Written submission from the Scottish Environment Link

Introduction

Scottish Environment LINK is the forum for Scotland's voluntary environment community, with over 35 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society.

SNH Review of Deer Management: Evidence to ECCLR Committee

1. We welcome the interest of the ECCLR Committee and its predecessor RACCE Committee in applying scrutiny to the issue of wild deer management, and in particular in prompting the production of the recently published Review of Deer Management in Scotland (SNH 2016).

2. The SNH Review correctly acknowledges encouraging and very welcome efforts made in some parts of the country to improve Deer Management Planning. In answer to the Minister’s question as to “whether or not the present voluntary system has produced a ‘step change in the delivery of effective deer management’” SNH provides evidence to justify its conclusion that – notwithstanding these improvements – it is “not yet confident that present approaches to deer management will be effective in sustaining and improving the natural heritage in a reasonable timescale.”

3. The Review highlights that “available information suggests that if deer densities were lower across Scotland the benefits could be maintained and costs reduced leading to overall enhanced delivery of public benefits.” We firmly subscribe to this view.

4. Importantly, the SNH Review also helps to illustrate the inadequacies of the current regulatory system, for example:

- Only three out of 11 voluntary Control Agreements have met habitat targets;
- SNH has been unable to use its powers to follow up with compulsory Control Schemes – shown over nearly 60 years to be unworkable;
- SNH’s powers are limited to preventing damage, not restoring degraded habitats;
- The overwhelming emphasis of effort is on red deer and designated sites for biodiversity;
- Widespread impacts of all four deer species in the rest of the country are largely neglected.

---

1 see Minister’s Response to RACCE Committee
http://www.scottish.parliament.uk/S4_RuralAffairsClimateChangeandEnvironmentCommittee/General%20Documents/2014.03.05_-_Ministers_response_on_Deer_Management.pdf

2 under S7 of the Deer (Scotland) Act 1996

3 Under S8 of Deer (Scotland) Act 1996
5. The result is continuing damage to the public interest, frustrating the delivery of Scottish Government targets in Biodiversity, Climate Change and Woodland Expansion, as well as imposing a heavy burden of public costs (e.g. in woodland fencing and deer-vehicle collisions on the roads), and major longer term opportunity costs related to forestry, carbon, flooding and river fisheries.

6. Without more effective powers and strong support from Ministers to ensure that the public interest is protected, SNH is not in a credible position to deliver Scottish Government’s own public policy objectives. Continuing to rely on a failed framework also confuses signals to land owners regarding the Scottish Government’s commitment to these objectives.

7. Better regulation would bring Scotland in line with virtually every other European country, where deer managers deliver both the public and private interests.

8. It is important to note:

   - There is a long history to these issues, stretching back over many decades, which SNH has been unable to resolve;
   - Over most of Scotland, owners of land remain free to cull or not, without any obligations;
   - Reductions are only being resisted by the sporting estate (red deer) sector, despite evidence that a reduced population would be beneficial to all interests and improve deer welfare.
   - Progress to date is mainly in the form of improved Deer Management Plans – not outcomes on the ground;
   - Pressure from the Parliamentary Committee has been a major factor in driving progress; there is justifiable doubt as to whether the improving trend can be sustained if this pressure is eased;
   - All species of deer (red, roe, and introduced sika and fallow) are still extending their range;
   - 61% of the country is not covered by a DMG. Most of these areas have no access to data on culls or impacts, and deer numbers are rising mainly due to neglect from owners with little interest or capacity to manage them.

Where do we go from here?

9. Significant progress has been achieved in two areas; the detailed SNH Review has established the facts against which progress can be considered; and the Association of Deer Management Groups has also made progress in improving Deer Management Planning for red deer on the open hill.
10. We propose that the important next stage is to help further progress by addressing weaknesses in the regulatory regime across the country, as recommended in the Land Reform Review Group (LRRG) report (2014)\textsuperscript{4}.

11. The LRRG report proposed improvements “to encourage the voluntary approach to work more effectively and enable adequate culls to be carried out when it does not”. In summary:

- Require individual landowners to seek consent from SNH to confirm that their planned culls are environmentally and socially responsible, protecting public interests in their area;
- Provide SNH with effective powers to ensure delivery of these culls where the owner is unable or unwilling to do so.

12. We believe a modernised system along these lines would also need, as the essential basis for decision-making, to:

- Gather much improved quality and coverage of deer management data;
- Include all deer species, in all parts of the country;
- Make this information easily accessible on line to inform local discussions.

13. We believe these measures have the merit of being ‘light touch’ in terms of regulation, by retaining the voluntary principle, assisting the responsible efforts of deer managers and landowners, and enabling gradual change, with the prospect of net savings to the public purse.

**Conclusion**

14. The SNH Deer Management Review indicates (p97) that “longer term improvements may not be forthcoming without additional measures to enhance sustainable deer management in Scotland. Work on options to address current deficiencies will require further discussion and collaboration with the deer sector and a range of stakeholders.”

15. We would welcome the opportunity to participate in an independently chaired, multi-sector, short-life working group with clear terms of reference to develop the Land Reform Review Group proposals for the development of a modernised regulatory framework fit for the 21\textsuperscript{st} Century.

**This LINK Evidence is supported by the following member organizations:**

RSPB Scotland
Ramblers Scotland

Scottish Wildlife Trust

Trees for Life

Woodland Trust Scotland

John Muir Trust (not LINK affiliated)