Written submission from the Forest Policy Group

Forest Policy Group evidence to ECCLR committee – re SNH Review on 13 December 2016

The focus of SNH review has been mainly on red deer, on their impact on the natural heritage, and particularly on designated sites which consume the majority of SNH attention, resources, and regulatory effort on deer management. Even here, as the Review shows, the system is failing, due to a number of factors including lack of cooperation and weak enforcement. We are not convinced that the Scottish Government has given adequate support to SNH for the use of its compulsory powers.

Meanwhile, the failure is more widespread; other aspects of the natural heritage, other parts of the country, other species of deer, and their impacts on other interests do not get the attention they deserve. All four deer species have far-reaching impacts on social and economic development, as well as the natural heritage, not only on the hill ground but also on all of the rest of Scotland.

The (un-researched) impacts on individuals and communities are onerous and costly – for people trying to grow trees or protect woodlands, householders whose carefully tended gardens are only safe if surrounded by six foot fences, people who travel in fear on country roads, and farmers who have to tolerate marauding deer from neglectful neighbours. This is on top of the public costs of fencing, traffic accidents etc identified in the SNH review. It’s important not to underestimate the breadth of concern that these issues remain so conspicuously unresolved.

Hunting should act in the service of good resource management. Deer need to be controlled, in the absence of natural predators, but there are ways of doing it which allow deer to exist in harmony with regenerating forest and for hunters to enjoy a rewarding experience. In the very similar geology and climate of SW Norway, as demonstrated by Dr Duncan Halley¹, red deer numbers are managed at much lower densities, as a result of which they are healthier and more productive, reaching heavier body weights and raising more young with less winter mortality. At the same time the quality of the habitat improves – a virtuous cycle of repair and renewal. And with the deer thriving, harvest levels are as high as in Scotland.

There is a strong lobby acting in defence of open hill stalking with its requirement of abundant shootable stags. One question is whether this preference for high densities – with all its consequent impacts on other interests - should continue to prevail over so much of our land, and continue to make such high demands on public and private tolerance, especially in an era of land reform. In their success, those who defend the status quo appear increasingly in denial of its wider implications.

We challenge the easy claim that a reduction in the red deer herd would bring the loss of jobs; it is the current pattern which has degraded the land and robbed it of productivity. Change would bring a change of jobs, for the better, gradually, as trees grew, soils improved, rivers regained the richness of their fish life, and restored landscapes increased their capacity to sustain the livelihoods of resident people and

¹ See 44:30 to 46:50 in http://www.nordichorizons.org/the-nurturing-nature-event-resources.html
their resilience in the face of new threats – climate change, tree diseases, economic stress. And on lower ground, improved deer management would also release exciting potential, currently suppressed, for the kinds of benefit revealed in a recent conference FPG organised on locally controlled woodlands\(^2\).

This was the first time that direct evidence had been brought together from such a wide range of local forestry case studies showcasing the economic, social and environmental benefits to be derived from locally controlled woodlands. Evidence points to special aspects of this contribution, including ‘sticky’ money, which recirculates in the local economy; development of entrepreneurial skills, meaningful employment, volunteering, and connectedness with community and place; ability to fill gaps and address market failures e.g. bringing ‘uneconomic’ woods into production; and an emphasis on quality of provision – whether social care, furniture or houses.

These are trends explicitly promoted in the Scottish Government’s Land Use Strategy, the Land Reform agenda, Climate Change programme and Forestry Strategy. However, small woodlands – especially of broadleaved trees, suffer disproportionately from high densities of wild deer in the surrounding landscape, and this imposes a heavy cost burden on local projects.

It must be doubted whether the aspiration of regarding land as a precious asset that ‘benefits the many, not the few’ can be fulfilled if Scotland remains at the bottom of the European class with the least regulated system of deer management.

We need to develop a deer management culture everywhere. *All* landowners have a responsibility to control deer – a responsibility which is ignored with impunity in much of the country. This is inequitable; neglectful owners are not asked to pay the £13m pa of public costs clearing up road traffic accidents caused by deer, nor are they required to stump up a share of the £5m pa spent on forest fencing.

And while the Forestry Commission dedicates a further £30m of public money pa to the expanding woodland cover by 10,000 hectares, justified largely on the basis of their contribution to sequestering atmospheric carbon, proper deer control would allow woodland to grow naturally, free of charge, on several times that area. This is just one of the ways that public grants indirectly subsidise the failure of land owners to manage deer in the public interest.

All these points show a need for the Scottish Government to pursue three priorities:

1. **Challenge the Deer Management Group sector** to demonstrate the required standard of deer management in the areas they cover, to the satisfaction of SNH, in time for the next statutory review of deer management in 2019.

2. **Commit to a ‘step change’ in the level of political support given to SNH** in its regulatory work, to demonstrate the Scottish Government’s commitment to this objective.

3 Modernise the regulatory system in the meantime to ensure that in the future adequate numbers of deer (all species) are culled every year to protect the public interest in each area of Scotland. We believe the crucial elements of reform are, broadly as proposed by the Land Reform Review Group report (2014) to improve the following aspects of the voluntary system:

Information: making data on deer culls easily available to inform local discussion and decisions

Scrutiny: requiring individual owners to demonstrate the adequacy of their planned culls;

Enforcement: Giving SNH credible back up powers to ensure delivery of the required culls if necessary.