



Link Response: Consultation to protect wild birds

May 2026

This response is on behalf of nature and animal welfare coalition Wildlife and Countryside Link ([Link](#)) in support of proposed amendments to the Wildlife and Countryside Act 1981 which currently allows certain species of wild birds to be killed or taken outside of their close seasons.

Introduction

Wildlife and Countryside Link (Link) welcomes the opportunity to comment on proposals to revise Schedule 2.1 of the Wildlife and Countryside Act 1981. This is a necessary step to better protect British and global populations of wild birds which are already under threat from habitat loss, climate change and disease. While the proposed changes may affect those who participate in shooting, they will reflect wider public concern about protecting birds and conserving species.

We broadly support the proposals in this consultation and favour the removal of the identified species from Schedule 2.1, but we do not support the addition of the woodpigeon. We also strongly oppose the addition of further species to the Schedule, and do not believe that self-regulation by the industry will protect wild bird populations.

There are a number of areas where we believe the Government should go further than what is being proposed in this consultation.

We disagree that there should be different rules across England, Wales and Scotland for certain species, and instead support consistent policy across the three nations. The removal of species from the Schedule should apply across Britain as a whole. All species which are Red-listed as a Bird of Conservation Concern in the UK should be automatically removed from the schedule and amber listed birds should be removed under the precautionary principle. Some Link members would prefer for the practice of shooting any wild animal to be banned in its entirety due to the welfare considerations applicable to all birds in this consultation and beyond.

To better protect wild birds there are a number of important additional changes beyond the scope of this consultation that Government should consider.



The consultation recognises that alternative legislation such as The Game Act 1831 covers certain species including the native grey partridge and the black grouse in England and Wales, both of which are now Red-listed as Birds of Conservation Concern in the UK. A full review of the Game Act 1831 is long overdue for protecting wild bird populations from unsustainable shooting. Additionally, Schedule 9 of the Wildlife and Countryside Act permits the unlimited and unsustainable release of millions of non-native red-legged partridges and common pheasants into the countryside for shooting (except in close proximity to European protected sites) which we know to be harmful in terms of animal welfare, environmental pollution and biosecurity. We support the review of this practice as stated in the Land Use Framework.

Government should also consider reviewing the General Licence system for the lethal control of certain wild birds. In England there are very few if any records of the species and number of birds shot under GL42 and there is little focus on the requirement for licence users to prioritise other non-lethal measures. Conditions should apply to the general licences to limit the number of birds allowed to be shot, and to require robust record keeping and reporting to Natural England.

The consultation rightly recognises the potential scale of woodpigeon shooting carried out for recreation rather than for crop protection purposes. However, we do not believe that adding the species to Schedule 2.1 will drive behaviour change towards a reduction in the shooting of woodpigeons. Maintaining the general licence conditions while also imposing a close season is essentially accepting what would otherwise be deemed to be a wildlife crime. Instead, to combat non-compliance with licences and wider wildlife crime, there should be improved monitoring, data collection, and greater enforcement mechanisms.

In addition to the impact of recreational shooting on population numbers, the activity also results in unacceptable animal welfare harms. We believe that the removal of birds from Schedule 2.1 and/or the extension of close seasons will result in fewer birds suffering from non-fatal wounds. While shooting leading to immediate death is relatively humane, shot guns release a spray of pellets meaning birds close to the targets can be wounded, and target birds can receive non-fatal injuries. Data is limited because of a lack of appropriate monitoring of recreational shooting, although studies indicate high rates of non-fatal wounding¹. For example, a recent study of crippling rates in waterfowl by gunshot in Northwestern Europe found that 17% of wildfowl examined had embedded shotgun pellets. The proportion of birds

¹ Noer, H., Madsen, J. and Hartmann, P. (2007), Reducing wounding of game by shotgun hunting: effects of a Danish action plan on pink-footed geese. *Journal of Applied Ecology*, 44: 653-662.
<https://doi.org/10.1111/j.1365-2664.2007.01293.x>



with embedded pellets rose from 4% of first year birds to an average of 19% in adult birds, suggesting cumulative exposure. One individual in the study had 28 embedded pellets in its body². Non-fatal shooting of wildfowl results in lower survival rates³. An Australian study of live ducks found that between 6% and 19% were carrying embedded shot⁴. In addition to the non-fatal wounding rates found through studies of embedded pellets, other birds are wounded without shot remaining in their bodies, or do not recover from their injuries¹. Non-fatal injuries can be severe, causing pain and prolonged suffering in affected birds.⁵

The changes proposed in this consultation will reduce pressure on wild bird populations from shooting, but this is just one piece of the puzzle. Land management changes that have reduced the habitat available are the primary historical cause of bird population decline.⁶ Without suitable habitat for breeding, feeding and mating, species will continue to decline. For example, the curlew was removed from the quarry list in 1981 when the Wildlife and Countryside Act was debated. Despite this, the population still remains on the Red List due to habitat constraints. Disease, climate change, invasive non-native species and declines in local insect abundance are also important factors affecting breeding populations.

A): Removal of European White-Fronted Goose from Schedule 2.1 in England and Wales

Q 4A1: Do you agree the European white-fronted goose should be removed from Schedule 2.1 in England and/or Wales?

- Yes
- Both nations

Two types of white-fronted goose winter in Great Britain and Ireland which are both subspecies of the greater white-fronted goose. This consultation refers to the European/Russian white-fronted goose (*Anser albifrons albifrons*) which breeds in western Russia and winters mainly in southern England, while the Greenland white-fronted goose

² Buij, R., Moonen, S., Müskens, G. et al. Crippling rates of waterfowl by gunshot in Northwestern Europe: interspecific and geographic differences give clues to possible management challenges and options. *Eur J Wildl Res* 72, 35 (2026). <https://doi.org/10.1007/s10344-026-02070-2>

³ Madsen, Jesper, and Henning Noer. "Decreased survival of pink-footed geese *Anser brachyrhynchus* carrying shotgun pellets." *Wildlife Biology* 2, no. 2 (1996): 75-82.

⁴ Norman FI (1976) The incidence of lead shotgun pellets in waterfowl (Anatidae and Rallidae) examined in south-eastern Australia between 1957 and 1973. *Australian Wildlife Research* 3:61- 71.

⁵ Clausen, K.; Holm, T.; Haugaard, L.; Madsen, J. Crippling ratio: a novel approach to assess hunting-induced wounding of wild animals. *Ecol. Indic.* 2017, 80, 242-246.

⁶ <https://hub.jncc.gov.uk/our-work/official-statistic-on-population-trends-for-breeding-birds-in-the-uk/#drivers-of-change>



(*Anser albifrons flavirostris*) breeds in western Greenland and winters in the north and west of Britain and Ireland.

Wetland Bird Survey data indicates that 1,000–2,000 European white-fronts spend the winter months here in the UK - a decline of 75% between 1996/97 and 2021/2022.⁷ The European white-fronted goose is Red-listed as a UK bird of conservation concern.

The Greenland white-fronted goose is of the highest conservation concern among the UK's geese. The total world population of Greenland white-fronted Geese in spring 2024 comprised just 15,043 individuals, the lowest count since coordinated records began in 1982. This is a decrease of 16.6% from the 18,027 individuals counted in spring 2023.⁸

The main drivers of population change in Britain are likely to be short-stopping and climate change impacting the reproductive success of the Greenland white-fronted goose. We recognise that numbers are increasing proportionally elsewhere in the flyway and overall global numbers are stable. However, in a changing climate it is crucial that the additional pressure of human-induced mortality is stopped. Removing white-fronted geese from Schedule 2.1 would also protect the Greenland white-fronted goose. Despite the Greenland white-fronted goose being slightly larger and on average a darker brown, it is almost impossible to tell the two species apart when birds are in flight and the light is poor.

The proposed change will bring England and Wales in line with Scotland where the greater white-fronted goose has already been removed from Schedule 2.1.

Q 4A2: Can you provide more recent evidence on the number of European white fronted goose that are shot in England and/or Wales?

No. This will be the same for all questions in this consultation relating to evidence of numbers of each species being shot. There is a lack of transparency in the shooting industry over which birds are shot and in what numbers. This is due to an absence of a legal requirement of the shooters to report these numbers, and also in part because wildlife crime is all too common.

⁷ [waterbirds in the uk webs gsmp 202223.pdf](#)

⁸ Fox, A.D., Francis, I.S., Walsh, A.J., Norriss, D.W. and Kelly, S., 2024. Report of the 2023/2024 international census of Greenland White-fronted Geese. Available at: [GWFG-Census-Report-2023-2024-revised.pdf](#)



B): Removal of Goldeneye from Schedule 2.1 in England and Wales

Q 4B1: Do you agree the goldeneye should be removed from Schedule 2.1 in England and/or Wales?

- Yes
- Both nations

The Goldeneye population in the UK is listed as Red under the Birds of Conservation Concern 5: the Red List for Birds (2021). Just 200 breeding pairs are recorded in the Scottish Highlands. Although a few thousand goldeneye winter in Britain after arriving from northern Europe, their numbers have been falling.

Bi) Extending the Close Season for Goldeneye in Scotland

Q 4B2: Do you agree the close season for the goldeneye should be extended in Scotland to 30 September?

- Yes

This proposal is vital to protect the declining wintering population, and particularly the vulnerable breeding population. However, this proposal does not go far enough to secure protection for the remaining breeding pairs in the Scottish Highlands. This species should be removed from schedule 2.1 in Scotland as well as England and Wales.

Q 4B3: Can you provide more recent evidence on the number of goldeneye that are shot in England, Scotland and/or Wales?

- No

C): Extending the Close Season for Pintail in Scotland and Wales

Q 4C1: Do you agree the close season for the pintail should be extended in Scotland to 30 September for below and above the high-water mark?

- Yes

This is a positive move to protect the population of pintail in Scotland and Wales, but this proposal does not go far enough. We believe that the species should be removed from Schedule 2.1 in Scotland and Wales as well as in England.



Q 4C2: Do you agree the close season for the pintail should be extended in Wales to 30 November?

- Yes

See above. We believe that the species should be removed from Schedule 2.1 in Scotland and Wales as well as in England.

Ci): Removal of Pintail from Schedule 2.1 in England

Q 4C3: Do you agree the pintail should be removed from Schedule 2.1 in England?

- Yes

We support this precautionary measure to protect the small breeding population of pintail in England. This will only truly be successful if the same rules are applied in Wales and Scotland.

Q 4C4: Can you provide more recent evidence on the number of pintail that are shot in England, Scotland and/or Wales?

- No

Q 4C5: Can you provide evidence on the proportion and destination (for example private domestic consumption, sold, given to third parties, etc..) of shot pintail birds?

- No

Q 4C6: Can you provide evidence on what is the market price of pintail both wholesale and retail?

- No

D: Removal of Pochard from Schedule 2.1 in England, Scotland and Wales

Q 4D1: Do you agree the pochard should be removed from Schedule 2.1 in England, Scotland and/or Wales?

- Yes
- All three nations

This species must be removed from Schedule 2.1 across all three countries, without exception. They are Red-listed in the UK Birds of Conservation Concern and are classified as vulnerable in the Species of European Conservation Concern and the IUCN Red List of (global) threatened species. The population of breeding birds is around 700 pairs in the UK, mostly located in England. During the winter months this can rise to 30,000 individuals which flock here from the continent. This may sound like a healthy population, but the Wetland Bird Survey shows a declining trend in numbers representing a 74% decrease from 1997 to 2022, providing an incredibly strong case for greater protections from shooting.



Q 4D2: Can you provide more recent evidence on the number of pochard that are shot in England, Scotland and/or Wales?

- No

Q 4D3: Can you provide evidence on the proportion and destination (for example private domestic consumption, sold, given to third parties, etc.) of shot pochard birds?

- No

Q 4D4: Can you provide evidence on what is the market price of pochard both wholesale and retail?

- No

E): Extending the Close Season for Common Snipe in England and Scotland

Q 4E1: Do you agree the close season for the common snipe should be extended in England and/or Scotland to 30 September, for reasons of both conservation and animal welfare?

- Yes
- In both nations

The common snipe is one of two species of snipe in Britain and is classed as amber in the UK Birds of Conservation Concern. The UK population of snipe has undergone moderate overall declines in the past twenty-five years as their preferred habitat of low-lying grassy wetland and marshy ground has reduced. Wet grassland declined by nearly 60% between 1960 and 2013, mostly due to an increase in agricultural intensity and land development.⁹

The proposal to extend the close season is positive for the species, although our preferred outcome would be the complete removal of snipe from Schedule 2.1 across all countries, on a precautionary basis. This would also protect the second snipe species - the Jack snipe which is an uncommon wading bird in Britain – from being mistakenly shot. The “Look-alike” issue for snipe is evidenced in literature. A 2022 study revealed that of the 7154 snipe deliberately killed across the UK and other European countries, 173 were wrongly identified as one of four other species.¹⁰

Ei) Removal of Common Snipe from Schedule 2.1 in Wales

Q 4E2: Do you agree the common snipe should be removed from Schedule 2.1 in Wales?

- Yes

Please provide any reasoning or evidence to support your response

⁹ Ridding, L.E., Redhead, J.W. and Pywell, R.F., 2015. Fate of semi-natural grassland in England between 1960 and 2013: A test of national conservation policy. *Global Ecology and Conservation*, 4, pp.516-525. <https://doi.org/10.1016/j.gecco.2015.10.004>

¹⁰ Funghi, C and Spina, F (2022) ‘Intentional killing of birds by man’. ISPRA, Bologna, Italy. Available at: https://migrationatlas.org/sites/default/files/2022-03/Killing-birds-by-man-full-report-CFunghi-FSpina_0.pdf



Q 4E3: Can you provide more recent evidence on the number of common snipe that are shot in England, Scotland and/or Wales?

- No

4E4: Can you provide evidence on the proportion and destination (for example, private domestic consumption, sold, given to third parties, etc..) of shot common snipe birds?

- No

Q 4E5: Can you provide evidence on what is the market price of common snipe both wholesale and retail?

- No

F) Extending the Close Season for Woodcock in England, Scotland and Wales

Q 4F1: Do you agree the close season for the woodcock should be extended in England and/or Wales to 30 November in order to protect our native breeding population?

- Yes
- Both nations

This proposed change represents the very bare minimum needed to protect a declining and fragmented breeding population, although the preference would be full removal of the species from Schedule 2.1 for all three countries.

Most of the woodcocks in the UK are resident birds, but there are winter visitors from Finland and Russia. Resident breeding woodcock are Red-listed as 'Vulnerable' and are considered at risk of extinction.

A 2023 survey provided critical data on woodcock population trends, revealing an 8% decline since 2013 and 35% since 2003, with the British breeding population estimated to be around 50,000 male individuals.¹¹ The population changes varied spatially but overall showed a continued substantial decline despite some modest short term regional increases in England and Wales. The survey identified severe population loss in breeding woodcocks in northern Scotland - which has seen a 49.5% decline over the 10 years. Scotland has historically supported the core of the breeding woodcock population, so this level of decline is likely to impact the total UK population.

This abrupt change is likely primarily due to habitat change and loss of suitable breeding area. However, a recent study from Colonsay Island in Scotland indicated that where the available habitat has not changed, the level of shooting is having a negative impact on the woodcock population.¹²

¹¹ Heward, C.J., Conway, G.J., Hoodless, A.N., Norfolk, D. & Aebischer, N.J. 2024. Population and distribution change of Eurasian Woodcocks *Scolopax rusticola* breeding in the UK: results from the 2023 'Breeding Woodcock Survey'. *Bird Study* 71: 109–123. <https://doi.org/10.1080/00063657.2024.2345272>

¹² Jardine, D.C. 2025. Decline of a breeding population of Woodcock following the re-introduction of shooting in winter on a small island in Argyll. *Scottish Birds* 45(4): 301-306.



Q 4F2: Do you agree the close season for woodcock should be extended in Scotland to 14 November in order to protect its native breeding population?

- Yes

The woodcock should be removed from Schedule 2.1 in all three nations. Failing that, the revised shooting season should be unified across all three countries. Considering the significant declines in the northern Scotland breeding population it does not make sense to apply a less cohesive close season policy there.

Q 4F3: Can you provide more recent evidence on the number of woodcock that are shot in England, Scotland and/or Wales?

- No

Q 4F4: Can you provide evidence on the proportion and destination (for example, private domestic consumption, sold, given to third parties, etc..) of shot woodcock birds?

- No

Q 4F5: Can you provide evidence on what is the market price of woodcock both wholesale and retail?

- No

G) Adding Woodpigeon to Schedule 2.1 in England, Scotland and Wales

Q 4G1: Do you agree to adding woodpigeon to Schedule 2.1 in England, Scotland and/or Wales?

- No
- In all three countries

We do not believe that the woodpigeon should be added to the quarry list with an open season from 1 September to 31 January whilst remaining on general licences for all year-round control.

The consultation rightly recognises the potential scale of woodpigeon shooting carried out for recreation rather than for crop protection purposes. However, we do not believe that adding the species to Schedule 2.1 will drive behaviour change towards a reduction in the shooting of woodpigeons. Keeping the general licence conditions the same while also imposing a close-season is essentially accepting what would otherwise be deemed to be a wildlife crime. Instead, to combat non-compliance with licences and overall wildlife crime, there should be improved monitoring, data collection, and greater enforcement mechanisms.



4G2: Can you provide more recent evidence on the number of woodpigeon that are shot in England, Scotland and/or Wales?

- No

Q 4G3: Can you provide evidence on the proportion and destination (for example, private domestic consumption, sold, given to third parties, etc..) of shot woodpigeon birds?

- No

4G4: Can you provide evidence on what is the market price of woodpigeon both wholesale and retail?

- No

Wales only

A) Removal of Coot from Schedule 2.1 in Wales

Q 5A1: Do you agree the coot should be removed from Schedule 2.1 in Wales?

- Yes

Q 5A2: Do you agree the Schedule 2.1. status of the coot should not be changed but maintained as it is in England and/or Scotland?

- No

5A3: Can you provide more recent evidence on the number of coot that are shot in England, Scotland or Wales?

- No

B) Removal of Golden Plover from Schedule 2.1 in Wales

Q 5B1: Do you agree the golden plover should be removed from Schedule 2.1 in Wales?

- Yes

Q 5B2: Do you agree the Schedule 2.1. status of the golden plover should not be changed but maintained as it is in England and/or Scotland?

- No

Q 5B3: Can you provide more recent evidence on the number of golden plover that are shot in England, Scotland or Wales?

- No



Current species on Schedule 2.1

Q 6.1 Do you think any other species should be removed from Schedule 2.1 in England, Wales or Scotland?

- Yes

As stated previously, there should be unity in policy across the three nations. If shooting continues to be permitted in just one or two nations, there is a risk of concentrating hunting pressure into a smaller area resulting in increased conservation challenges.

The following species should be removed from Schedule 2.1:

1. Goldeneye in Scotland
2. Pintail in Wales and Scotland
3. Snipe in England and Scotland
4. Woodcock in all three countries
5. Coot in England and Scotland
6. Golden Plover in England and Scotland

In addition to the above, we recommend the following changes be made:

7. Remove Capercaillie in England and Wales
8. Remove Ptarmigan from Scotland
9. Remove Black Grouse from Scotland
10. Remove Grey Partridge from Scotland

Removing capercaillie from England and Wales will make no impact to the species as it is extinct in those nations, but this is an opportunity to tidy up the legislation.

There is already a voluntary moratorium in Scotland on shooting Ptarmigan, Black Grouse and Grey Partridge due to the vulnerability of populations. Removing these species from the Schedule would therefore make no practical difference to those who have already voluntarily stopped shooting them, while providing stronger protection would prevent killing by those who refuse to adhere to the voluntary approach.

Ptarmigan strongly favours cold habitats, and are particularly vulnerable to climate change. The small population is restricted to the Scottish Highlands but has suffered an 81% decline in population since 1961. Even small numbers of shootings could now cause significant harm to the population. The case for statutory protection is therefore especially strong.



Both black grouse and grey partridge are now Red-listed as Birds of Conservation Concern in the UK but remain huntable in England and Wales under the Game Act 1831. A full review of the Game Act 1831 is long overdue in order to protect wild bird populations from unsustainable shooting.

~~Q 6.2 Should other amendments (for example an extension or shortening of a close season be made with regard to any other species listed on Schedule 2.1 in England, Scotland or Wales? Please give evidence or reasoning to support your answer~~

~~Q 6.3 Should any other species be added to Schedule 2.1 in England, Scotland or Wales? Please give evidence or reasoning to support your answer.~~

Wildlife and Countryside Link (Link) is the largest nature coalition in England, bringing together 94 organisations to campaign for nature, climate, animal welfare and a healthy environment for everyone. Wildlife and Countryside Link is a registered charity number 1107460 and a company limited by guarantee registered in England and Wales number 3889519.

For questions or further information please contact:

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The following organisations and inputted into and support this briefing.

RSPCA

Born Free

IFAW

League Against Cruel Sports

Rewilding Britain

Humane World for Animals UK