Written submission from the Association of Deer Management Groups

The letter below from Richard Cooke, Chairman, Association of Deer Management Groups to ADMG members, and others with an interest in the deer sector in Scotland, is in response to the SNH Report on Deer Management published last week.

21 November 2016

SNH Report on Deer Management in Scotland

Having now had time to read and digest this critically important Report, released last week, I find it, as a whole, deeply disappointing and strongly disagree with its main conclusion that: "We (SNH) are not confident that present approaches to deer management will be effective in sustaining and improving the natural heritage in a reasonable timescale."

We also disagree with the statement that SNH “cannot confidently conclude that a step change has been taken” and assert that the step change required of us in 2014 has most definitely been taken. The SNH Report itself acknowledges “signs of improvement” and lists evidence of that in terms of the marked progress in DMG Assessments, as their diagrams illustrate, new Deer Management Plans in almost all cases, extensive public engagement and consultation, and improving environmental indicators, as well as progress in the lowlands. Indeed, the Report goes out of its way to commend the progress made which seems perversely at odds with the premature conclusion that we are doomed to fall short. Inexplicably the Main Findings and Conclusion and the discussion sections in the Report seem to contradict each other.

The Report also suggests the need for “additional measures”. What other measures can possibly be needed when SNH already has statutory powers of intervention dating back to the 1996 Deer (Scotland) Act, further supplemented this year in the Land Reform (Scotland) Act, which it has yet to use? There have in fact been instances, albeit a small number, when ADMG would have supported the use of those powers to resolve some really difficult situations but SNH has chosen not to do so.

To any objective reader the Report describes an improving situation and to say otherwise is most discouraging to those who have made a great effort to embrace a totally new approach to deer management in less than 2 years – nothing less than a change in culture. In the new Deer Management Plans we have laid the foundations for an ongoing process of refinement and improvement in the way we manage our deer and we accept that we are accountable for demonstrating that we do so in the public interest as well as to meet our own collective management objectives. The Groups which I have sat in on in recent weeks are already engaged in implementing their Action Plans and monitoring their own progress, and in particular addressing the first priority which is to set up a comprehensive habitat impact assessment framework across all properties.

Despite our strong criticism of the conclusions drawn we should acknowledge that the Report contains much useful new evidence and analysis. We would also
emphasise that we expect to continue to work closely with SNH, as we have in the past. Meeting the Scottish Government targets, environmental, economic and social, is a job for all of us, not just the deer sector, and success or failure will depend on our ability to work effectively together in pursuing common goals. We will hope to meet with SNH shortly to go over the Report in detail.

We have set up a Project Fund to enable us to take forward a range of necessary development work including the revival and updating of Wild Deer Best Practice and to roll out the data processing model, SWARD, both necessary tools for future progress and now casualties of cuts to SNH budgets. Thank you to those who have made generous donations to a steadily rising total, and further contributions will be most welcome.

ADMG has been invited to give evidence to the Environment, Climate Change and Land Reform Committee of the Scottish Parliament on 13 December and will do so. You may be sure that I intend to project a picture of a dynamic and progressive, self-determining sector – as evidenced by the progress made over the last two years and commended in the body of this Report – and we will continue to move forward, hopefully with the support and encouragement of SNH.

Richard Cooke
Chairman, ADMG