Written submission from the National Trust for Scotland

Summary

Deer are an important part of our natural heritage, bringing a range of ecosystem benefits. We also recognise that deer need to be controlled to help secure environmental, social and economic benefits.

There has been a significant improvement in the development of deer management plans and the efforts of the group members and ADMG should be recognised. The focus should now be on intervention where the system is failing to work as well as supporting the implementation, assessment and enhancement of the approved plans.

The report does raise concerns, particularly in relation to protected areas and native woodlands. We would note that the Biodiversity Route Map to 2020, published in 2015, anticipates that it will be a medium term effort to update deer management plans to include the restoration of native woodland as a public interest target, and that plans for lowland deer management need to be developed.

In considering the way forward, we would ask the Committee to consider the following:

- The capacity of Scottish Natural Heritage to provide a robust evidence base for decisions at local level, given reductions in funding. This needs to include evidence of other grazing and browsing pressures on these habitats.
- SNH need to be clear about what habitat targets they seek to achieve outwith designated sites through changes to deer management and how they would incentivise or resource this.
- The likely replacement of the Common Agricultural Policy presents an opportunity to move to a land management subsidy regime that targets public benefits, including enhancing biodiversity and the extension and improvement of native woodlands.
- There is a need to manage grazers at a landscape scale, including across existing Deer Management Groups. The Land Use Strategy is relevant here in helping reconcile different ownerships and objectives.
- The need to enhance lowland deer management.
- The current close season for stags frustrates the aims of management for ecological reasons and urgently needs to be reformed.

Introduction

The National Trust for Scotland is committed to sustainable deer management and has recently revised its own deer policy governing the management of deer across all of its landholdings. This clearly identifies that the primary goal of deer management is to ensure the conservation of important features or species on its properties. In this process we consult with Scottish Natural Heritage about the
desired levels of grazing pressure to achieve different habitat outcomes and with our 
neighbouring landowners, participating actively in regional deer management 
groups.

**Developing the Evidence Base**

We would welcome robust evidence to help SNH best identify how to progress 
contentious habitat management issues.

Evidence of the extent to which various herbivores are damaging habitats is scant 
and the positive impacts of herbivores in maintaining short swards in some habitats 
needs to be acknowledged. Deer management plans need to take an inclusive 
habitat approach to grazers rather than focus on deer numbers alone and needs to 
be able to balance different required grazing levels, often in close proximity.

We recognise that robust data on deer populations is unavailable. We welcome the 
work that SNH and James Hutton Institute are undertaking to improve data on red 
deer populations but note that the report characterises roe deer numbers as 
“guestimates”. Roe deer are the primary species in the lowlands and, as the report 
notes, the Native Woodland Survey of Scotland found that a third of all native 
woodland is in an unsatisfactory condition and that around half of these woodlands 
are in the lowlands of Scotland. Our experience from Mar Lodge is that the impact of 
roe deer, even in the uplands, can be greater than expected.

There is also, as reported to the ECCLR by Claudia Rowse, no robust socio-
-economic data on the impact of deer to woodland and forestry¹.

**Voluntary Scheme for Deer Management**

As we have previously commented, following the Rural Affairs, Climate Change and 
Environment Committee review, there have been huge improvements in the quality 
of some DMPs produced, under the active coordination of the Association of Deer 
Management Groups. We very much welcome this and applaud the progress so far; 
the challenge will be to ensure that the implementation of these plans brings the 
anticipated benefits and is extended throughout the deer range in Scotland, including 
in lowland areas. We also welcome the increased investment by Scottish Natural 
Heritage in the deer management process in order to effect the required changes 
in deer management practice, and we will play a constructive role in trying to make this 
work in relation to our own properties.

We are of the opinion that the voluntary approach to deer management is preferable 
to statutory control. The report estimates that the cost of deer management borne by 
private landowners is about £36.8 million, producing a gross income of £15.9 million. 
The resulting net cost to landowners is £20.9 million and there is a danger that a 
proportion of this would fall to the public purse under a statutory system. It should be 
noted that these figures are derived mainly from the uplands and implementing an 
adequate system in the lowlands are likely to impose further costs.

Furthermore, the formulation of effective DMPs is costly and the report indicates that SNH believes that the effort invested in habitat monitoring is inadequate and far lower than the effort specified for an Environmental Assessment under the SRDP Basic Payment Scheme. This would impose considerably higher private costs at no increase in private benefit. Should SNH conclude that the current implementation needs to be improved, there should be a much more detailed analysis of public and private costs and benefits.

Setting land management objectives is often subjective. Within designated sites there is clarity on the desired habitat management outcomes but, in the vast majority of Scotland that falls outwith these sites, the choice of habitat objectives is more subjective, including the distribution of new woodland areas. Defining these objectives and achieving agreement on them will require considerable resources and commitment from SNH. We are aware that current resources within SNH for implementing sustainable deer management are stretched and we therefore believe that substantial new financial commitment will be required. A post-BREXIT rural support scheme might look to support such actions.

The Need for Landscape Scale Partnerships

The development of DMGs is one of the best examples of landscape-scale partnerships in operation in Scotland but even this has its limitations. Many of the most intractable problems of deer management lie at the boundaries of DMGs and result from significant movement of deer between DMGs. There needs to be a better mechanism for either redefining DMG boundaries to reflect deer movements or for working with neighbouring DMGs.

Training and Awareness Raising

Most of the focus in deer management has been on traditional stalking estates in the uplands and on land owned by the Forestry Commission. However, the lack of deer management expertise in the lowlands, for instance amongst community landowners, farmers, owners of small woodlands, local authorities and Transport Scotland, suggests that this knowledge base needs to be considerably broadened. This could form part of the implementation of regional land use partnerships under the Land Use Strategy. The reintroduction of sporting rates may deter land owners from becoming involved with deer management.

Business Rates

There has been publicly expressed concern that the valuation of sporting rates may result in discouraging higher deer culls. The Land Reform Review Group suggested a solution for this: “a revised rate on deer shooting could, for example, be based on the level of deer cull required to protect public interests, and then only be charged when an owner or occupier was not achieving adequate culls”.

The use of business rates may however be a relatively blunt instrument, and it is not yet clear how successful the assessors will be in drawing in all eligible property owners. As noted above, a revised CAP may provide an incentive scheme for improved deer management.
Our own Deer Management Policy stipulates that the decision on whether to cull deer will be taken solely on conservation grounds. Following this decision, the method of delivering the cull can be chosen, and this includes the possibility of charging for recreational stalking. However, it is clear that the conservation of natural habitats and landscape is our primary motivation for culling deer.

**Deer Authorisation System**

As indicated in our response to a previous SNH consultation, we believe effective deer management for ecological purposes is fundamentally frustrated by the current close season for stags.

**Welfare**

Whilst the welfare of deer during the cull is managed with best practice on deer management qualifications and the use of specific ammunition, the welfare of stalkers and others carrying out culls must also be considered.

It can be too easy to forget the impact of a Section 7 reduction target on those who are tasked with implementing it. The job of a stalker requires physical fitness and an ability to work in all weather conditions and in challenging terrains. However, this does not prepare individuals for the relentless nature of a reduction target. Where a reduction cull is in place it will be necessary to consider whether extra personnel can be deployed to assist – if not, the timescale set for the cull must be sensitively considered and the staff wellbeing monitored.