Written submission from the Scottish Gamekeepers Association

The Scottish Gamekeepers Association welcomes the opportunity to engage with the RACCE Committee on the Land Reform (Scotland) Bill.

Our response below focuses on two specific areas, parts 6 and 8.

**6/ To reintroduce non-domestic rates on shootings and deer forests.**

The SGA has specific points regarding these proposals.

1/ There is a perception within the eyes of the public that reintroducing business rates for country sports brings shooting and deer stalking ‘into line with other similar businesses’. This has often been repeated by Scottish Ministers and, indeed similar language has been used in some of the background papers and briefings to the Bill which makes it understandable that the public may hold such a view. We would hope that, during the passage of the Bill, that Scottish Ministers make the public aware that certain large rural industries (agriculture, forestry, aquaculture) are currently exempt- and will remain exempt- from business rates and, indeed, may be able to explain the reasons why, in comparative detail. The perception that some professions have been ‘getting away with it’ tends to colour the debate somewhat and is unhelpful as we move towards what is best.

2/ How land holdings are to be rated for ‘sporting’ value will pose challenges and will be a considerable undertaking for assessors, both in time and public resource. It is a matter for Scottish Ministers to decide whether this undertaking will be financially beneficial, set against the rates revenue raised. The SGA maintains its position that it opposes the removal of business rate exemptions for shootings and deer forests, particularly as the economic impacts of such a measure have not been assessed in any depth. Ministers have conceded that there are likely to be some jobs lost as a result of the Bill; something we would rather not see at all, particularly when many of the skills deployed by our members on estates bring wider environmental and community benefits. However, we are encouraged that Scottish Ministers have recognised the need to consider reliefs, perhaps through the Small Business Bonus Scheme, where the margins for what would be labeled within a business as ‘sporting’, is below a certain threshold. We feel this could help preserve a small number of full and part-time jobs while the public benefits of the land management which assists wider conservation, is retained.

3/ The SGA feels there are many complications when it comes to separating ‘sporting’ culls from a management cull in respect of deer. For example, there is a well understood public and environmental benefit from estates carrying out a sporting cull as part of a wider management cull. Deer are culled for many reasons. Indeed, the sporting element pays for the wider public service in terms of the professional stalkers’ time and expertise. The stalker, who must be qualified to at least DSC1 level, also takes upon the public duty to neighbours, etc, to achieve annual agreed cull targets. For this reason, we are opposed to the removal of business rate exemptions for deer stalking when there is clear public benefit derived, not to mention the community positives reaped from an influx of visitors from other parts of Scotland, England and overseas to stalk. We note that our concerns in this regard were echoed by one of the advisers to the Land Reform Review Group, Malcolm Combe, who also lectures in the school of law at Aberdeen University. Writing in The Herald, Mr Combe said, in reference to the proposals put forward in the Land Reform (Scot-
land) Bill, “There are also proposals to increase regulation of deer management and to abolish the domestic rates-relief that sporting estates have enjoyed since 1994, both of which could have an impact on existing rural businesses and, in time, ecosystems.” We feel his words succinctly encapsulate our thoughts both for jobs and the environment and, in trying to pursue greater community benefit, the reform must guard against starving existing communities that it aims to make more robust and prosperous, of employment and tourism which is relevant to them. Indeed, we note with interest that some community-owned landholdings are now realising that sporting income from deer can finance both deer management and give some much-needed funds. These community-owned holdings will also similarly have to be assessed for business rates which may negate that source of income.

If it is the case that business rates are to be removed completely for deer stalking, we feel there would have to be a clear distinction drawn between sporting and management culls and that which takes place for management only should be exempt from rates.

4/ The SGA would like to see a comprehensive economic assessment carried out in respect of the impacts that removing business rate exemptions could have on both stalking and land ghillie/ponyman jobs. Employment can be difficult to come by in remote parts of rural Scotland where stalking often takes place and the SGA’s consistent concern has been for its members whose household family income is dependent on this activity. A comprehensive report authored by SGA Vice Chairman Peter Fraser in 2013 was privileged, during the process, to gain access to the accounts of estates in Sutherland which showed, averagely, that these businesses were subsidising employment of stalkers through other estate activities. The study also assessed the value to community businesses of incoming sporting visitors. Our fear is that the removal of business rates exemptions could further dis-incentivise employment retention, may see less profitable stalking operations scaling back and, with this, the investment in deer management, with its associated public benefits derived, lessening. For these reasons, we hope economic assessments are undertaken, at similar depth, as the Bill progresses, and will be happy to provide any information we can to inform such a study.

5/ Would sport stalking within the National Forest Estate also be liable for ratings? The SGA believes there are opportunities to make better use of Scotland’s deer resource, with one way being to encourage more entrants into deer management by opening up more stalking ground on NFE land for qualified deer managers from local areas. This is particularly relevant in lowland and peri-urban Scotland where roe deer are the dominant species and qualified stalkers can often be deployed at significantly less cost to the public purse. Unfortunately, large tracts of the NFE are closed to local stalkers, with Forestry Commission Scotland now employing less full-time ranger/wildlife managers and, instead, paying contract stalkers on a ‘per-animal’ kill fee. Because it is an SGA aspiration to see the benefits of deer management and opportunities for local stalkers to be increased on public land, we see sporting rates as a barrier.

Part 8- Deer Management.

We are pleased to see that consideration has been given to defer any further recommendations on deer management until the review has been carried out in 2016, as was the wishes of the then Environment Minister, Paul Wheelhouse.
If interim powers are granted to SNH to intervene (post 2016 review) to help ensure appropriate deer management, as suggested by the proposal in Part 8, we would hope that the conditions under which interventions or fines are justified are clearly and transparently laid out beforehand and are the subject of consultation with stakeholders. As this may be introduced under land reform, which has amongst its objectives economic prosperity and sustainable economic development, we would hope that sufficient weighting is given to socio-economics in situations where agreements might not be reached and SNH uses its powers to intervene. We would also hope that deer management practice which goes against the socio-economic interests of communities will be similarly liable for penalty. We note, for example, the comments made by the representative for Storas Uibhist who said that the community carries out deer management in a way that works with their requirements as a business and maximises the revenue available to the business from the herd, which is sensible. The representative went on to say that, if the actions of SNH were to impact the revenue raising potential from the management of the deer herd this could have an effect on their business. As stated, in point 3 (above), this will also have an impact on the wider environment. We feel it is wholly necessary, therefore, for socio-economic concerns to be given as much consideration as any other when decisions are to be made regarding possible interventions.