a Purdey Award for Conservation. This was mainly due to habitat creation, predator control and the increase of meadow pipits, skylarks, grey partridge and lapwing to name but a few, as well as brown hares on the estate.

We now have two pairs of curlews which nest here but unfortunately, they tend to use a field that is bordered by a big block of commercial forestry and a large block of white grass/sedge. This makes spotting and shooting foxes very difficult and extremely time consuming.

With the ban of use of HCRs by the Welsh Government I can only predict the downward trend in these iconic farmland birds and the undoing of 37 years of my work in protecting and increasing the wildlife in Wales.

I have brought my two boys up on the estate, teaching them and showing them how to protect and conserve our fragile environment and teaching them to identify our wildlife. Now I take the same pleasure going out with my granddaughter, seeing her delight this year at watching three lapwing chicks hiding in the grass where last year we only found a clutch of two. How many more years do I have left of doing this?

When I hear that our politicians say that wildlife is in a state of emergency in Wales, I always think not here. However, in the very foreseeable future I think I might be inclined to agree.

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NGO SURVEY RESULTS

Lapwing
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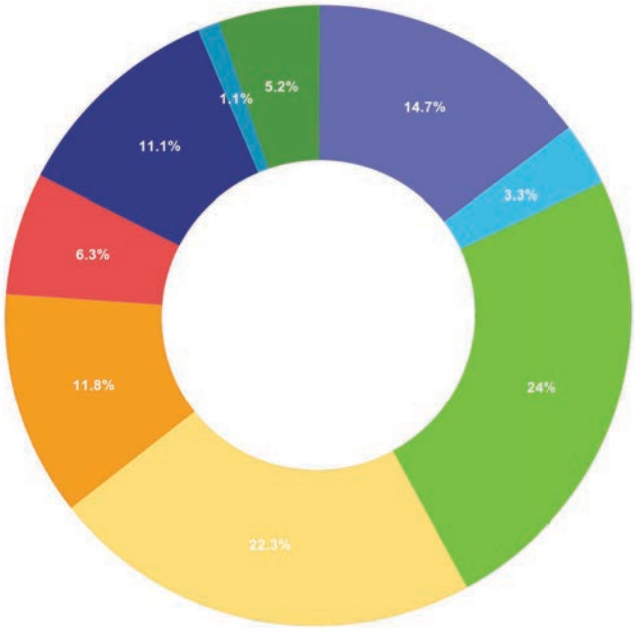
Question 7.

If yes to question 6, what species are present on the ground that you manage?

The highest number of respondents 24% said that they used HCRs to protect lapwings. The second highest reason was to protect the grey partridges. 17.4% of people said that they were protecting hen harriers and/or short-eared owls.

- Curlew **14.7%**
- Stone Curlew **3.3%**
- Lapwing **24%**
- Grey Partridge **22.3%**
- Golden Plover **11.8%**
- Hen Harrier **6.3%**
- Short Eared Owl **11.1%**
- None of the above **1.1%**
- Other **5.2%**



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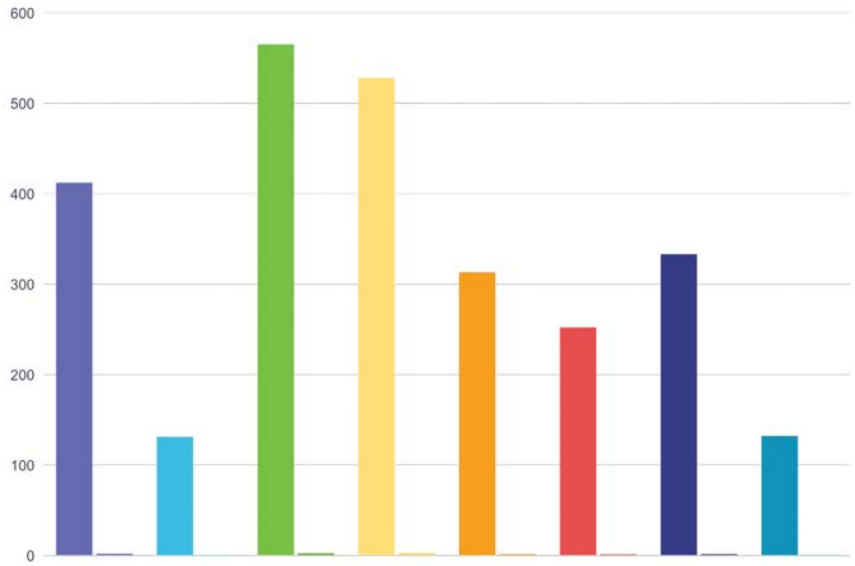
NGO SURVEY RESULTS

Question 8.

Are the following species present on your ground in decline, stable or increasing?

The question asked to rank the species if they were declining from 1 - 5 (1 being declining, 5 increasing). A score of 3 would suggest that the species is perceived to be stable, below 3 would suggest a decline and above 3 would suggest an increase in the species.



Choice	Score	Average	Choice	Score	Average
Curlew	412	1.67	Golden Plover	313	1.28
Stone Curlew	131	0.54	Hen Harrier	252	1.03
Lapwing	565	2.28	Short Eared Owl	333	1.36
Grey Partridge	528	2.13	Other	132	0.55

96% OF RESPONDENTS USE HCRS TO PROTECT GROUND-NESTING BIRDS OF CONSERVATION CONCERN.

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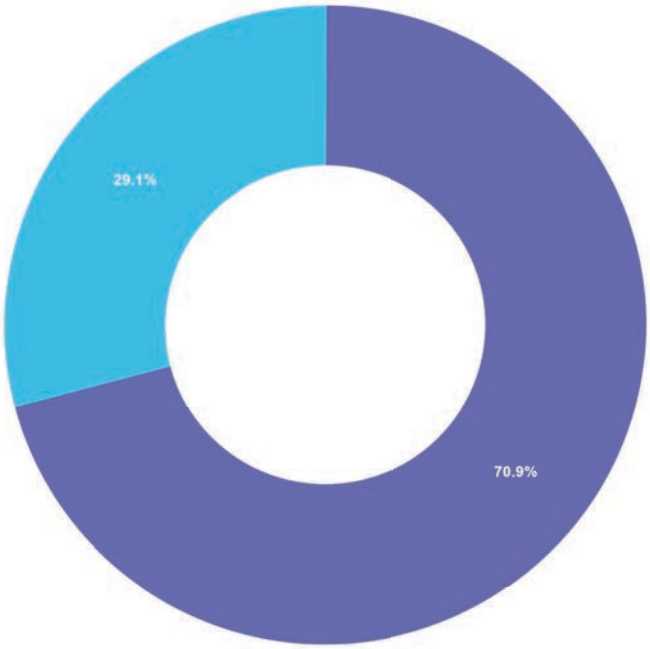
Question 9.

Are HCRs used to protect against a financial loss for game production?

70.9% said that that they do also set HCRs for financial loss, but 29.1% didn't. It must be assumed that these are set for conservation purposes.

Yes **70.9%**

No **29.1%**

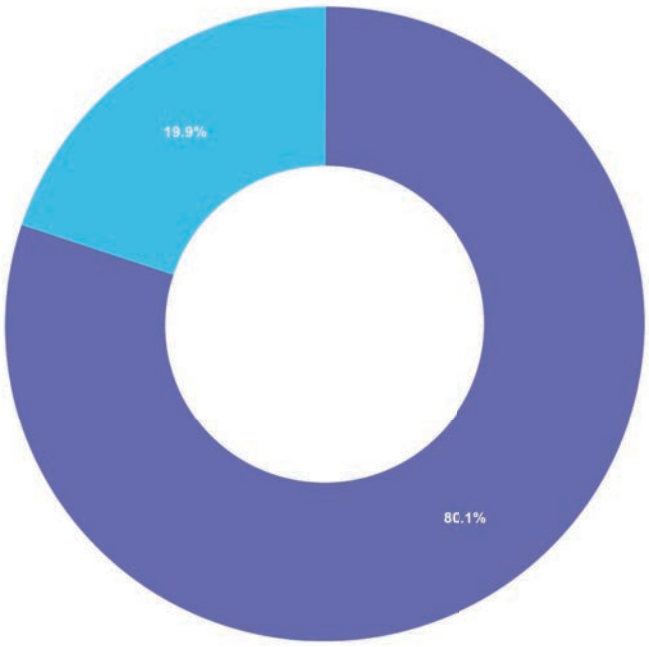


Question 10.

Are HCRs used to protect lambing fields?

80.1% also use HCRs to protect lambing fields.

The responses in Questions 9 and 10 suggest that game production is not the main reason why HCRs are used. As land managers we need the correct tool for the correct situation, not only to protect game stocks, but as this survey suggests, conservation and farming interests feature highly in respondents' reasoning for their use.



Yes **80.1%**

No **19.9%**

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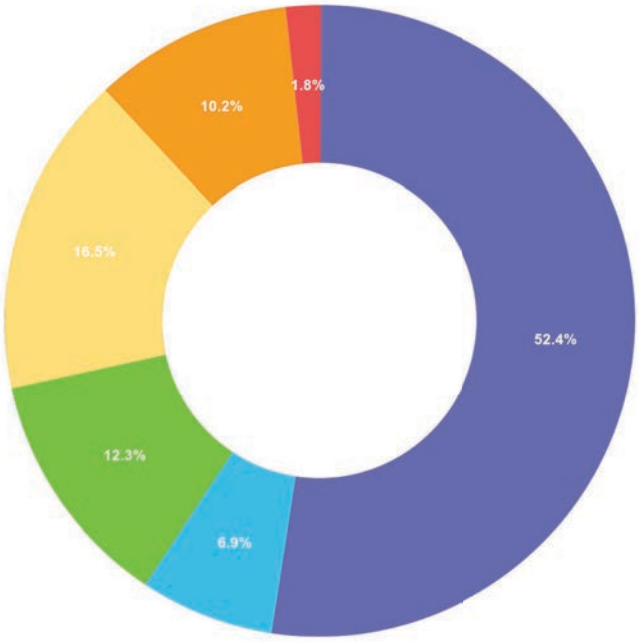
NGO SURVEY RESULTS

Question 11.

If you answered yes to the previous question, is shooting alone a viable method?

Just over half (52.4%) of respondents to the question shoot as well as using HCRs to protect lambing fields. Those who said that they don't shoot cited the reason for not doing so was due to safety. It could be that there is no safe backdrop, too much cover to identify a target safely, or that the fields are too close to buildings or dwellings.

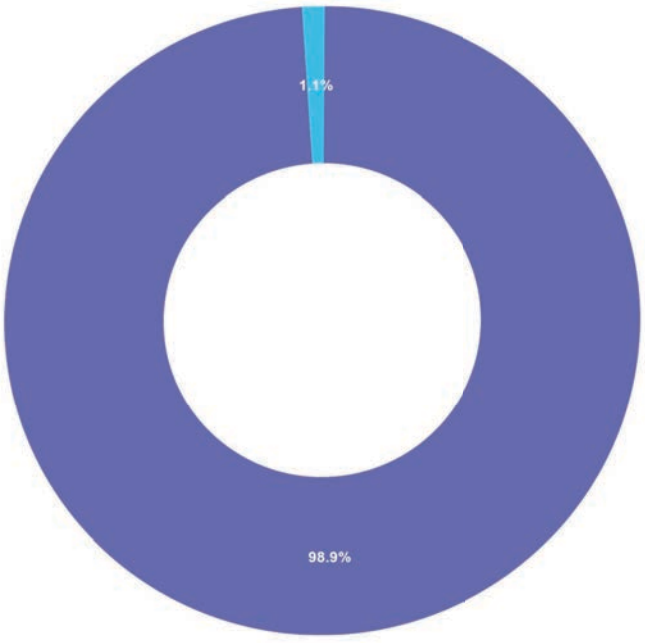


- We shoot as well as use humane cable restraints **52.4%**
- No, It is not safe to shoot **6.9%**
- No, it is too close proximity to dwellings and buildings **12.3%**
- No, there is too much cover to shoot safely **16.5%**
- No, the terrain is too difficult to shoot safely **10.2%**
- Other **1.8%**

Question 12.

Are you aware of the Defra-endorsed snaring best practice code?

A huge 98.9% of the respondents that use HCRs are aware of the Code of Best Practice on the Use of HCRs for Fox Control in England. Again, this proves that the sector is professional and is keeping up to date on best practice.



- Yes **98.9%**
- No **1.1%**

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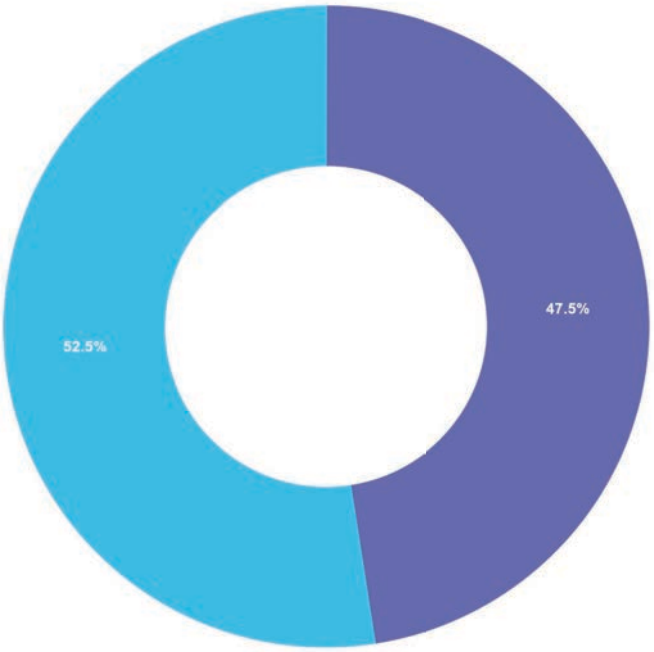

Question 13.

Have you been on a snaring training course in the past 5 years?

47.5% of the respondents have taken a snaring course in the past five years. This does not mean however that the remaining 52.5% have not had any training at all, as there is no requirement to take the course every five years. It is plausible that these respondents may have taken a course more than five years ago.

Yes **47.5%**

No **52.5%**

STATEMENT BY
CB. HEAD KEEPER
LOWLAND ESTATE, NORTH WALES

The estate, totalling 4,000 acres, encompasses a wide and diverse range of habitats, including forestry, pasture, heathland, and wetlands. Some of our wetlands are an important stopping point and breeding site for red-listed migrant wader species such as lapwing and curlew.

I have been on the estate for 14 years. We undertake an active targeted predator control programme annually on the estate.

In my time here, we have seen a resurgence in the abundance of flora and fauna particularly ground-nesting birds

The ability to control foxes using HCRs is paramount in safeguarding these species on key areas of the estate where other means of fox control are unviable and ineffective due to inaccessibility, being bordered by forestry on one side and bordered on two sides where we do not possess the shooting rights.

We currently have successful breeding lapwing and curlew pairs on the estate annually, along with a significantly increasing population of brown hares. I anticipate a decline of these key species this coming spring due to my inability to protect their nesting sites using HCRs.

The National Gamekeepers' Organisation
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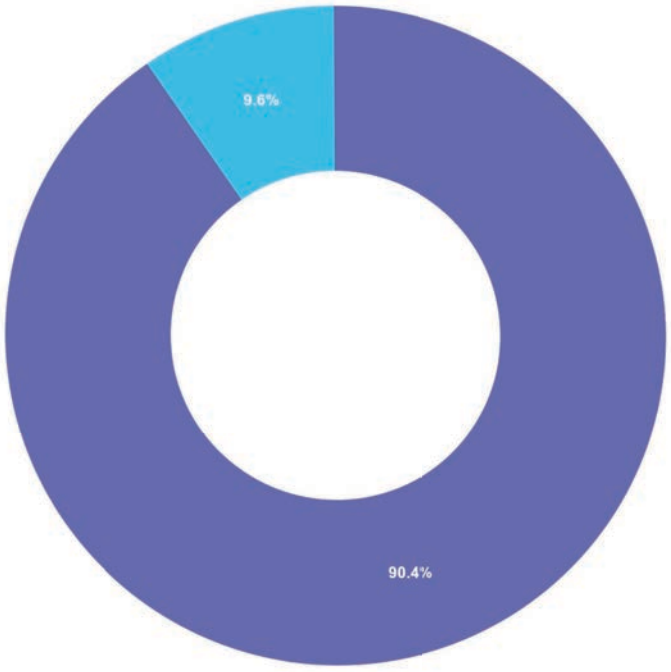
NGO SURVEY RESULTS

Question 14.

Do you use code-compliant breakaway HCRs?

90.4% responded that they have already moved away from non-code compliant snares (snare-traps), have adopted best practice and are already using code-compliant HCRs. This shows a real appetite to move to best practice to retain this vital conservation tool.



Yes **90.4%**

No **9.6%**

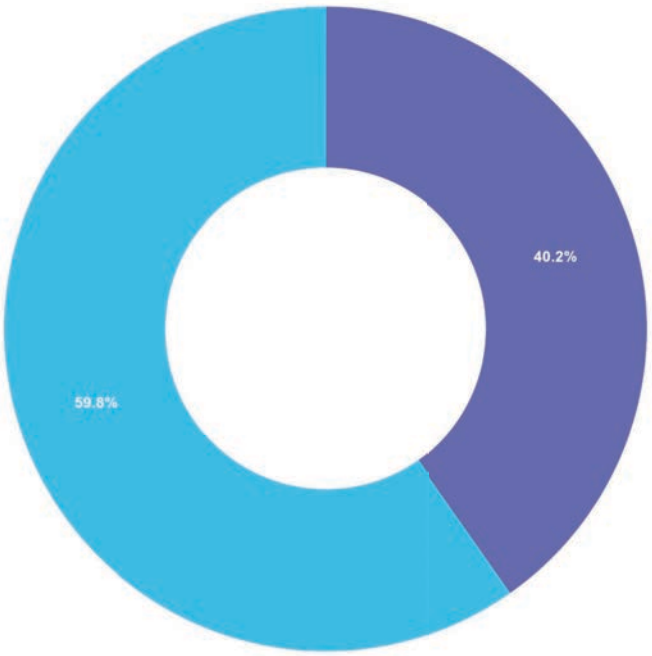
Question 15.

Are your HCRs marked to identify them?

40.2% said that their HCRs are identifiable. We think that this is good practice, and records should be kept so that if an HCR is stolen it can be recorded as such. If it turns up where it shouldn't then foul play can be proved.

Yes **40.2%**

No **59.8%**



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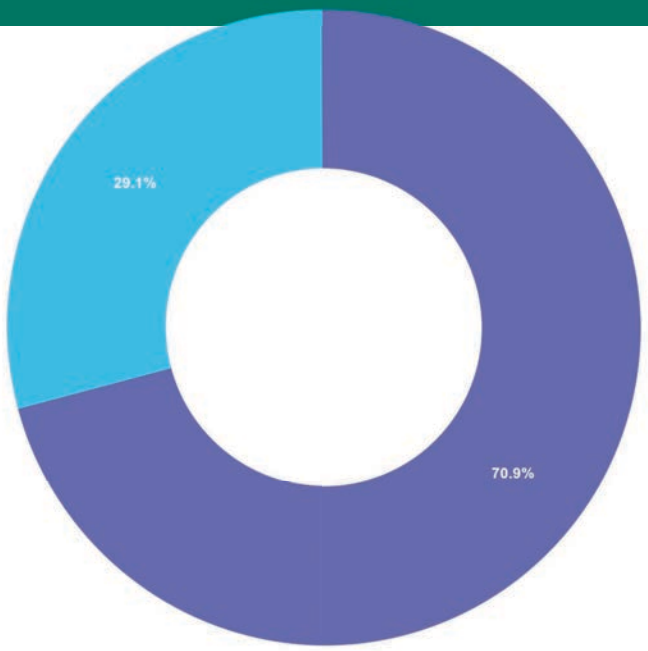

Question 16.

Do you keep records of catches and by-catch releases?

At present 70.9% keep records of catch and release. Again, it shows a willingness by 70.9% of the respondents to adopt a best practice stance before it becomes mandatory.

Yes **70.9%**

No **29.1%**

STATEMENT BY
GROUSE KEEPER, NORTH WALES

I am a gamekeeper as was my father, my grandfather, my great grandfather, and my great, great grandfather before me. Although the role of a gamekeeper has changed over these generations, the passion that my ancestors and I have for wildlife and the countryside remain unchanged. Now my own 12-year-old son is showing a keen interest in the work that I do. I really believe that this way of life is deeply ingrained in my family's DNA.

I have been employed as head gamekeeper on a moor in Wales for 28 years. The moor is comprised of 8,000 acres of heather moorland and had traditionally been managed as a grouse moor. However, when I took the job here all those years ago very little gamekeeping/management had been taking place, and all shooting had ceased due to a catastrophic decline not only in red grouse but all other ground-nesting birds. Wading birds such as curlew were on the brink of extinction and there were only 22 lekking black grouse.

I am employed by a small shooting syndicate made up of local farmers and landowners who all share a passion for shooting and conservation. We have worked tirelessly to create a grouse moor that brings wealth and employment to the area along with a crop of red grouse that is a welcome addition to the local food chain. The estate is starting to become the moor it once was. Wildlife has flourished, ground-nesting birds have returned in encouraging numbers and numbers are growing year on year.

All ground-nesting birds, not only red grouse, have benefitted from our stewardship. The moor now holds 80% of the Welsh black grouse population and the largest population of breeding curlew in Wales. The latest counts in 2023 showed that there are 242 lekking black grouse, 22 curlew nests of which 21 successfully fledged, four nests of golden plover and a plethora of breeding lapwings were found on the farmlands adjacent to the moor. These numbers have only been made possible through the income generated from the sustainable harvesting of red grouse, which pays me to carry out traditional moorland management, including maintaining habitats and controlling predators such as foxes and crows.

Continued...

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STATEMENT BY GROUSE KEEPER, NORTH WALES

Predator control on the moor

Use of HCRs has until recently been an important part of our predator control. In recent years, over 80% of the foxes on the moor have been caught using HCRs, and I would normally remove around 250 foxes per year.

Rifle shooting over this site (even with the addition of thermal imaging) is not possible due to the hilly landscape and dense cover. The weather conditions up on the moors mean that visibility is often poor. My experience has been that it is impossible to have any impact on fox numbers through shooting alone.

When foxes are not controlled effectively this also has a negative impact on the farmers that graze the fell. Losing lambs to predation impacts them financially, and finding lambs and wild birds that have been mutilated by a fox affects us all emotionally.

With the Welsh Government's ban on the use of the HCR, I now fear that all my years of hard work will go to waste, and this will truly break my heart. Without being able to use HCRs I am not able to carry out my work effectively. The added pressure of increased fox predation and not being able to do anything about it has left me feeling rather hopeless. I am worried about the future and if I will still have a job. When the red grouse start to suffer from the effects of increased predation (which they inevitably will), shooting on the moor will cease once again, and I will lose my job and will have to move out of my home, the house that is tied to my job.

The prospect of losing my job is putting a huge amount of strain on my family. My partner moved to be with me 17 years ago and we have made a wonderful life together, our roots are firmly laid in Wrexham. My partner did a degree at Wrexham University and has a good job working as a Liaison Officer for Wrexham Council contributing to the local community and economy.

Our son was born in Wrexham and doesn't know any other life. He is in Year 8 and although he struggles academically (as did I - not everyone is cut out for academic work), he is getting all the support he needs from the Nurture team at Ysgol Y Grango. My son has a wonderful group of friends, and my partner has a job she loves, and we don't want to have to leave. She has worked hard in the house painting and decorating and homemaking while I have worked out on the moor. We love our life and the prospect of losing it all is almost unbearable.

All my life has been spent in the countryside, working come rain or shine, 365 days a year, all hours, day and night. I have devoted my life to the moor. I know all too well that many ground-nesting birds are facing extinction. Natural Resources Wales (NRW) regards my moor as a 'flagship moor' for Wales due to the wide array of wildlife here. I was recently told by an NRW employee that I am the last line of defence against curlews becoming extinct in Wales, which is quite a responsibility. I find it quite the paradox that the Welsh Government, by the action of banning the use of HCRs, is destroying its own policy for nature. I have witnessed all the moors around me fall silent of bird song when fox control is no longer carried out, and I now fear that this estate will be next.

Sheep & Lapwing
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Woodcock
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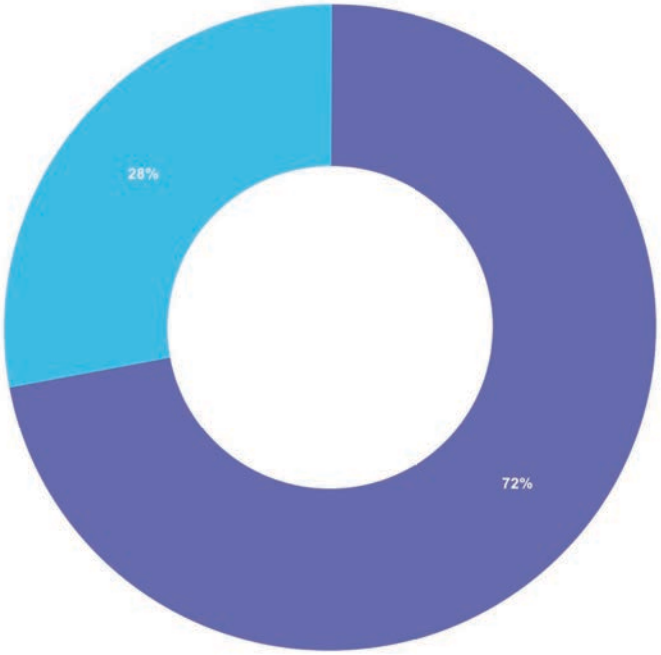
Question 17.

In order to safeguard the future of these devices, so that we retain a form of snaring in our toolbox, do you believe that now is the time for a ban on the sale and use of non-code compliant snares (snare-traps)?

72% or respondents agree that now is the time to ban the sale and use of non-compliant snares (snare-traps). If we take away the choice, then we can only work to the very best standards.

Yes **72%**

No **28%**



72% OF RESPONDENTS BELIEVE THAT IT IS TIME FOR A BAN OF THE SALE AND USE OF NON-CODE COMPLIANT SNARES (SNARE-TRAPS).

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CONCLUSION

Once again, we quote Natural England's Principal Adviser for Biodiversity Policy, James Markwick, who wrote on his blog regarding 30 x 30:

"The target of 2030 is not that far away, and we will need to work at pace and in as agile a way as possible. But in doing this, we must ensure that the key tenets of 30 x 30 are not diluted. We need to ensure that this is not just a counting exercise and that we have a plan in place to ensure that there is a legacy after 2030 as the world looks to a 50 x 50 target. There will be the need for robust assessment criteria for protected areas ...that provide confidence that they deliver long term for nature's recovery and deliver functional ecosystems. The next few years will be key."

To achieve these very worthy goals which the NGO and its members uphold, the Government needs the commitment, support and funding of the private landowners who facilitate shooting sports on their land and employ gamekeepers and conservation managers to maintain the habitat.

It is this land where successful habitat and wildlife results are bucking the trend of failure seen on other land owned by conservation organisations funded through the public purse: – the RSPB's very expensive Lake Vyrnwy project is an excellent example of spending money in order to fail.

It therefore defies logical thinking that on the one hand the Government have committed the taxpayer to meeting the aims of 30 x 30 in 63 months' time (at time of writing in September 2024) and yet on the other hand is threatening the removal of a central tool, the HCR, used in reversing species decline: **a tool which Defra themselves have agreed conforms to the technical specifications of their own Code of Best Practice and which passes the AIHTS standards for a fox restraining device.**

We are all in agreement that more work must be done to improve habitat for, and numbers of, red- and amber-listed species.

Our members have been doing this for years with great success.

However, this **will not happen** if fox numbers are allowed to increase to unmanageable levels (as we are experiencing in Wales since the ban on HCRs) leaving livestock and vulnerable species open to increased predation pressures by foxes.

Many species will almost certainly experience a rapid decline.

To quote one of the gamekeepers above: "*...without HCRs, I am of the firm opinion that fox predation on some of our rarest species would become unmanageable and would result in local extinctions*".

This is a very sobering thought, and one that we ignore at our peril.

The reality is that the shooting sector and farming (for food security) pay for conservation efforts on private land. If HCRs are removed, it will become financially impossible for private landowners and farmers to manage the increase in fox numbers by shooting with rifles alone.

It is possible that these operations may become financially unviable and therefore the landowners and farmers will withdraw funding for employing the land managers, gamekeepers and conservationists who are currently achieving the results the 30 x 30 commitment requires.

It is also likely that many grouse moors will become unviable. Approximately 40% of grouse moors are on SPAs (designated to protect rare, vulnerable and migratory birds) and in England 74% of upland SPAs are managed as grouse moors. If we can't use HCRs and we consequentially lose red grouse (in addition to other ground-nesters) the removal of keepers from these SPAs will directly cause the destruction of many of the remaining strongholds of our struggling waders.

In a country where the public purse is effectively empty, is it realistic (or indeed possible) to consider placing further and considerable financial burden on the taxpayer by asking them to fund a conservation effort once privately-funded by the landowners themselves?

The knock-on effects of the removal of the HCRs could include loss of jobs, closure of once-viable businesses and a decline in rural communities and rural heritage and will be widespread.

The value of shooting is worth £3.3 billion to the UK economy every year; it also provides a further £9.3 billion in economic activity value across the wider supply chains.

Successful outcomes from conservation efforts come at a price. Who will pay?

The modern HCR has been developed and rigorously tested to include and maintain the highest of welfare standards exceeding those required by the Agreement on International Humane Trapping Standards between the European Community, Canada and the Russian Federation. This agreement sets out clearly defined minimum trap humaneness standards and trap testing procedures, creating an internationally-recognised benchmark for trap welfare.

Unfortunately, the non-code compliant snare (snare-trap) is cheaper, and this is a key driver for the manufacturers, retailers and some end-users to continue with them.

Greater understanding of the design, employment and welfare standards of HCRs is urgently needed to correct the misguided beliefs of the ill-informed few.

Despite most NGO members choosing to use HCRs, without a change in the law the manufacture and sale of non-code compliant snares (snare-traps) will continue and is outside our control.

THE SOLUTION

To enable the continued use of the modern HCR as an essential conservation tool the NGO strongly recommends that:

- Non-code compliant snares (snare-traps) should be banned from manufacture, import and sale in England.
- The use of non-code compliant snares (snare-traps) should be banned.
- The HCR to remain a recognised tool in fox control and to be purchased and used by trained operators only, similar to the purchase and use of agricultural chemicals.
- Self-regulation through certification via attendance at the GWCT HCR trainingcourses and full compliance with the Defra endorsed CoP will negate the need for alicensing system.

Above all, we need to reverse the decline in nature and work towards the aims and goals of 30 x 30 commitment by protecting and increasing the wildlife we have. Any changes in our management practices should be results-based and founded on fact and sound science, not on misguided, ill-informed public opinion and false sentiment.

We have very limited time to reverse the decline in nature.

Reducing our ability to control predators such as the fox will have far reaching and costly consequences, not just financial, but by putting at risk the future of all ground-nesting and vulnerable species and negating the many successes we have had so far.

Why would we destroy nature for generations of mankind to come when we had the opportunity to improve it?

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