DMIS16 011

Written submission from Knoydart Deer Management Group

This written submission comprises two emails. The first is from 30 November 2016 to the Clerks of the ECCLR Committee and the second is to the Committee ahead of its meeting on 13 December.

30 November - email to Clerks

I am writing to you as the Chair of Knoydart Deer Management Group in relation to the publication, Deer Management in Scotland: Report to the Scottish Government from Scottish Natural Heritage 2016, recently discussed by the Environment, Climate Change and Land Reform (ECCLR) committee of the Scottish Parliament.

I wish to point out two very obvious errors in relation to this group.

On p21, it says that the deer density in Knoydart and West Knoydart is 13.6 to 15.1 deer/ km sq. There was a very good SNH helicopter count carried out in November 2014 which gave the population as 9.6 per sq km across the two groups, and this is the best information available to us. We have no reason to believe that the population has changed since then. Indeed, it would be biologically impossible for it to have reached the densities given.

On p30, your table suggests that Knoydart DMG does not cull enough deer to cover recruitment. In the year quoted, our estimated recruitment was 18% after an extremely wet and cold spring, and therefore the cull delivered was more than adequate to contain numbers. I would like to assure you that members of this group manage their deer responsibly, and react according to the management information that is available to us.

There appear to be a significant number of errors in this report, and I would ask that you please pass on my comments to the committee so that they can be properly informed. Also, we would appreciate more care taken in relation to accuracy of SNH reports before publication.

Email to the Environment, Climate Change and Land Reform Committee

Here are some comments for the benefit of the Committee in relation to the review of current deer management in Scotland, and the role of SNH:

I write as Chairman of the Knoydart Deer Management Group. Our membership area is large, running from North Loch Lochy, in Lochaber, to the Knoydart peninsula and Loch Morar. Many of the member estates are remote, and can only be accessed by sea. The climate in the area is extreme, with the highest levels of rainfall in the UK. For much of the area the land is very marginal, and does not have the infrastructure to support farming, forestry or renewables. Tourism, whilst attracting fairly high numbers of hill walkers, is not of great economic significance. Therefore deer-stalking is the primary industry in the area, providing core employment and attracting inward investment.
Our deer management group has operated successfully for many years, and we have worked closely with SNH throughout. Lately we have experienced difficulties in relation to the implementation of SNH/Scottish Government guidelines. We have successfully developed a comprehensive deer management plan, and have implemented a number of measures in addition – in particular, we have initiated a programme of habitat monitoring at the suggestion of SNH, in order to comply with aspirations of delivering public interest.

In the development of a deer management plan, SNH had specific requirements. These were not complied with by certain land management areas outwith our group area. SNH spoke in terms of implementing a Section 7 in the event that certain requirements were not complied with, such as functional deer population monitoring and modelling. In the event, SNH did not deliver a Section 7 – on the grounds of cost. This, along with other issues relating to the role of out-of-season licences and local rural socioeconomic matters, has in some way discredited SNH’s role. There is little point in detailing a list of requirements but failing to enforce them in the event of a lack of compliance. Current legislation gives SNH the necessary tools to deal with these issues – but they’re not much use if they are not deployed. In effect this punishes compliance and rewards noncompliance: truly a dysfunctional message.

I’m reluctant to criticise SNH and its staff members because in my case they have been helpful throughout. The hesitation on the part of SNH to use the regulatory tools that they already have may be due in part to a perception of a lack of resources. This therefore begs the question, how on Earth would a state system of management replace a voluntary system, in practical terms? It would require a huge amount of compliance enforcement and all the resources required to back that. Our example shows that the voluntary system works well, provided SNH back their own policies with effective action.

Sir Patrick Grant

Chairman, Knoydart Deer Management Group