

Report to Scottish Government

External quality assurance of the stakeholder consultation processes used during the 2016 review of the national goose policy framework in Scotland

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Summary

External quality assurance of the stakeholder consultation processes used during the 2016 review of the national goose policy framework in Scotland

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Keywords

quality assurance; stakeholder consultation processes; national goose policy framework

Background

The Scottish Government is committed to reviewing goose management policy on a five-yearly basis. Throughout 2016/17 Scottish Natural Heritage (SNH) reviewed the current goose policy framework, its effectiveness in delivering the policy objectives and the development of a longer term outlook for goose management in Scotland. This work was undertaken on behalf of the Scottish Government, with advice from the National Goose Management Review Group (NGMRG).

To quality assure the review process an independent panel was established by SNH and Scottish Government. The task of the external quality assurance panel was therefore not to evaluate the effectiveness of current goose management policy in delivering the existing National Policy Objectives. The primary request made of the independent panel was that they "... *identify whether the goose policy review has been conducted in an open, fair and transparent manner, treating all stakeholders with impartiality and respect*".

Main findings

- Those individuals who were contacted directly by the policy review authors (primarily members of the NGMRG, some environmental NGOs and members of SNH staff involved in geese management at a regional largely) largely appeared satisfied with stakeholder engagement processes taken by the light review. The panel found no evidence that stakeholders felt that they were not treated with impartiality and respect. However, some did express concern that the turnaround times set for comments on drafts did not allow them either to fully formulate their own views or consult wider themselves.
- However, outside of the above core group of stakeholders who were contacted directly, most of those stakeholders contacted felt that they did not get an opportunity to fully air their views or have them adequately incorporated into the draft review process. A minority felt that they were not adequately informed about the nature of the review process itself to even enable them to formulate and express their views.
- This could have arisen from a combination of factors, summarised as follows:
 - the light touch review may have been inadequately resourced in terms of the capacity of the process to engage;
 - lack of ability of those engaged directly by the report author to consult more widely within defined narrow time limits

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- a misunderstanding of the nature and scope of the review process and the degree to which stakeholders could and were asked to contribute;
- the extended, and ultimately protracted, timescale over which the light touch review process was undertaken may have raised expectations and led some stakeholders to believe, incorrectly, that a larger, more detailed review was being conducted. This potentially led to disappointment when they finally had sight of the review document.
- Overall, the independent panel consider that the policy review was conducted in as professional manner as was possible given the severe time and capacity constraints put upon the policy review author.
- Many stakeholders recognised that the scope of this review was restricted to defining a future direction of travel and a focus for further discussion and management options development, rather than representing a major review recommending structural changes for the immediate future.
- It is, however, clear that many in the wider stakeholder community felt disenfranchised by the processes that were followed and some commentary and observations are provided by the panel at the end of the document with regard to potential improvements for any future such reviews. In summary these are:
 - The range of issues, and limits, to be reviewed should be clearly stated; the reach of the consultation process should be mapped in a target list of stakeholders; issues that emerge during the review process, which fall out-with the terms of reference or scope of the light touch review, should be clearly flagged for further investigation and/or action.
 - Priority stakeholders should be identified in the consultation terms of reference, with recognition that that all relevant stakeholders (i.e. not just those on NGMRG and GSAG) have a role to play in the consultation process; a communication pathway should be identified which recognises the need to involve stakeholders associated with the local goose schemes at a much earlier stage; the consultation should be in a questionnaire format, even if the preliminary review drafts are shared, in order to obtain comments from stakeholders across the full content of the review.
 - A realistic timescale needs to be set for the scope and degree of any future consultations with stakeholders, irrespective of whether the review is light-touch or not. This particularly requires that the process: gives adequate time to incorporate the findings from the existing pilot Greylag and adaptive management schemes; respects the needs of stakeholders to reflect, internally consult and thoughtfully formulate their input to the policy review process; allows for independent and impartial review of the whole policy review process (i.e. not just stakeholder engagement).
- Ensuring that future reviews draw from as wide a range of experiences as possible, provide all relevant stakeholders with the opportunity to engage in the review and incorporates independent and impartial review of the revised policy framework will help to guarantee buy-in, ownership and support across stakeholders for the implementation of the recommendations and actions arising from the review process.

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1. TERMS OF REFERENCE PROVIDED TO THE EXTERNAL QUALITY ASSURANCE PANEL

Scottish Natural Heritage (SNH) is reviewing the current goose policy framework, its effectiveness in delivering the policy objectives and the development of a longer term outlook for goose management in Scotland. This work is being undertaken on behalf of the Scottish Government, with advice from the National Goose Management Review Group (NGMRG). Government is committed to review goose management policy on a 5 yearly basis. The scope of the goose policy review is outlined at Annex 1.

The policy review process is to be assessed by an independent panel for quality assurance purposes and this panel will report directly to the Scottish Government's Cabinet Secretary for Environment, Climate Change and Land Reform.

1.1 Scope of the work

SNH will review the current arrangements for the management of geese in Scotland and report to the Scottish Government in 2017. SNH will evaluate the effectiveness of current goose management policy in delivering the existing National Policy Objectives and it will consider emerging issues and the longer term direction of travel for goose management.

To quality assure the review process an independent panel will consider the Scottish Government's values¹ and, in particular, identify whether the goose policy review has been conducted in an open, fair and transparent manner, treating all stakeholders with impartiality and respect.

1.2 Method

The panel will be appointed by the Scottish Government and bring expertise in goose management, farming practice and environmental policy to their work. The panel of three people will comprise:

- Professor Anthony David Fox, Aarhus University, Denmark
- Mr Nigel Miller, Scottish Borders
- Professor Davy McCracken, Scotland's Rural College

The panel's key task will be to consider the views of stakeholders (including farmers and crofters) and how they have been taken into account in the policy review.

The panel is asked to identify one member to co-ordinate their own proceedings and to act as a first point of contact for stakeholders and with the Scottish Government.

We suggest the panel undertake their work by correspondence and by interviewing the author of policy review. The interviews could be conducted by video conference or by teleconference. The author of the review will provide the panel with a report detailing the process that they have gone through to conduct the policy review, and they will make their draft review available to the panel, together with a list of the relevant stakeholders and a record of meetings or submissions from these stakeholders.

The goose policy review is to be presented to the NGMRG on 26 July 2017. NGMRG may wish to call on the panel for further discussion.

¹ <http://www.parliament.scot/abouttheparliament/31485.aspx>

2. METHODS EMPLOYED BY THE EXTERNAL QUALITY ASSURANCE PANEL

When initially contacted to assess their availability, the members of the independent panel were under the impression that they were going to be asked to review the content of the revised national goose policy framework, the recommendations made and the processes that had been followed in conducting the revision.

When the Terms of Reference were received, it became clear, however, that the primary focus of the independent panel was to “... *identify whether the goose policy review had been conducted in an open, fair and transparent manner, treating all stakeholders with impartiality and respect*”.

The panel recognised from the start that the narrow brief it had been given was likely to cause issues with stakeholders when approaching, as many would be under the false impression that the panel had been engaged to assess the fitness for purpose of the revision. Nevertheless, the panel did not consider that interviewing only the author of the policy review would be sufficient to make an informed assessment of the stakeholder consultation processes undertaken in the review.

The time available for the quality assurance assessment did not allow the panel to conduct detailed one-to-one interviews with the wide range of stakeholders to which to the policy review process was considered of likely relevance. Professor McCracken was identified as the co-ordinator of the Panel’s proceedings and first point of contact as directed in the Panel brief.

The assessment of the stakeholder consultation processes was therefore conducted through a combination of:

- Holding a teleconference with the panel members and the policy review author on 18th July 2017 and subsequent provision of additional background information by the policy review author by email to the panel members.
- Obtaining through July and August 2017 views on the stakeholder engagement processes from stakeholders via the use of a questionnaire, see Annex 2, which in some cases also involved additional clarifications obtained via email, telephone or videoconference, or (in one case) face-to-face interview.
- Summarising the responses obtained from the three different stakeholder groups approached (environmental NGOs, land manager representatives, agency staff leading on goose issues at a national and regional level).
- Drawing overall conclusions about the stakeholder engagement processes undertaken in the policy review and providing commentary on processes of relevance to future stakeholder engagement.

Some of the responses received included detailed comments on the content of the policy review document. These comments are included in the Annexes (Annexes 3 to 19) which contain the full responses from individual stakeholders but are not commented upon in the body of this report if they do not relate directly to the stakeholder engagement processes i.e. the element of the review process that the panel was asked to assess.

3. OVERVIEW OF PANEL DISCUSSION WITH THE POLICY REVIEW AUTHOR

The independent review panel interviewed Rae McKenzie (RMcK), the author of the policy review on 18 July 2017 via Skype conferencing call.

3.1 Background to the review process

The policy review has been undertaken by Scottish Natural Heritage to (i) assess its effectiveness in delivering national goose policy against existing objectives under National Policy Objectives and (ii) to consider emerging issues and the longer-term direction of travel for goose management in Scotland.

SNH are committed to reviewing the current goose policy framework on a regular five year cycle, but the present review was intended to be a relatively “light touch” review process following the major review undertaken in 2011. That previous review had been based upon very extensive and wide consultation and concentrated effort upon developing mechanisms for the delivery of schemes and conflict resolution. The present review concentrated not so much on new initiatives, but on assessing the success and degree of delivery of the existing schemes and offering guidance on some of the emerging issues from the experiences of the previous five years.

As a result of petitions to the Rural Affairs, Climate Change & Environment Committee of Scottish Government regarding increasing agricultural conflict arising from Greylag Geese in many parts of their range, there were particular issues raised about resolving conflicts on the Western Isles with this species. This had prompted a wider internal SNH consideration of conflicts posed by this species throughout Scotland. However, as this species is the subject of several ongoing innovative pilot schemes at present (which are not yet completed or adequately reported), it was not possible to draw on these elements in the current review process, although this will be possible at a later date.

3.2 Stakeholder contacts

The review process had been undertaken by RMcK, with support from half a post, input from Morag Milne and Eileen Stewart within SNH. Consultation was undertaken by RMcK either through direct approach (telephone or e-mail, with contacts and dates supplied to the review panel by RMcK) or during the course of regular Goose Science Advisory Group (GSAG) and National Goose Management Review Group (NGMRG) meetings:

The NGMRG comprises representatives from: NFUS, BASC, SASA, SG, SLF, SCF and SNH.

GSAG comprises representatives from: SASA, SNH, BASC and BTO.

Note: Although WWT and RSPB were informally consulted about the policy review by RMcK they are not members of the NGMRG and they were not therefore in receipt of draft documents or part of the regular consultation that the NGMRG experienced.

The following stakeholders were contacted direct by RMcK:

- BTO: Chris Wernham & Liz Humphreys
- BASC: Colin Shedden
- NFUS: Andrew Bauer
- WWT: Baz Hughes
- RSPB: Paul Walton
- SG: John Gray
- SL&E: Anne Gray

- Bill Dundas (RPID & chair of local goose groups in Argyll and Western Isles)

The following SNH members of staff were consulted by RMcK:

- Eileen Stuart
- Morag Milne
- Margaret Morris
- Alison Gray/Andrew Kent
- Graeme Dalby
- Gail Churchill
- Ewan Lawrie

3.3 The policy review process

At GSAG and NGMRG meeting, drafts of the review document were tabled and discussed. Stakeholders were also engaged to provide their reactions and input to revising the document over time. Because the Royal Society for the Protection of Birds (RSPB) and Wildfowl & Wetlands Trust (WWT) withdrew from participation in NGMRG meetings, there had been little continued dialogue with these organisations and neither RSPB nor WWT had seen the latest draft.

The key elements of the review process were to capture the key achievements and failure of the experiences drawn from the schemes and mechanisms in place, determine the key emerging issues and chart the way forward based on this synthesis, without the opportunities for major restructuring of existing mechanism for delivery. Hence, the major objective was to gain consensus and agreement on progress and determine priorities for where to develop most effectively in the immediate future.

The responses to draft review papers were pooled and incorporated into successive drafts through NGMRG meetings from May 2016 onwards. Although the most recent version of the policy review document had not been formally circulated at the time of the interview with independent review panel, it was subsequently distributed with the documents for the GSAG meeting that was held in July 2017.

RMcK was unclear whether Scottish Crofting Federation had seen the document, but indicated that they had not responded to any approaches despite being the organisation that had petitioned for actions on the Western Isles Greylag Geese.

In response to questions about the difficulty of finding consensus and incorporating a range of conflicting views, RMcK responded that there was generally very little feedback at all from any of the stakeholder organisations. Any issues requiring resolution had been largely achieved through one-to-one telephone conversations. The greatest discussion and debate had revolved around future funding opportunities, which were beyond the scope of the review process.

There had been general widespread agreement among stakeholders about developing single species action plans (SSPs) as being the best way forward and this represented considerable progress and consensus beyond the 2011 review. Broad views had been expressed about the assessment of how far adaptive management of geese on Islay had progressed and how effective this had been, and it had been agreed that this needed to be resolved before going forward. It was clear that there were emerging needs regarding Barnacle Geese away from Islay (where the problems had largely been resolved) which could not await a major policy review but necessitated local solutions, for instance through appropriately designed programmes to issue limited shooting licenses and other management initiatives. As stated above, because the Greylag pilot schemes have yet to report, these could not be included in the review despite some promising results.

Regarding effective consultation with stakeholders involved within existing schemes, RMcK had spoken to local group meetings on Islay (on 7th June 2016 and 6 October 2016 (via chair)) and to chairs of local scheme groups elsewhere by telephone to canvas their opinions and experiences, especially with regard to progress and concerns. She had also circulated the present review document to the SNH staff that provide the secretarial groups to the local schemes 5-6 weeks prior to the interview with the independent review panel, but at the time of interview had received no feedback from any of these. Alongside the discussions with group chairs or SNH staff Rae McK also used the annual reports submitted by LGMGs

4. OVERVIEW OF PANEL CONTACTS WITH WIDER STAKEHOLDERS

The independent review group used a standard questionnaire to explore the experience of all stakeholders approached. The survey was applied through a variety of routes: e-mail, tele-conference, video conference and, in one case, face to face interview.

The independent review panel was tasked to focus on a narrow terms of reference, i.e. to determine the reach of the goose policy review consultation process and the impact of stakeholder engagement on policy development. The response of wider stakeholders to the survey has been analysed and reported on that basis.

4.1 Environmental NGOs

The independent review panel explored the views of three UK organisations, which represent the key players involved in goose policy development in Scotland:

- The British Trust for Ornithology (BTO) is an independent UK charitable research institute combining professional and citizen science observers to gather evidence of change in national bird populations and to inform the public, opinion-formers and environmental policy- and decision-makers of these trends. BTO defend their impartiality to enable the results of their data analysis and interpretation to be used by both Government and campaigning NGOs. BTO strive to retain their impartiality and play no part in political lobbying themselves.
- The Royal Society for the Protection of Birds (RSPB) is the largest nature conservation charity in the UK. RSPB maintains a scientific and data gathering/analytical capacity as well as being involved in reserve acquisition and management for birds and a highly active politically lobbying organization.
- The Wildfowl & Wetlands Trust (WWT) is a UK scientific and conservation organization dedicated to saving global wetlands, with particular emphasis on saving rare wetland birds.

RSPB and WWT resigned from the Scottish National Goose Management Review Group (NGMRG) in 2015. This coincided with their joint submission of a complaint to the European Commission regarding the SNH/Scottish Government/National Farmers Union of Scotland Islay Goose Strategy, because of their difficulty in accepting its alignment with the existing requirements of the European Union's Birds Directive in respect of Greenland White-fronted and Barnacle Geese. As result, these organisations were not consulted about the content of the Policy Review. Neither were they privy to versions of the goose policy review process subsequent to that point in time, which greatly restricted their ability to answer questions about its detailed content and the degree to which their prior and subsequent representations to SNH had been incorporated into the document.

RSPB have yet to see the policy review document and therefore their views were not especially enlightening to the review process reporting here (Annex 3). This explains the almost total absence of their views in this synthesis. The Quality Assurance Panel provided WWT with a draft and they were therefore a little more forthcoming (Annex 4), but were also far less involved in the consultation process because of their non-attendance at NGMRG meetings.

WWT felt strongly that SNH had missed a major opportunity to involve all the relevant stakeholders (whether represented on GSAG/NGMRG or not) in developing the terms of reference for the policy review to ensure buy-in and continued support and development from the initiation of the process. They also considered that it was a major failure that the present policy assurance process reporting here only considered stakeholder satisfaction with the process and that there was no independent, impartial review of the policy review itself, as had been undertaken by BTO in the last round of revision. WWT had had a telephone discussion with one of the review panel in February 2017 at which WWT provided five key issues the organization considered should be considered, but which did not appear in the final review. WWT had not been asked to provide detailed comments on the most recent draft of the review, but on seeing the most recent draft, accepted that all of the five had been addressed to some degree. However, one issue was not addressed to the satisfaction of WWT (that of the banning of lead shot to cull geese), while a fifth (inadequate flyway scale stakeholder engagement) was only addressed going forward in time.

WWT asserted that they believed their input had led to modifications to the Review Policy, but BTO, RSPB and WWT all considered that SNH taking the lead on undertaking this review even with an external quality assurance process was not acceptable, as this amounted to reviewing their own operations when many stakeholders wished for external influence on this process. WWT were also concerned about the very major delays to the overall process and BTO indicated their frustration with the severe and short time constraints placed upon responding to drafts. This frequently meant that the time for preparation of an adequate response, the degree of consultation within the organization and with other stakeholders was usually too short to ensure adequate responses.

BTO are impartial and non-lobbying and therefore provided no responses to the policy elements of the policy review, which they contend should be based on the best possible available evidence (Annex 5). Their involvement with GSAG meant they had seen a succession of drafts of the review and had input to the drafting process over time, unlike RSPB or WWT. BTO expressed satisfaction that their views had adequately been incorporated into the final draft, although they were concerned the massive cost savings achieved by contributions of volunteers were not adequately reflected in the document.

4.2 Land management representatives

The Land management category of stakeholders included crofters, farmers and land owners, their representative organisations (including SGRPID) and the local goose management groups. The stakeholder respondents were categorised into three groups:

- Representatives of land management organisations with membership of the NGMRG, namely NFUS, SCF, SGRPID and SL&E (Annexes 6 to 9).
- Local Goose Management Groups. These groups have a significant part of their membership directly involved with crofting and farming. However, there are also representatives of conservation organisations, SNH and SGRPID who were also involved in moulding the local group views captured by the survey process (Annexes 10 to 15).

- Individuals or organisations operating in areas where goose impacts are significant but where there is no formal goose management in place (Annex 16).

4.2.1 *NGMRG Representatives*

Views were sought from representatives serving on the NGMRG. Patrick Krause of the SCF delegated the SCF response to a colleague, David Muir, who is a member of the Lewis and Harris Local Goose Group. Bill Dundas who represents SGRPID on the NGMRG (and also serves as Chair to three local goose groups) submitted views on behalf of SGRPID and also participated in the local goose group tele/video-conferences.

All the members of the NGMRG approached were aware of the Policy Review and all had an opportunity to contribute to policy development. The SCF response, however, expressed some reservations about its ability to influence the goose policy review (Annex 7). All other representatives believed that they had influenced the policy development process. Although the NGMRG was the main pathway into policy development, there was also contact with GSAG and direct representations were made to the policy review author Rae McKenzie.

NGMRG Representatives recognised that many of the issues they had contributed to the Policy Review process had been captured within the draft report. The level of satisfaction varied between individuals and across the policy landscape. Bill Dundas articulated a sentiment shared by others, when he expressed a level of satisfaction over the policy direction linked to protected geese species (Barnacle and White-front) management but disappointment at the policy position on the management of Greylag Geese (Annex 8).

Members of NGMRG did however identify several issues that had not been addressed by the policy review process:

- The failure to synchronise the policy review with the review of the adaptive management pilots devalued the overall policy package and had created uncertainty. The lack of any interim measures to mitigate the policy void has exacerbated the problems on the ground.
- The opportunity to redefine the role of local goose groups had not been progressed. Stakeholders believed local groups have the potential to take further responsibility for goose management.
- The opportunity to redefine the role and terms of reference of the NGMRG has not been progressed. The present role, as an advisory group, is too restricted and fails to create a synergy with the local goose groups.
- The policy framework fails to recognise the reality of community ownership.
- The review has not recognised the role of public education. Goose management should be supported by an effort to explain interventions and the value of sustainable goose populations in underpinning habitats and economic activity.
- The goose policy roadmap will require increased funding and cannot be driven by self-help at this stage. New sources of funding should be explored.

4.2.2 *Local Goose Groups*

The following groups were approached and responded; Solway Group (Annex 10), Islay Group (Annex 11), Tiree and Coll Group (Annex 12), Uists Group (Annex 13), Lewis and

Harris Group (Annex 14) and Orkney Group (Annex 15). Meeting schedules and holiday commitments meant that the Kintyre group was unable to contribute.

Only the Solway group respondent was clearly aware of the light touch goose policy review and responded through the local SNH representative. No other group believed that there was clarity over the policy review process.

The Islay Group was aware as the review progressed. However without a formal consultation process the group did not formulate or submit views to SNH. All other groups were either unaware or only aware at a late stage. In some cases individual members of a group had information on the policy review while others were unsighted. There was no clear invitation or pathway at local group level to contribute to the policy review process. No local group made formal representations with the exception of the Solway Group.

Briefings from NGMRG representatives were circulated to members involved with local groups but appear not to have facilitated a significant flow of information. Some views however were captured and informed NGMRG members.

Local Goose Group members felt they should have had an opportunity to submit their views to the policy review. All the local goose groups approached articulated a range of policy concerns and issues (Annexes 10 to 15). The exclusion of the majority of Local Goose Groups from the consultation process has inevitably reduced their confidence in the goose policy review.

The Solway Group did submit views to the goose policy review. Of the local groups only the Solway group was largely satisfied with the process. The goose policy review was seen as positive by the Solway group representative. However he expressed one concern:

- With increasing goose populations, and new regions being impacted by goose foraging, future goose monitoring and management costs can only increase. Those funding issues should have been addressed.

4.2.3 Stakeholders out-with the formal goose management areas

Individuals or groups were approached in areas where goose pressures have been reported: Dumfries and Galloway, Loch Lomond, Luing, North East Scotland, and Skye. There were no responses to the independent review panel survey except for Skye NFUS which had received briefings on the goose policy review from the NFUS NGMRG representative and was therefore aware of the policy development process (Annex 16). However, with no formal consultation pathway Skye NFUS made no formal representation to SNH or NGMRG.

4.3 Agency staff leading on goose issues at a national and regional level

Views were sought from Gill Hartley (SASA and Chair of CSAG) and four SNH members of staff whom the policy review author had indicated had been consulted in the review process because of their 'lead' on goose issues at a regional level. Three responses were received (Annexes 17 to 19).

Gill Hartley indicated that she had contributed to the review process through the NGMRG in her capacity as chair of GSAG (Annex 17). GSAG members were asked for comments on drafts of the review provided in January and May 2017, but, as the comments from BTO in Annex 5 highlight, the turnaround times requested for comments meant that BTO were unable to contribute to the GSAG response and had to speak directly to SNH. Although Gill did have sight of the final draft of the document (provided in advance of the July NGMRG meeting) neither she nor GSAG had had the opportunity to contribute any additional

comments into that draft and which contained some elements she was previously unaware of. In particular, section 8 indicates that “GSAG are asked to consider developing work to examine the impacts or potential impacts of increasing goose numbers on species and habitats of conservation importance.” However, this is not something that has been discussed before at GSAG and need to be discussed in detail before any commitment can be made.

Alison Gray of SNH on Islay had primarily been involved with providing Islay Goose Management Scheme related information to RMcK and had not been involved in any major discussions of policy (Annex 18). She indicated that she had had opportunities to input to the review document and appeared satisfied with the processes followed.

Graeme Dalby of SNH Dumfries and who administers the Solway Goose Management Scheme indicated (Annex 19) that he had had various discussions with RMcK during the development of the review document. This ensured that the outline of review was discussed at a couple of local goose group meetings and that the topic had also been raised during conversations with individual goose group members and individual farmers during the past year (see Annex 10). He had also hosted a visit from RMcK in March 2017 and provided information for the Solway area based on early drafts of the document. He also provided comments on the review document itself which are outside the scope of this stakeholder engagement assessment process but which are reproduced in full in Annex 19.

No responses were received from Ewan Lawrie, SNH Aberdeen, or Gail Churchill, SNH Orkney, who had been approached to complete the questionnaire on the basis of their engagement in goose issues in eastern-Scotland and Orkney, respectively.

5. PANEL CONCLUSIONS

5.1 Stakeholder engagement process undertaken in the 2016 policy review

The task of the external quality assurance panel was not to evaluate the effectiveness of current goose management policy in delivering the existing National Policy Objectives, but to quality assure the review process. The primary request made of the independent panel was that they “... *identify whether the goose policy review has been conducted in an open, fair and transparent manner, treating all stakeholders with impartiality and respect*”.

Those individuals who were contacted directly by the policy review author (primarily members of the NGMRG, some environmental NGOs and members of SNH staff involved in geese management at a regional largely) largely appeared satisfied with stakeholder engagement processes taken by the light review. The panel found no evidence that stakeholders felt that they were not treated with impartiality and respect. However, some did express concern that the turnaround times set for comments on drafts did not allow them either to fully formulate their own views or consult wider themselves.

However, outside of the above core group of stakeholders who were contacted directly, most of those stakeholders contacted felt that they did not get an opportunity to fully air their views or have them adequately incorporated into the draft review process. A minority felt that they were not adequately informed about the nature of the review process itself to even enable them to formulate and express their views. This could have arisen from a combination of factors, summarised as follows:

- the light touch review may have been inadequately resourced in terms of the capacity of the process to engage.

- lack of ability of those engaged directly by the report author to consult more widely within defined narrow time limits.
- a misunderstanding of the nature and scope of the review process and the degree to which stakeholders could and were asked to contribute.
- the extended, and ultimately protracted, timescale over which the light touch review process was undertaken may have raised expectations and led some stakeholders to believe, incorrectly, that a larger, more detailed review was being conducted. This potentially led to disappointment when they finally had sight of the review document.

Overall, the independent panel consider that the policy review was conducted in as professional manner as was possible given the severe time and capacity constraints put upon the policy review author.

Many stakeholders recognised that the scope of this review was restricted to defining a future direction of travel and a focus for further discussion and management options development, rather than representing a major review recommending structural changes for the immediate future.

It is, however, clear that many in the wider stakeholder community felt disenfranchised by the processes that were followed and some commentary and observations are provided by the panel in section 5.2 with regard to potential improvements for any future such reviews.

ADDENDUM: Following submission of the draft final report, the Independent Review Panel was asked by SNH and Scottish Government to comment on how information appeared to flow between Local Goose Management Groups and their national representatives on the NGMRG. The panels response is provided in Annex 20.

5.2 Commentary on removing the barriers to positive stakeholder engagement

5.2.1 Can a light touch review process deliver positive outcomes for stakeholders?

The light touch review concept clearly indicates to all involved that the review process will be restricted in its activity, and may be constrained by the level of resource allocated. That in itself may be a positive for stakeholders, if it provides an affordable review process and an opportunity for a light footed and prompt reassessment of policy direction which otherwise would have been lost.

There are dangers however that a restricted process fails to address areas of concern to stakeholders and that a limited level of consultation excludes stakeholders with a legitimate interest in the process. In short, a light touch approach may raise expectations amongst stakeholders which cannot be delivered, as was evident from comments made by some stakeholders approached by the Independent Review Panel.

It is likely that a light touch approach will be required in future reviews and hence the approach should not be excluded. However, a greater level of transparency is required from the out-set. In particular:

- The range of issues, and limits, to be reviewed should be clearly stated.
- The reach of the consultation process should be mapped in a target list of stakeholders (see 5.2.2 below).

- Issues that emerge during the review process, which fall out-with the terms of reference or scope of the light touch review, should be clearly flagged for further investigation and/or action.

5.2.2 *What are the options for improving stakeholder engagement?*

The light touch Review of Goose Policy was largely successful in communicating and responding to professional stakeholders and those directly involved with the NGMRG. The majority of these stakeholders believed the consultation process had been positive.

Stakeholders working across localities and the islands with significant goose populations, including those within the local goose group structure, were less engaged or unaware of the review process. However, such local goose groups - with their direct role in the implementation of goose policy, with direct links into communities and a membership which brings conservation and land-use interests together into a cohesive forum – should be considered as highly significant stakeholders. To ensure the reach of any future consultation is increased a targeted approach will be required:

- Priority stakeholders should be identified in the consultation terms of reference, with recognition that that all relevant stakeholders (i.e. not just those on NGMRG and GSAG) have a role to play in the consultation process.
- A communication pathway should be identified which recognises the need to involve stakeholders associated with the local goose schemes at a much earlier stage.
- The consultation should be in a questionnaire format, even if the preliminary review drafts are shared, in order to obtain comments from stakeholders across the full content of the review.

Some stakeholders commented that the turnaround times requested for comments on drafts of the review did not allow them sufficient time to consult more widely. A realistic timescale therefore needs to be set for the scope and degree of any future consultations with stakeholders, irrespective of whether the review is light-touch or not. This particularly requires that the process:

- Gives adequate time to incorporate the findings from the existing pilot Greylag and adaptive management schemes.
- Respects the needs of stakeholders to reflect, internally consult and thoughtfully formulate their input to the policy review process.
- Allows for independent and impartial review of the whole policy review process (i.e. not just stakeholder engagement)

Ensuring that future reviews draw from as wide a range of experiences as possible, provide all relevant stakeholders with the opportunity to engage in the review and incorporates independent and impartial review of the revised policy framework will help to guarantee buy-in, ownership and support across stakeholders for the implementation of the recommendations and actions arising from the review process.

ANNEX 1: THE COMMISSION AND OUTLINE SCOPE FOR THE QUINQUENNIAL REVIEW OF THE GOOSE POLICY FRAMEWORK IN SCOTLAND

Context: SNH is reviewing the current goose policy framework, its effectiveness in delivering the policy objectives and the development of a longer term outlook for goose management in Scotland. This work is being taken as a result of existing commitments of the National Goose Management Review Group (NGMRG) to review goose management policy on a 5 yearly basis and builds on deliberations of the Scottish Parliament's Rural Affairs Climate Change & Environment (RACCE) Committee on the petition regarding the control of wild goose numbers.

Scope of work: SNH will deliver a report to Scottish Government by summer 2017 on the review of current arrangements for the management of geese in Scotland. An evaluation of the effectiveness of current goose management policy in delivering the existing National Policy Objectives will be made and consideration will be given to emerging issues and the longer term direction of travel for goose management.

- By way of context, the report will provide a short overview of the current delivery of goose management in Scotland and an estimate of costs. A summary of current knowledge about goose populations and trends for all species will be presented.
- The report will provide a brief summary of existing goose schemes, including a summary of the review of the greylag goose adaptive management pilot schemes which is to be completed this summer. The report will not include a full review of winter schemes or payment rates associated with these as this work was completed in 2015.
- The report will also provide an assessment of progress with recommendations set out in previous reviews.
- The report will include advice on possible longer term approaches to goose management.
- The report will be prepared by SNH staff, in discussion with colleagues in other public agencies. The work will be overseen by the National Goose Management Review Group. An external quality assurance process will review the quality of the evidence and validity of conclusions drawn from this evidence.

Outline content of report

- Overview of current goose management policy
- Overview of current management arrangements, covering structures, processes and estimated costs of current delivery.
- Goose Populations and Trends. Presenting information from goose counts across Scotland, including national and international trends.
- Planning and Implementing Goose Policy. Progress with winter schemes, progress with adaptive management pilots. Delivery of policy objectives.
- Longer term options and indicative direction of travel.

- Flyway planning and Scottish involvement with range states on future management of goose populations. Involvement with existing flyway plans and outlining issues with current Greenland white-fronted goose population decline.
- Overview of current funding and consideration of other funding sources in the medium to longer term.
- Continued development of self-help approaches to goose management.
- Consideration of existing licencing arrangements and hunting seasons.
- Evaluation of the greylag adaptive management pilots including effectiveness of management actions and progress with the sale of goose meat.
- Consideration of interim measures for management of protected geese in non-goose scheme locations, particularly focussing on crofting areas.
- Consideration of developing consistent damage measurement assessments.
- Consideration of evidence base and future research requirements.
- Emerging issues, including air safety and public health.

External QA: The report will be reviewed by an external panel, established to include independent representation as requested by RACCE.

ANNEX 2: QUESTIONNAIRE SENT TO WIDER STAKEHOLDERS

Goose policy development – 2016-17 light touch review. Stakeholder Survey

The detailed review of Scotland's goose policy published in 2011 has underpinned goose conservation and population management to the recent past. This document was planned to be reviewed every 5 years as a mechanism to contribute to defining the future direction of policy development.

Scottish Natural Heritage (SNH) have just carried out such a 5 year "light touch" review of goose policy which is now near completion. We (Tony Fox, Nigel Miller and Davy McCracken) have been requested to assess the effectiveness of the consultation process and in this respect would greatly value your answers to some key questions about you and your organisation's involvement and contribution to the process. These are as follows:

- 1] Are you aware of the SNH 2016-17 Review of goose policy process?
- 2] Have you [or your organisation] had an opportunity to contribute to the review process?
- 3] If you contributed to this review process, did you do so directly to SNH or through the National Goose Management Review Group (NGMRG)/ Goose Scientific Advisory Group (GSAG)?
- 4] What areas of goose policy are a priority for you and your organisation?
 - A] Goose population monitoring- methodology and/or logistics.
 - B] Species specific management programmes.
 - C] Habitat monitoring.
 - D] Assessment of impact on other species, land use and economic activity.
 - E] Linking management strategies to objective intervention indicators.
 - F] Cost benefit of non-lethal scaring or provision of sacrifice crops.
 - G] Cost benefit of adaptive management.
 - H] Future structure and funding of monitoring.
 - J] Future delivery of population management and funding.
 - K] Structures and governance of goose conservation and management at national and regional levels.
- 5] Which of these policy areas did you or your organisation seek to influence?
- 6] Have you and your organisation seen the latest version of the SNH 2016-17 Review (presented to the most recent meeting of NGMRG and sent out with the agenda for that meeting)?
- 7] Are you aware of how the representations from you and your organisation have been incorporated into the ultimate draft?
- 8] What other goose policy issues did you identify?
- 9] Do you believe the review process adequately reflects your concerns?
- 10] Do you believe the review process was modified on the basis of input from you and your organisation?
- 11] Do you have other comments or observations about the review process and your engagement in this?

ANNEX 3: RESPONSE FROM THE ROYAL SOCIETY FOR THE PROTECTION OF BIRDS (RSPB)

1] Are you aware of the SNH 2016-17 Review of goose policy process?

Yes.

2] Have you [or your organisation] had an opportunity to contribute to the review process?

Yes, but rather informally: we had a face-to-face interview with SNH- Rae McKenzie, Eileen Stuart and Morag Milne, in late July 2016. We have had no further discussion since, however. The interview was conducted in an open, helpful and professional manner, and we were able to articulate our views. It is impossible, however, to assess how this has contributed without seeing the actual review document. We are keen that this limitation on how effectively we can answer these questions is reflected in outputs.

3] If you contributed to this review process, did you do so directly to SNH or through the National Goose Management Review Group (NGMRG)/ Goose Scientific Advisory Group (GSAG)?

As above – we resigned membership of NGMRG, alongside WWT, in 2015, when we submitted a Complaint to the European Commission regarding the SNH/Scottish Government/NFUS Islay Goose strategy and its alignment with the requirements of the Birds Directive with respect to Greenland barnacle geese and Greenland white-fronted geese.

4] What areas of goose policy are a priority for you and your organisation?

- A] Goose population monitoring- methodology and/or logistics
- B] Species specific management programmes
- C] Habitat monitoring
- D] Assessment of impact on other species, land use and economic activity
- E] Linking management strategies to objective intervention indicators
- F] Cost benefit of non-lethal scaring or provision of sacrifice crops
- G] Cost benefit of adaptive management
- H] Future structure and funding of monitoring
- J] Future delivery of population management and funding.
- G] Structures and governance of goose conservation and management at national and regional levels.

All of the above are relevant to goose management decisions, in differing ways and depending on circumstance, location, species, etc (and the list is not exhaustive - for example, the relationship between goose density, control and agricultural damage is a key consideration). Thus it would be difficult and perhaps misleading for us to rank the list or to pick specific policy areas over others.

5] Which of these policy areas did you or your organisation seek to influence?

Over the course of our NGMRG membership and before that, all of these. Via our review interview, only indirectly.

6] Have you and your organisation seen the latest version of the SNH 2016-17 Review (presented to the upcoming meeting of SGMRG sent out with the agenda for that meeting)?

No (see above).

7] Are you aware of how the representations from you and your organisation have been incorporated into the ultimate draft?

No. SNH inform us that the likely timescale for the review to be published is mid-September 2017

8] What other goose policy issues did you identify?

N/A

9] Do you believe the review process adequately reflects your concerns?

N/A

10] Do you believe the review process was modified based on input from you and your organisation?

N/A

11] Do you have other comments or observations about the review process and your engagement in this?

Not before we see the Review itself.

ANNEX 4: RESPONSE FROM WILDFOWL & WETLANDS TRUST (WWT)

1] Are you aware of the SNH 2016-17 Review of goose policy process?

Yes.

2] Have you [or your organisation] had an opportunity to contribute to the review process?

Partly – I had a telephone conversation with Rae McKenzie in February after she had sent me a first draft of the commissioning statement outlining what the review might cover, seeking WWT's views on what issues the review should cover. However I had not seen the review document itself until Tony sent it to me on 26 July. So I had the opportunity to advise on the process, and the issues the review should cover, but did not have the opportunity to comment on the report.

The points I made in the telephone conversation were:

1. The report should not be anywhere near as long as the previous 100+ page review.
2. SNH leading the review themselves is unacceptable – as they are effectively reviewing their own operations. The main stakeholders (whether or not they are members of GSAG/NGMRG) should have had input at Terms of Reference stage. Review of the report in an external quality assurance process is not sufficient to achieve stakeholder buy in. At the very least, the review should have been conducted by an independent organisation such as BTO (like last time).
3. Key issues WWT would wish to see considered:
 - a. Has stakeholder engagement been adequate and, if not, how could it be improved? Both nationally and for local goose management schemes.
 - b. Has flyway scale stakeholder engagement been adequate and, if not, how could it be improved?
 - c. Is the science / evidence base for goose management adequate (e.g. lack of national bag stats, research on the effectiveness of non-lethal alternatives to culling, relationship between geese, agricultural damage and farm incomes).
 - d. Lead shot should not be used in any culling activities as there is evidence that lead is harmful to birds (mainly waterbirds and birds of prey) and to human health.
 - e. Should there be other National Policy Framework objectives, such as societal and economic benefits of geese)?
4. I was then going to make detailed comments on the review itself but have not been invited to do so by SNH.

3] If you contributed to this review process, did you do so directly to SNH or through the National Goose Management Review Group (NGMRG)/ Goose Scientific Advisory Group (GSAG)?

Directly to SNH – phone call – see above for issues raised.

4] What areas of goose policy are a priority for you and your organisation?

- A] Goose population monitoring- methodology and/or logistics
- B] Species specific management programmes
- C] Habitat monitoring

- D] Assessment of impact on other species, land use and economic activity
- E] Linking management strategies to objective intervention indicators
- F] Cost benefit of non-lethal scaring or provision of sacrifice crops
- G] Cost benefit of adaptive management
- H] Future structure and funding of monitoring
- J] Future delivery of population management and funding.
- G] Structures and governance of goose conservation and management at national and regional levels.

All of the above.

5] Which of these policy areas did you or your organisation seek to influence?

We seek to influence all of the above, but couldn't do this as part of the review process as we weren't sent the review for comment by SNH.

6] Have you and your organisation seen the latest version of the SNH 2016-17 Review (presented to the upcoming meeting of NGMRG sent out with the agenda for that meeting)?

This was not sent to me by SNH, but Tony sent it to me on 26 July.

7] Are you aware of how the representations from you and your organisation have been incorporated into the ultimate draft?

After just reading it I am now. The key issues we raised were:

1. Has stakeholder engagement been adequate and, if not, how could it be improved? Both nationally and for local goose management schemes. *This was addressed.*
2. Has flyway scale stakeholder engagement been adequate and, if not, how could it be improved? *This was not addressed but has been included in the recommendations going forwards.*
3. Is the science / evidence base for goose management adequate (e.g. lack of national bag stats, research on the effectiveness of non-lethal alternatives to culling, relationship between geese, agricultural damage and farm incomes). *This was addressed.*
4. Lead shot should not be used in any culling activities as there is evidence that lead is harmful to birds (mainly waterbirds and birds of prey) and to human health. *This was addressed, but not to our satisfaction.*
5. Should there be other National Policy Framework objectives, such as societal and economic benefits of geese)? *This was addressed.*

8] What other goose policy issues did you identify?

As noted in the review (page 13), RSPB and WWT submitted a complaint to the European Commission in August 2015 (not October 2014 as stated in the review) concerning a failure to comply with EU law in respect of the management of geese species, and SPAs classified for these and other geese, on the island of Islay, Scotland.

9] Do you believe the review process adequately reflects your concerns?

Not quite sure what this means. Our main concerns about past process (poor stakeholder engagement especially at a flyway level) have been addressed and we welcome the action planning approach recommended in the review and the plans to thoroughly review research and monitoring requirements for goose management in Scotland.

10] Do you believe the review process was modified based on input from you and your organisation?

Yes.

11] Do you have other comments or observations about the review process and your engagement in this?

As stated above, SNH leading the review themselves, even with an external quality assurance process, is unacceptable – as they are effectively reviewing their own operations. The process was considerably delayed as the original scope of work stated “*SNH will deliver a report to Scottish Government by the end of September 2016 on the review of current arrangements for the management of geese in Scotland*”.

WWT were not asked by SNH for comments on the review document.

ANNEX 5: RESPONSE FROM BRITISH TRUST FOR ORNITHOLOGY (BTO)

1] Are you aware of the SNH 2016-17 Review of goose policy process?

Yes. Through the BTO's involvement with GSAG we were aware that a review was going to be undertaken.

2] Have you [or your organisation] had an opportunity to contribute to the review process?

Yes – see below for further details.

3] If you contributed to this review process, did you do so directly to SNH or through the National Goose Management Review Group (NGMRG)/ Goose Scientific Advisory Group (GSAG)?

The BTO were contacted by SNH as an interested stakeholder, and as authors of the last more comprehensive review, in June 2016 to provide comment on SNH's commissioning statement (5 YEARLY REVIEW OF THE NATIONAL GOOSE POLICY FRAMEWORK IN SCOTLAND, dated April 2016). Responses were provided over the phone and were not formally documented.

The BTO have also being involved through GSAG in helping to develop thinking around the monitoring plan (yet to be finalised). Also in our capacity as GSAG members, we were asked to comment on two draft versions of the policy review document. The first was sent on the 20th of January 2017 and the latter was sent on the 8th of May 2017. In both cases responses had to be provided quickly (within 11 and 5 days respectively) and restricted our input into the process to due time constraints and other work commitments. Therefore we only provided brief comments on the second version.

4] What areas of goose policy are a priority for you and your organisation?

- A] Goose population monitoring- methodology and/or logistics YES
- B] Species specific management programmes YES
- C] Habitat monitoring YES
- D] Assessment of impact on other species, land use and economic activity
- E] Linking management strategies to objective intervention indicators
- F] Cost benefit of non-lethal scaring or provision of sacrifice crops
- G] Cost benefit of adaptive management
- H] Future structure and funding of monitoring YES
- J] Future delivery of population management and funding.
- G] Structures and governance of goose conservation and management at national and regional levels.

5] Which of these policy areas did you or your organisation seek to influence?

The BTO is impartial non lobbying organisation and hence we would not seek to influence policy per se. We always advocate that decisions should be based on the best available evidence however.

6] Have you and your organisation seen the latest version of the SNH 2016-17 Review (presented to the upcoming meeting of SGMRG sent out with the agenda for that meeting)?

We were provided with the apparent final document through GSAG on the 27th July 2017. This is the same version provided to NGMRG dated the 26th July.

7] Are you aware of how the representations from you and your organisation have been incorporated into the ultimate draft?

Although specific comments to any issues raised in our (limited) written comments have not been addressed directly with us, it would appear that they have been largely addressed in the final draft.

One major omission, however, is the time contributions by other made by volunteers in helping deliver the actual monitoring work or by organisations sitting on NGMRG or GSAG. This represents a large cost saving to SG and is not adequately highlighted in this document.

We would still question the extent to which an organisation such as SNH can objectively evaluate the extent to which its own goose management schemes and other policy delivery mechanisms are effective. An external review would have provided more transparency and would have arguably been a more objective assessment.

8] What other goose policy issues did you identify?

Not applicable.

9] Do you believe the review process adequately reflects your concerns?

Yes but please see caveats above to the extent to which the BTO could engage with the process.

10] Do you believe the review process was modified based on input from you and your organisation?

Yes but please see caveats above to the extent to which the BTO could engage with the process.

11] Do you have other comments or observations about the review process and your engagement in this?

A short turn around for comments despite a lengthy reporting period has limited the amount of involvement that the BTO could provide.

ANNEX 6: RESPONSE FROM NATIONAL FARMERS UNION FOR SCOTLAND (NFUS)

1] Are you aware of the SNH 2016-17 Review of goose policy process?

Yes

2] Have you [or your organisation] had an opportunity to contribute to the review process?

Yes

3] If you contributed to this review process, did you do so directly to SNH or through the National Goose Management Review Group (NGMRG)/ Goose Scientific Advisory Group (GSAG)?

To both SNH and NGMRG

4] What areas of goose policy are a priority for you and your organisation?

- A] Goose population monitoring- methodology and/or logistics.
- B] Species specific management programmes.
- C] Habitat monitoring.
- D] Assessment of impact on other species, land use and economic activity.
- E] Linking management strategies to objective intervention indicators.
- F] Cost benefit of non-lethal scaring or provision of sacrifice crops.
- G] Cost benefit of adaptive management.
- H] Future structure and funding of monitoring.
- J] Future delivery of population management and funding.
- K] Structures and governance of goose conservation and management at national and regional levels.

All policy areas were considered a priority [A to K]. Comments regarding each point are captured under question 5.

5] Which of these policy areas did you or your organisation seek to influence?

5a] Goose population monitoring - the development of a methodology which is workable in the field is a priority.

5b] Species specific management programmes - protected species, an important development to enable a consistent approach across all regions and islands. Establishing goose training or habituation techniques will be important in the management of complex population mixes.

5c] Habitat monitoring - an understanding of the goose impact on ecosystems must be quantified to establish sustainable population targets.

5e] Intervention indicators - sensitive indicators which can be identified and monitored by lay observers are required to build the evidence base to trigger timely intervention.

5f] Cost benefit of management interventions - The baseline costs of goose grazing require further research.

5g] Cost benefit of adaptive management - with pilots still to report a greater understanding may be delivered; however factors like the development of wider markets for goose meat may be crucial to underpin sustainable programmes.

5h] Future funding of population monitoring - as new regions are impacted by a growing goose population funding will face new pressures; however smarter assessment approaches and intervention indicators should help deliver an understanding of populations.

5j] Future funding of goose population management - funding will continue to be a vital catalyst for action and demands are growing. It is not an option to use SRDP funding as there are already diverse and important demands on this limited budget. New sources of funding must be found. A tourist tax or ferry tax might be a source of funding.

5k] Structures and Governance - structures are over complex with functions operating in silos which is unhelpful. Delivery of policy depends on the activity of local goose groups which have limited resources and are under-funded.

A risk averse culture can slow decision making and has meant that valuable initiatives that have been rolled out have not been welded into an effective nation-wide package. A structure which provides stronger leadership can optimise the impact of policy development.

6] Have you and your organisation seen the latest version of the SNH 2016-17 Review (presented to the most recent meeting of NGMRG and sent out with the agenda for that meeting)?

Yes

7] Are you aware of how the representations from you and your organisation have been incorporated into the ultimate draft?

Representations have been compromised by the decision to maintain a 'light-touch' approach despite rapidly developing goose population pressures.

8] What other goose policy issues did you identify?

There is a public education role to increase awareness of goose issues and the value of intervention in supporting sustainable goose populations, habitats and land use.

9] Do you believe the review process adequately reflects your concerns?

No. Recognising the constraints on the process the SNH goose policy review is a professional and valuable piece of work which will provide future direction. The proposed single species management plans have the potential to lift sustainable goose management to a higher level and can feed into the flyway approach. International collaboration around the flyway concept will be of real value although it is unlikely to deliver in a short timescale. The proposal to involve regional stakeholders in the development of single species plans is of value. During the SNH review process, NFUS repeatedly canvassed views from key local farmers and crofters but there was no formal consultation by SNH or Scottish Government. The consultation on single species management plans if rolled out across the regions and islands has the potential to fine tune policy and capture views which were lost to the core review.

10] Do you believe the review process was modified on the basis of input from you and your organisation?

The value of the review would have been increased if the outputs of the adaptive management pilot schemes could have been captured and used to inform policy development

ANNEX 7: RESPONSE FROM SCOTTISH CROFTING FEDERATION (SCF)

1] Are you aware of the SNH 2016-17 Review of goose policy process?

Yes; the Scottish Crofting Federation is a member of the NGMRG and the review formed part of documents circulated before the last meeting.

2] Have you [or your organisation] had an opportunity to contribute to the review process?

The SCF has had little opportunity to contribute to the review process in so far as consulting its members on the contents of the review document. The document mentions that SNH was unable to consult with the SCF as we did not respond to attempts to contact us. This is incorrect as contact details for staff and office bearers are clearly available on our website.

The SCF has representation on local goose management groups such as in Uist and has found that local groups had little or no knowledge of the review.

3] If you contributed to this review process, did you do so directly to SNH or through the National Goose Management Review Group (NGMRG)/ Goose Scientific Advisory Group (GSAG)?

We expressed our views on the review process at the NGMRG meeting.

4] What areas of goose policy are a priority for you and your organisation?

A] Goose population monitoring- methodology and/or logistics. Yes; SCF members take part in biennial counts of geese species as population monitoring is seen as an important management tool for population modelling.

B] Species specific management programmes. Yes; development of individual species action plans could be beneficial but in specific locations where significant agricultural and environmental damage occurs, such as caused by increasing numbers of barnacle geese in North Uist and Tiree, numbers must be effectively controlled. However, as part of its development, beneficial impact of species specific management should be demonstrated to and agreed with crofters and farmers whose businesses currently suffer from goose damage.

C] Habitat monitoring. Crofting is seen as providing environmental benefits and resulting public goods. Habitat monitoring which takes account of the crofting landscape is important.

D] Assessment of impact on other species, land use and economic activity. Yes; damage caused by geese, for example to machair crops, has had significant impact on practices used by crofters in sowing and harvesting, which has implications for other species such as ground nesting birds. Making assessments of these impacts is important for design of future goose management, but must be done in consultation with land users and in reasonably simple form.

E] Linking management strategies to objective intervention indicators. Yes; but management strategies must have interventions which can be clearly demonstrated to those affected on the ground.

F] Cost benefit of non-lethal scaring or provision of sacrifice crops. No; although all methods should be considered, lethal scaring has been seen to be the most effective factor is in keeping goose numbers under control. Sacrificial crops only serve to feed geese leading to greater brood numbers of, for example, greylags.

G] Cost benefit of adaptive management. No; present adaptive management schemes are seen to be overly bureaucratic and effort should be concentrated on keeping goose populations under control.

H] Future structure and funding of monitoring. Yes; monitoring, such as conducting goose counts, must continue and be adequately funded.

J] Future delivery of population management and funding. Yes; as long as population management allows bag limits that effectively reduce and/or maintain realistic populations of geese which achieve real balance between conservation, other environmental considerations and allowing crofters and farmers to feed and produce livestock.

K] Structures and governance of goose conservation and management at national and regional levels. The experience of local goose management groups show present structures, i.e. relationship between local and national, is not working and is in need of redesign. We have noted frustration held by local groups with the national body which is seen to operate in a top down manner, and views are widely held that the practicalities of goose management on the ground are not appreciated by them.

5] Which of these policy areas did you or your organisation seek to influence?

The SCF, over many years has sought to influence many policy areas, particularly in relation to numbers of greylags and barnacles in Uist, to little avail. Views expressed at national level, letters, and a public petition have had little impact on the national body.

6] Have you and your organisation seen the latest version of the SNH 2016-17 Review (presented to the most recent meeting of NGMRG and sent out with the agenda for that meeting)?

Yes.

7] Are you aware of how the representations from you and your organisation have been incorporated into the ultimate draft?

No; ending of funded schemes in some locations while maintaining very expensive schemes in others are not equitable. Areas where there have been adaptive management schemes are now expected to develop self-help approaches and these are likely to be unsustainable if this means self-funded. If government expects local groups to pay for goose management themselves then protection of greylags at least should be lifted and the general licence applied all year round.

8] What other goose policy issues did you identify?

Sale of goose meat such as was the case in Uist should be widened to include other areas. There are presently no goose management schemes operating in Lewis and Harris, the Uists, or in Tiree and Coll due to ending of the adaptive management schemes. Numbers of geese recorded in Uist have increased from lower numbers achieved during the scheme. This trend can only be expected to continue as we await the September 2017 count results.

9] Do you believe the review process adequately reflects your concerns?

No.

10] Do you believe the review process was modified on the basis of input from you and your organisation?

The make-up, operation and how national and local groups relate to each other require fundamental restructuring. Changes which have taken place over recent years, such as aspects of land management within many island areas now being under community ownership, are not recognised at national level. The SCF recommends that a review is undertaken of the structure of future goose management in Scotland.

ANNEX 8: RESPONSE FROM SCOTTISH GOVERNMENT RURAL PAYMENT & INSPECTIONS DIRECTORATE (SGRPID)

1] Are you aware of the SNH 2016-17 Review of goose policy process?

Yes

2] Have you [or your organisation] had an opportunity to contribute to the review process?

Yes

3] If you contributed to this review process, did you do so directly to SNH or through the National Goose Management Review Group (NGMRG)/ Goose Scientific Advisory Group (GSAG)?

I have sat on NGMRG for the last 16 months or so while covering for my manager while he was on sick leave. I have contributed my thoughts through the NGMRG forum. I have also had discussions with Rae McKenzie direct as she has developed the review.

4] What areas of goose policy are a priority for you and your organisation?

A] Goose population monitoring- methodology and/or logistics. Important for highly protected species (barnacle / white front). Not important for greylags where focus is on population reduction.

B] Species specific management programmes. This is welcome next step in policy development. Grossly unfair that some farmers and crofters outwith Islay and Solway have high level of damage from Barnacle geese and very limited options to mitigate and minimise damage.

C] Habitat monitoring It's a legislative requirement for government on protected sites so not much choice. Should be low outwith these sites.

D] Assessment of impact on other species, land use and economic activity. This is an area that should be prioritised and focus effort to come up with a standard way of calculating agricultural damage that could be applied (per species) and working assumptions on impact of other species and activities. As Jack Fleming (RSPB Islay) always reminds us, this needs to be based on science. I think it could be developed in a cost efficient way centrally and then rolled out for use by all areas.

E] Linking management strategies to objective intervention indicators. Yes - management strategies should be available once goose density hits a certain threshold.

F] Cost benefit of non-lethal scaring or provision of sacrifice crops. Low - we have ruled this out for Islay through long term plan and think this could be extrapolated to other areas.

G] Cost benefit of adaptive management. Hobby horse - sorry! The only adaptive management is the project in Islay. The greylag pilots are population reduction programs. Medium for Islay - cost of running the adaptive management not that high but it would be useful to examine value for money compared to no intervention (but not until the population is reduced).

H] Future structure and funding of monitoring. Monitoring will be critical to species specific management plans where the species is highly protected. Resourcing the funding of this work will be a challenge under SNH current budgetary pressures.

J] Future delivery of population management and funding. While we remain in the EC and assuming we roll over all existing regulations when we leave, it is safe to assume that there will be obligations on government to manage habitats for protected species of geese. Where they cause agricultural conflicts than species specific management plans need to be in place agreeing target population and appropriate management funds to meet these requirements.

K] Structures and governance of goose conservation and management at national and regional levels. Medium - Delivery of goose management devolved to a local stakeholder level has (in the 12 years I have been involved) done reasonably well at reducing the conflict between government and stakeholders. It does take more time and resource to deliver than a standard payment rate applied across the country (like SG does with agri-environment schemes). The interaction between local and national forums could be reviewed to try and improve performance. My observation of National Group is that it is now an advisory body only and needs its role redefined to be effective.

5] Which of these policy areas did you or your organisation seek to influence?

Species specific management programmes; Linking management strategies to objective intervention indicators; Future delivery of population management and funding.

6] Have you and your organisation seen the latest version of the SNH 2016-17 Review (presented to the upcoming meeting of SGMRG sent out with the agenda for that meeting)?

Yes

7] Are you aware of how the representations from you and your organisation have been incorporated into the ultimate draft?

Yes

8] What other goose policy issues did you identify?

Frustrated that greylag management awaits review of the pilots and perhaps could have been incorporated in to this policy review. The cliff edge that Uist and Tiree groups talk about is down to waiting for the pilot review to take place but not providing any sort of continued funding until review is complete and conclusions delivered.

The author knows my views on future of greylags and has included these where possible.

9] Do you believe the review process adequately reflects your concerns?

Yes re Barnacle and White fronts. No for greylags.

10] Do you believe the review process was modified on the basis of input from you and your organisation?

Yes.

11] Do you have other comments or observations about the review process and your engagement in this?

I understand that this is light touch internal review and the work done reflects this. I have had good engagement because of my temporary role on national group and my existing working relationship with the author.

The lack of engagement with local groups will have weakened the process. Not all groups have strong national reps who attend national group regularly and they will have missed out because of this.

ANNEX 9: RESPONSE FROM SCOTTISH LAND & ESTATES (SLE)

1] Are you aware of the SNH 2016-17 Review of goose policy process?

Yes

2] Have you [or your organisation] had an opportunity to contribute to the review process?

Yes

3] If you contributed to this review process, did you do so directly to SNH or through the National Goose Management Review Group (NGMRG)/ Goose Scientific Advisory Group (GSAG)?

NGMRG

4] What areas of goose policy are a priority for you and your organisation?

~~A] Goose population monitoring methodology and/or logistics~~

B] Species specific management programmes

~~C] Habitat monitoring~~

D] Assessment of impact on other species, land use and economic activity

E] Linking management strategies to objective intervention indicators

~~F] Cost benefit of non-lethal scaring or provision of sacrifice crops~~

G] Cost benefit of adaptive management

~~H] Future structure and funding of monitoring~~

J] Future delivery of population management and funding.

G] Structures and governance of goose conservation and management at national and regional levels.

5] Which of these policy areas did you or your organisation seek to influence?

All of the highlighted above

6] Have you and your organisation seen the latest version of the SNH 2016-17 Review (presented to the upcoming meeting of SGMRG sent out with the agenda for that meeting)?

Yes

7] Are you aware of how the representations from you and your organisation have been incorporated into the ultimate draft?

Yes

8] What other goose policy issues did you identify?

N/A

9] Do you believe the review process adequately reflects your concerns?

Yes

10] Do you believe the review process was modified on the basis of input from you and your organisation?

Yes

11] Do you have other comments or observations about the review process and your engagement in this?

None

ANNEX 10: RESPONSE FROM SOLWAY LOCAL GOOSE GROUP

1] Are you aware of the SNH 2016-17 Review of goose policy process?

Yes.

2] Have you [or your organisation] had an opportunity to contribute to the review process?

Yes.

3] If you contributed to this review process, did you do so directly to SNH or through the National Goose Management Review Group (NGMRG)/ Goose Scientific Advisory Group (GSAG)?

Comments were fed through the local SNH group.

4] What areas of goose policy are a priority for you and your organisation?

A] Goose population monitoring- methodology and/or logistics. Yes.

B] Species specific management programmes. Yes.

C] Habitat monitoring. No.

D] Assessment of impact on other species, land use and economic activity. Yes - high levels of economic impact occur

E] Linking management strategies to objective intervention indicators. No.

F] Cost benefit of non-lethal scaring or provision of sacrifice crops. Not applicable.

G] Cost benefit of adaptive management. Not applicable.

H] Future structure and funding of monitoring. Yes – high priority.

J] Future delivery of population management and funding. No.

K] Structures and governance of goose conservation and management at national and regional levels. No comment.

5] Which of these policy areas did you or your organisation seek to influence?

5h - It is important to maintain the structures and funding of the present goose management scheme.

6] Have you and your organisation seen the latest version of the SNH 2016-17 Review (presented to the most recent meeting of NGMRG and sent out with the agenda for that meeting)?

No.

7] Are you aware of how the representations from you and your organisation have been incorporated into the ultimate draft?

No.

8] What other goose policy issues did you identify?

An increase in the management area may be required to reflect increases in population pressure.

9] Do you believe the review process adequately reflects your concerns?

Yes.

10] Do you believe the review process was modified on the basis of input from you and your organisation?

No comment.

ANNEX 11: RESPONSE FROM ISLAY LOCAL GOOSE GROUP

1] Are you aware of the SNH 2016-17 Review of goose policy process?

Yes; Members of the group were aware of the review in the later stages and had sight of drafts.

2] Have you [or your organisation] had an opportunity to contribute to the review process?

No; the Islay group were briefed on the process in February 2017 but there was no coordinated or structured consultation. The Chair of the group made efforts to represent group views at the NGMRG.

3] If you contributed to this review process, did you do so directly to SNH or through the National Goose Management Review Group (NGMRG)/ Goose Scientific Advisory Group (GSAG)?

No; it was unclear to the group how the SNH policy review was to be progressed and therefore no coordinated discussion at the local group took place and no formal representations were made. Andrew Bauer [NFUS Representative NGMRG] did provide e-mail snapshots of draft papers and briefed members; however that communication link did not develop a pathway for the local group to input to the review process.

4] What areas of goose policy are a priority for you and your organisation?

A] Goose population monitoring- methodology and/or logistics. Yes; Monitoring on Islay is of a high standard however there is an inadequate understanding of the movement of Barnacle Goose movements between islands and further work is a priority. At a wider Scotland level population monitoring should be at a higher standard and requires new funding.

B] Species specific management programmes. Yes; single species plans are a positive development but should take account of the Islay 10 year plan.

C] Habitat monitoring. Yes; the RSPB representative on the group identified the monitoring of island habitats and other species as important baseline information which should also be part of the evidence base to guide management intervention.

D] Assessment of impact on other species, land use and economic activity. Yes; assessment of the impact including quantifying the economic pressures on agriculture is a key area. The concept and calculation of income foregone should be reviewed.

E] Linking management strategies to objective intervention indicators. Yes; however identifying objective indicators for intervention should be part of the single species plans; [point 4b]

F] Cost benefit of non-lethal scaring or provision of sacrifice crops. No; not a cost effective approach.

G] Cost benefit of adaptive management. No; not an appropriate tool when reduction in numbers is a key priority. The proposed levels of bureaucracy are un-workable.

H] Future structure and funding of monitoring. Yes; managing growing populations of Barnacle Geese is a significant challenge. Flock movements across islands will require higher levels of understanding and monitoring and any intervention will have to be coordinated across islands. This challenge will need a new approach to improve

monitoring, communication and coordinate a coherent management approach. Local groups must be at the centre of this process and receive the flexibility and resources to deliver on the ground. Clearly that can only be achieved if appropriate funding is available.

J] Future delivery of population management and funding. Yes; The Islay ten year plan is a model that provides the required continuity of approach and funding to develop both effective and sustainable goose management systems. With funding of the Islay plan only projected to 2021 and other areas and islands seeking support there must be a commitment to long term financial support which ensures the viability of goose management in the context of the wider economy and community.

K] Structures and governance of goose conservation and management at national and regional levels. Yes; the activity of local groups is fundamental to effective management; this role has been compromised by their exclusion from decision making processes and a hierarchy which has failed to value local initiative and intelligence. Islay goose group demonstrates the power of all local interests coming together to provide a cohesive approach to goose management and conservation. It is important future delivery utilises this model.

5] Which of these policy areas did you or your organisation seek to influence?

No; the group made no formal representation although the Chair channelled the views of the Islay group direct to SNH. The comments in this report however capture the views of the group.

6] Have you and your organisation seen the latest version of the SNH 2016-17 Review (presented to the most recent meeting of NGMRG and sent out with the agenda for that meeting)?

Yes.

7] Are you aware of how the representations from you and your organisation have been incorporated into the ultimate draft?

NA

8] What other goose policy issues did you identify?

There should be a review of bag limits [protected species] recognising the population changes over recent years and the reproductive performance of species groups. The review should include the science behind calculations and recognise the over precautionary approach which has been applied. There should also be recognition of the challenges of achieving the population targets.

Local groups should be empowered to implement agreed long term strategies with the flexibility and appropriate resources provided from the centre.

The NGMRG should adopt a new culture and reform to provide an effective two way flow of information between local groups, SNH and Government. A more open and collaborative approach requires local groups to be represented on the new NGMRG including farmers and crofters who are directly impacted by geese.

Future policy development should be supported by consultation meetings on the ground involving local goose groups.

Greylag geese remain a significant challenge on Islay; management should be part of a national long term strategy with local groups taking the lead in delivery. The adaptive management pilots are not an appropriate approach where significant reductions in population are required.

9] Do you believe the review process adequately reflects your concerns?

No; Concerns remain that the policy framework does not commit to long term local plans, that there is no clear indication that local groups will receive the autonomy, flexibility or funding to operate effectively.

10] Do you believe the review process was modified on the basis of input from you and your organisation?

No.

ANNEX 12: RESPONSE FROM TIREE & COLL LOCAL GOOSE GROUP

Teleconference 16th August 2017; Goose Policy Review – Survey of stakeholder views, Meeting Summary

1] Are you aware of the SNH 2016-17 Review of goose policy process?

No, the group had no direct information although the RSPB did provide some information.

2] Have you [or your organisation] had an opportunity to contribute to the review process?

No, there was no structured consultation process and no formal response from the group. The normal activity of the goose group did generate a flow of comments re the impact of geese on the islands, the environment and the community. Views were directed to SNH and NFUS.

3] If you contributed to this review process, did you do so directly to SNH or through the National Goose Management Review Group (NGMRG)/ Goose Scientific Advisory Group (GSAG)?

Views were directed through NFUS.

4] What areas of goose policy are a priority for you and your organisation?

A] Goose population monitoring- methodology and/or logistics. Yes monitoring is a priority; at present the RSPB on Tiree monitors goose populations and breeding success and provides good baseline data. That RSPB data bank is important to SNH and determines management priorities and levels of licencing. The situation on Coll may require more effort/investment.

B] Species specific management programmes. Yes; [high level priority] the development of single species management plans have the potential not only to create a comprehensive species management plan but also fix a consistent approach across the full range of each species. The management of Barnacle geese is a major challenge, it is vital that there is parity of intervention and support.

C] Habitat monitoring. Yes; habitat monitoring is a high priority and should be a key part of the baseline data that determines management policy. The decline and loss of cropping and reseeded has reduced or broken the habitat mosaics which typified the Tiree landscape. The loss of diversity has caused a decline in corn bunting, linnet and twite.

D] Assessment of impact on other species, land use and economic activity. Yes; the decline in bird species [4c] are clear indicators of a loss of diversity. The change in land use also impacts on economic activity and the sustainability of businesses. There must be efforts to quantify the costs of changes in farming practice not only the loss of cropping and reseeded but the requirement to cope with goose population pressures; the output of grazings and the problems of conserving grass which has been flattened by bird activity. User friendly formulae to quantify goose impacts in terms of livestock units or ewe equivalents may contribute to decision making.

E] Linking management strategies to objective intervention indicators. Yes; High priority as part of single species management plans and a key to consistent intervention and support across Scotland.

F] Cost benefit of non-lethal scaring or provision of sacrifice crops. No.

G] Cost benefit of adaptive management. Yes a priority for Greylag management; the pilots have made progress but need further development. The pilot seed corn funding has been an important catalyst delivering significant benefits; however ending the pilot with no future arrangements or funding in place risks a collapse in effort as the tools required by the community to sustain population management are not in place.

H] Future structure and funding of monitoring. Not at present but positive picture is dependent on the RSPB effort.

J] Future delivery of population management and funding. Yes, high priority; the island communities are small and are operating in demanding situations with limits to their capacity to take on a heavy goose management roles. The present arrangements on Tiree rely on the estate, their shooting parties and the activity of the professional keeper in the off-season as a marksman charged with delivering defined bags to meet quota targets. Structures are required to enable the community to employ their own marksman to ensure that management is sustainable and any conflict of interest can be avoided. Coll depends on just two local marksmen to carry a significant load; additional help is required through funding an additional marksman. Shooting rights across the island of Tiree are unclear and should be clarified to ensure that crofters and farmers have the right to intervene.

K] Structures and governance of goose conservation and management at national and regional levels. Yes, the local group is undervalued and should have a more significant voice in policy development and receive appropriate resources to deliver on the ground. Resources should be determined by the single species management plan linked to populations and their impact. The strength of the group in Tiree and Coll is underpinned by its inclusive membership with a common commitment to sustainable goose management. The structure and terms of reference of the NGMRG should be reviewed. The present structures do not allow a decision making role for NGMRG which limits its capability to support or respond to local groups. Its present structure has not been successful in creating two way information flows. The cessation of the adaptive management pilot without any successor scheme is an example of an area where the NMRG might have been expected to intervene. In-consistent approaches to Barnacle goose management across groups is another policy area where the NGMRG might have intervened.

5] Which of these policy areas did you or your organisation seek to influence?

Yes; the level of goose impact over the islands. The importance of Greylag geese; the need for continuity of action and funding when the adaptive management pilot ended. The significance of Barnacle populations and the urgency of implementing a consistent approach and support across all the islands.

6] Have you and your organisation seen the latest version of the SNH 2016-17 Review (presented to the most recent meeting of NGMRG and sent out with the agenda for that meeting)?

Yes some members have seen the draft but only in recent weeks.

7] Are you aware of how the representations from you and your organisation have been incorporated into the ultimate draft?

The commitment to address in-equality in approach is positive. The single species plan has the potential to deliver equality of status across groups. In contrast the section on training goose behaviours appears to be of little value.

8] What other goose policy issues did you identify?

Oiling eggs is a useful tool in managing numbers; this should be further developed.

The Stress of crofting or farming under the pressure of large goose populations should be factored into intervention strategies and delivery. The constant pressure is amplified with scattered land parcels being typical of tenure. Professional marksman support is required with appropriate funding to relieve some of these pressures.

The local group requires the support and flexibility to deliver management plans for Greylag and Barnacle goose populations.

Funding is key to address growing population pressures and to deliver the parity of management and support outlined in the single species concept.

9] Do you believe the review process adequately reflects your concerns?

Cost cutting and a move to self-help is not appropriate at this stage and has the potential to be destructive. Goose populations must be stabilised at a sustainable level before self-help approaches are developed and a tool box should be available to local groups to allow them to intervene appropriately.

10] Do you believe the review process was modified on the basis of input from you and your organisation?

It would have been helpful if the outcomes of the adaptive management pilot could have been included within the policy review.

ANNEX 13: RESPONSE FROM UISTS LOCAL GOOSE GROUP

Teleconference - Uists and Lewis and Harris Goose Groups 9th August 2017
Goose Policy Survey- summary of group response.

1] Are you aware of the SNH 2016-17 Review of goose policy process?

No; in the recent past some members of the group had become aware. One member had received a draft copy that was designated –not for circulation.

2] Have you [or your organisation] had an opportunity to contribute to the review process?

No formal or structured opportunity.

3] If you contributed to this review process, did you do so directly to SNH or through the National Goose Management Review Group (NGMRG)/ Goose Scientific Advisory Group (GSAG)?

The groups, as part of their normal activity, had submitted policy views direct to Scottish Government and to SNH. Their chair had been active on behalf of the groups.

4] What areas of goose policy are a priority for you and your organisation?

A] Goose population monitoring- methodology and/or logistics. Yes; Barnacle goose population data and inter island movements are key to sustainable management.

B] Species specific management programmes. Yes; the concept is an important building block for the future, the delivery of common intervention and management regimes across the range of any species is a vital step towards parity of support. There are concerns however as to how plans will be delivered when different species are exploiting the same feeding grounds. The group welcomes the commitment to consult at local level.

C] Habitat monitoring. Not a priority.

D] Assessment of impact on other species, land use and economic activity. Yes; assessing the impact on land use and the costs of supporting goose populations is a vital piece of baseline management data. Crofting land use management is different from the agricultural practice in other regions. The grazing management and maintenance of species rich machair has not been factored into existing costings. Future assessment systems should be sensitive but also user-friendly.

E] Linking management strategies to objective intervention indicators. Yes; this should be part of the single species management plan. The indicators should be easily interpreted by non-specialist observers.

F] Cost benefit of non-lethal scaring or provision of sacrifice crops. No; not a viable option.

G] Cost benefit of adaptive management. No; the present approach is too bureaucratic and is not an appropriate tool where population reduction is required.

H] Future structure and funding of monitoring. Not a general priority but may be significant in some local areas.

J] Future delivery of population management and funding. Yes- top priority; Bag limits [protected species] should be reviewed taking into account the reproductive performance of the birds. Local groups should be empowered to manage intervention on the ground and funded according to species management plans which will require the redistribution of budgets. The management of Greylag geese is a high priority and requires a new approach. With large areas to manage external funding or resources are required to achieve sustainable population levels.

K] Structures and governance of goose conservation and management at national and regional levels. Increasing the input of local groups into policy development and devolving responsibility for management to local groups should be at the heart of future plans. If appropriate funding is not secured there should be de-regulation to allow groups to operate more effectively. There must be a long-term commitment to the sale of goose meat in mainland markets.

5] Which of these policy areas did you or your organisation seek to influence?

The group have made representations on the sale of goose meat, the future control of greylag geese and over recent years similar concerns over increasing numbers of Barnacle geese. [30 letters and petition]

6] Have you and your organisation seen the latest version of the SNH 2016-17 Review (presented to the most recent meeting of NGMRG and sent out with the agenda for that meeting)?

No.

7] Are you aware of how the representations from you and your organisation have been incorporated into the ultimate draft?

On reading the policy review summary the group support the commitment to equality of approach across Scotland which must mean equality of funding; the mention of establishing the long term sale of goose meat is also positive; however the group are concerned that a key priority, the control of growing greylag populations is not addressed in a meaningful way and that the self-help concept should not be a pathway to reduced support.

The impression is that the policy approach may be weak and risk averse. Concerns were also expressed that the local groups had not been involved in developing the section relating to Barnacle geese in the Hebrides.

8] What other goose policy issues did you identify?

The end of the adaptive management pilot without a successor plan or any future commitment to funding has placed the islands on a cliff-edge.

The basic tools required for the control of Greylag populations have not been provided or built into the policy plan i.e. a commitment to an immediate opening up of long term markets for goose meat and the funding for culling over extensive areas.

There has been a failure to recognise local issues and the unique challenges faced in the Outer Hebrides environment.

The need to review the basis of bag limits and to factor in seasonal variations in breeding performance. The present calculations are too precautionary and have been a vehicle that has driven population growth.

9] Do you believe the review process adequately reflects your concerns?

No.

10] Do you believe the review process was modified on the basis of input from you and your organisation?

There has been an ongoing communication deficit which has isolated local groups from decision making. The lack of a viable consultation process over the development of the goose policy review is a symptom of that disconnection. The NGMRG in its present form does not provide a bridge between local groups and the development and implementation of policy at the centre. Its present membership fails to recognise the role of Community owned Estates.

The NGMRG should be restructured to create a new start. Local group representatives should be involved in the re-vitalised body

ANNEX 14: RESPONSE FROM LEWIS & HARRIS LOCAL GOOSE GROUP

1] Are you aware of the SNH 2016-17 Review of goose policy process?

No.

2] Have you [or your organisation] had an opportunity to contribute to the review process?

No.

3] If you contributed to this review process, did you do so directly to SNH or through the National Goose Management Review Group (NGMRG)/ Goose Scientific Advisory Group (GSAG)?

NA

4] What areas of goose policy are a priority for you and your organisation?

A] Goose population monitoring- methodology and/or logistics.

B] Species specific management programmes.

C] Habitat monitoring.

D] Assessment of impact on other species, land use and economic activity.

E] Linking management strategies to objective intervention indicators.

F] Cost benefit of non-lethal scaring or provision of sacrifice crops.

G] Cost benefit of adaptive management.

H] Future structure and funding of monitoring.

J] Future delivery of population management and funding.

K] Structures and governance of goose conservation and management at national and regional levels.

All are priorities.

5] Which of these policy areas did you or your organisation seek to influence?

NA

6] Have you and your organisation seen the latest version of the SNH 2016-17 Review (presented to the most recent meeting of NGMRG and sent out with the agenda for that meeting)?

No.

7] Are you aware of how the representations from you and your organisation have been incorporated into the ultimate draft?

NA

8] What other goose policy issues did you identify?

NA

9] Do you believe the review process adequately reflects your concerns?

NA

10] Do you believe the review process was modified on the basis of input from you and your organisation?

The group requests a report of the outputs of the independent review process and would like a discussion with SNH on the level of engagement with the Lewis and Harris Group over the development of the Policy Review.

ANNEX 15: RESPONSE FROM ORKNEY LOCAL GOOSE GROUP

Background- although some comments were offered regarding the Walls goose management scheme the main focus of the group is the resident population of grey lag geese which has become a significant issue since the 1980's impacting heavily on agricultural land and crop management

1] Are you aware of the SNH 2016-17 Review of goose policy process?

Yes information was received from Andrew Bauer however it was unclear what action was required. There was no formal consultation mapped out.

2] Have you [or your organisation] had an opportunity to contribute to the review process?

No, with no formal pathway for comments the group did not feed in views.

3] If you contributed to this review process, did you do so directly to SNH or through the National Goose Management Review Group (NGMRG)/ Goose Scientific Advisory Group (GSAG)?

NA

4] What areas of goose policy are a priority for you and your organisation?

A] Goose population monitoring- methodology and/or logistics. Counting and data collection appears to be adequate in Orkney for both resident and migratory populations; however there are issues regarding the summer counting process of resident birds. With counts of resident birds being operated in the last week of August there is a requirement to suspend the [adaptive management pilot] control programme. That pause in activity is in conflict with the aims of the pilot and has made achieving the cull target significantly more challenging. A different approach is required.

B] Species specific management programmes. The population of Barnacle geese on Hoy will be impacted by the proposed single species management plans. The population of migratory Barnacle geese appears to be stable and the management area over three farm holdings has been a success. It is hoped that the single species management programme will have no adverse effect on this scheme and that funding will continue.

C] Habitat monitoring. There is anecdotal evidence of habitat changes caused by the population of resident grey lag geese. This is of societal significance and is part of the evidence base which should inform control programmes. New funding is required to identify and quantify habitat impacts.

D] Assessment of impact on other species, land use and economic activity. There are significant changes being forced on farmers and crofters- the reduction or cessation of cereal production and problems with silage making are a cost to individuals and the island economy. Calculations of goose damage to grazing may be quantified on the basis of grazing intakes [1kg fresh matter/day] multiplied by the population level; at present that cost is between £850,000 and £1m. Behind these landscape level changes there are concerns over [goose] faecal pathogens contaminating both water supplies and silage crops. Initial research work has demonstrated that geese and cattle strains of cryptosporidium are similar. Scottish water have identified cryptosporidium in water supplies over the winter period when cattle are housed.

E] Linking management strategies to objective intervention indicators. Not a priority.

F] Cost benefit of non-lethal scaring or provision of sacrifice crops. Not a priority – not applicable.

G] Cost benefit of adaptive management. Yes, high priority; the group are disappointed that the adaptive management pilot assessment did not form part of the goose policy review. The management of quarry species is a key part of goose management; there are concerns that the prioritisation of the management of protected species has compromised action to address the impact of grey lag geese. The group believe that the adaptive management pilot did deliver significant benefits at low cost. In reality the major cost factor was administration and counting with only [approximately] 25% of the budget being used to support control activity. The pilot failed to deliver the targeted population reduction; however when viewed against the trajectory of population growth stabilising the population at 24,000 approximately is an achievement. A future population control programme must be implemented to immediately succeed the end of the adaptive management pilot. The successor programme should use a suite of diverse control measures to support shooting. After initial work on Orkney, oiling eggs appears to be a valuable control tool; the use of expert marksman to take out one, of a pair of geese, at the start of the breeding season is an option which should be explored. The corralling and dispatch of juveniles may also have a role but requires to be managed by professionals. Future control can be supported by a commitment to the wider sale of goose meat and costs may also be supported by an extension of the season when shooting parties may operate. The extension of the grey lag goose general licence into July and August underpins that approach. In Orkney the diverse patch work of land ownership can hamper control activity; supporting the creation of collaborative control groups might facilitate appropriate and effective control activity especially where professional marksman are employed. There is a significant burden on many farmers and professional support will be required to deliver appropriate and effective control.

H] Future structure and funding of monitoring. No.

J] Future delivery of population management and funding. Yes - the development of goose meat markets out-with Orkney.

K] Structures and governance of goose conservation and management at national and regional levels. At a local level the group has been a success and developed a positive collaborative approach with local SNH officers. That should be the foundation of future delivery. At a national level grey lag issues should be a higher priority and structures, policy development and the allocation of resources should reflect this.

5] Which of these policy areas did you or your organisation seek to influence?

The group has fed in its view of the adaptive management pilot. The need for flexibility and a more diverse approach to control as outlined above

6] Have you and your organisation seen the latest version of the SNH 2016-17 Review (presented to the most recent meeting of NGMRG and sent out with the agenda for that meeting)?

On the basis of the summary published in the Goose Policy Review Report page 27 - The group welcomes the action point on the sale of goose meat. There are significant concerns however, that the adaptive management pilot has ended without a successor scheme or interim scheme in place. There are risks that gains secured over the period of the pilot will be lost. The group has concerns regarding the emphasis on budget control and self-help

outlined in the goose policy review. Local goose groups should have both an effective control programme in place underpinned by appropriate resources and sustainable goose populations should be achieved before self-help and budget control become a priority.

The use of the SRDP to plug funding gaps is not supported; the demands on that budget and its competitive nature mean that there will be significant losers if rural development funding becomes a vehicle for goose management. The parity of approach outlined within the policy review will be broken.

The terms of reference and membership of the NGMRG should be reviewed. The terms of reference should reflect the importance of quarry species. The Orkney group should have direct representation on the new NGMRG

7] Are you aware of how the representations from you and your organisation have been incorporated into the ultimate draft?

NA

8] What other goose policy issues did you identify?

Public Health and Animal Health appear to be significant risks associated with goose populations. Further research and long term monitoring is required.

9] Do you believe the review process adequately reflects your concerns?

No; the exclusion of the adaptive management pilot assessment from the goose policy review has reduced its value and created fears that the management of quarry species is a low priority. The summary of the goose policy review gives strength to that view; it appears heavily weighted towards protected species and fairly weak in its posture towards future management. The failure of the authorities to introduce a successor scheme, or interim scheme, to follow the end of the adaptive management pilot is high risk and has the potential to undermine the progress secured over the period of the pilot.

10] Do you believe the review process was modified on the basis of input from you and your organisation?

No further comment.

ANNEX 16: RESPONSE FROM SKYE NFUS

1] Are you aware of the SNH 2016-17 Review of goose policy process?

Yes; Aware through briefings circulated by NFUS but no direct contact from SNH.

2] Have you [or your organisation] had an opportunity to contribute to the review process?

No.

3] If you contributed to this review process, did you do so directly to SNH or through the National Goose Management Review Group (NGMRG)/ Goose Scientific Advisory Group (GSAG)?

Comments on goose issues have been provided to NFUS but no formal response to the SNH Policy Review was made.

4] What areas of goose policy are a priority for you and your organisation?

A] Goose population monitoring- methodology and/or logistics. No.

B] Species specific management programmes. No.

C] Habitat monitoring. No.

D] Assessment of impact on other species, land use and economic activity. Yes; the resident goose population is selectively destroying the areas of improved grassland. The issue is a significant problem forcing the community to commit time and resources to scaring and shooting. At a wider economic level there is increased spending on feed and silage to replace lost production.

E] Linking management strategies to objective intervention indicators. No.

F] Cost benefit of non-lethal scaring or provision of sacrifice crops. No.

G] Cost benefit of adaptive management. Yes.

H] Future structure and funding of monitoring. Yes.

J] Future delivery of population management and funding. Yes; the adaptive management pilot has not been adequately funded on Harris and Lewis, the community has raised funds locally to support the local scheme. The community is also very reliant on landowner activity to deliver management objectives, an approach that may not be sustainable in the long term, and may be subject to conflicts of interest. Uists; the goose population is a massive issue with numbers still increasing. The adaptive management pilot was not adequately funded and there was insufficient capacity within the islands to deliver the targeted reduction in bird numbers. The time commitment over a prolonged period, [often required at extreme times of day], to try and mitigate the losses on crofts has placed an intolerable strain on the community. These issues must be addressed by the review; clearly adequate funding of successor schemes and parity of support across the island and mainland goose areas are fundamental to a future approach

K] Structures and governance of goose conservation and management at national and regional levels. Yes.

5] Which of these policy areas did you or your organisation seek to influence?

No direct input to the review; however the funding and support of local goose management were issues fed into NFUS.

6] Have you and your organisation seen the latest version of the SNH 2016-17 Review (presented to the most recent meeting of NGMRG and sent out with the agenda for that meeting)?

No.

7] Are you aware of how the representations from you and your organisation have been incorporated into the ultimate draft?

NA

8] What other goose policy issues did you identify?

The sale of goose meat is a key issue. The extension of the sale of goose meat to mainland markets is important and a real opportunity. There should be help in setting up and developing a marketing group. The wider sale of goose meat has the potential to create an income stream to support those that at present carry the losses of goose grazing and the burden of population management; it is a first step towards a self-sustaining solution

9] Do you believe the review process adequately reflects your concerns?

No.

10] Do you believe the review process was modified on the basis of input from you and your organisation?

No.

ANNEX 17: RESPONSE FROM GILL HARTLEY (SASA)

1] Are you aware of the SNH 2016-17 Review of goose policy process?

Yes

2] Have you [or your organisation] had an opportunity to contribute to the review process?

Yes

3] If you contributed to this review process, did you do so directly to SNH or through the National Goose Management Review Group (NGMRG)/ Goose Scientific Advisory Group (GSAG)?

Through the NGMRG but as chair of GSAG. The response was a joint response from Matt Ellis (BASC) and myself. Christine Wernham and Liz Humphreys (BTO) were not able to respond by my deadline (I had to impose since I was away and Rae had an unmovable deadline for responses), so I asked BTO to respond directly to Rae, but the contribution was theoretically from GSAG. SNH (also members of GSAG) said they would respond directly within SNH, i.e. internally rather than via GSAG.

4] What areas of goose policy are a priority for you and your organisation?

A] Goose population monitoring- methodology and/or logistics. High priority.

B] Species specific management programmes. High priority.

C] Habitat monitoring. Agricultural habitats, high; wild habitats, low to medium.

D] Assessment of impact on other species, land use and economic activity. High, especially goose interactions, how geese respond to land use changes and impacts on agriculture.

E] Linking management strategies to objective intervention indicators. Medium to High (SNH now taken responsibility for this, but of interest to group).

F] Cost benefit of non-lethal scaring or provision of sacrifice crops. High.

G] Cost benefit of adaptive management. Medium to High (work undertaken by the Adaptive Management group, but of interest to group).

H] Future structure and funding of monitoring. High.

J] Future delivery of population management and funding. Management = high; funding = medium/low (SG policy/SNH role, but obviously has impacts).

K] Structures and governance of goose conservation and management at national and regional levels. Medium to high. Not really a role for GSAG, but clearly has significant implications.

5] Which of these policy areas did you or your organisation seek to influence?

A, B, C, D, E, F, G, H.

H (funding), J & particularly K are outside GSAG's remit.

6] Have you and your organisation seen the latest version of the SNH 2016-17 Review (presented to the most recent meeting of NGMRG and sent out with the agenda for that meeting)?

Yes have seen it, but have not commented, since it is now 'fait accompli'. However, some elements will be discussed at the next GSAG meeting.

7] Are you aware of how the representations from you and your organisation have been incorporated into the ultimate draft?

Yes. There were aspects in the latest final draft that I was not aware of and that have implications for GSAG.

8] What other goose policy issues did you identify?

The report makes clear that funds are restricted and likely to decrease. Bearing this in mind

The species action plans seem to suggest there should be a consistent policy for each species irrespective of the range of locations where a particular goose species is found, which could have major cost implications, particularly when considering Islay's management of the Greenland barnacle goose vs other islands. Applying this management scheme across all areas with GL barnacle goose conflict would probably be prohibitively expensive. The Islay Goose Management Plan is also a 10 year plan and we're entering year 4, so there is still another National Goose Policy Review to take place before the plan ends, and the full implications of the work understood. Furthermore, land quality, land use, agricultural systems, weather patterns, human resources, etc. all vary from location to location (this is really only recognised in 3 paragraph of 5.1.2 when discussing 'calculating economic losses'), so a "one size fits all" approach might be inappropriate for a species across its Scottish range? For some species this may be possible (Canada geese), but for other species, more work is probably needed (extending beyond the current review period?) before it would be realistic to commit to a common policy across a species, unless the species action plan takes account of this variation.

Section 8 makes much of the fact that goose counts are in part conducted by volunteers and 'in a piecemeal fashion'. While there may be scope to review methods, for some goose species we have better quality count data, over a longer time period, than we have for many other species. Volunteer networks are important and seem to work well if managed properly (BTO may have much to say about this!). SNH actually compile all the count data from schemes once or twice a year, so there is central point of contact and collation (Simon Cohen). The review is a little vague about what is needed but it sounds costly, and if funds are limited, is there a risk we end up paying for a different approach that gives no better or more reliable data than we currently have?

9] Do you believe the review process adequately reflects your concerns?

Mostly; see above.

10] Do you believe the review process was modified on the basis of input from you and your organisation?

Yes, in parts.

11] Do you have other comments or observations about the review process and your engagement in this?

Not really. More time to review the first draft would have been useful, but then more time is always desirable!

ANNEX 18: RESPONSE FROM ALISON GRAY, SNH ISLAY

Additional note which accompanied the questionnaire: *“We appreciate that you work for SNH but you are nevertheless a stakeholder who has been consulted by the author of the review as part of the review process - and we are keen that we ensure that all involved get an opportunity to make any comments. The questions below are primarily written with external stakeholders in mind so it may be that you yourself focus more on the questions from [5] onwards.”*

1] Are you aware of the SNH 2016-17 Review of goose policy process?

2] Have you [or your organisation] had an opportunity to contribute to the review process?

3] If you contributed to this review process, did you do so directly to SNH or through the National Goose Management Review Group (NGMRG)/ Goose Scientific Advisory Group (GSAG)?

4] What areas of goose policy are a priority for you and your organisation?

A] Goose population monitoring- methodology and/or logistics

B] Species specific management programmes

C] Habitat monitoring

D] Assessment of impact on other species, land use and economic activity

E] Linking management strategies to objective intervention indicators

F] Cost benefit of non-lethal scaring or provision of sacrifice crops

G] Cost benefit of adaptive management

H] Future structure and funding of monitoring

J] Future delivery of population management and funding.

G] Structures and governance of goose conservation and management at national and regional levels.

5] Which of these policy areas did you or your organisation seek to influence?

SNH has a role in delivering all of the above policy areas.

6] Have you and your organisation seen the latest version of the SNH 2016-17 Review (presented to the most recent meeting of SGMRG and sent out with the agenda for that meeting)?

Yes, review document was made available.

7] Are you aware of how the representations from you and your organisation have been incorporated into the ultimate draft?

SNH has drafted the review document and there has been opportunity for staff to contribute. In reading the review document, staff input has been incorporated.

8] What other goose policy issues did you identify?

From my point of view, no other policy issues were identified.

9] Do you believe the review process adequately reflects your concerns?

No concerns raised.

10] Do you believe the review process was modified on the basis of input from you and your organisation?

No comment to make.

11] Do you have other comments or observations about the review process and your engagement in this?

No comment to make.

ANNEX 19: RESPONSE FROM GRAEME DALBY, SOLWAY BARNACLE GOOSE MANAGEMENT SCHEME ADMINISTRATOR

About me/my position/history

I am employed by SNH as the Rural Surveyor for Southern Scotland. A key part of that role is to administer the Solway Barnacle Goose Management Scheme (and have delivered this since 1995). The role also involves undertaking inspections in relation to licenses for shooting geese (both protected species and out of season licences for quarry species). In my personal life, I am a wildfowler and have shot on most large Scottish estuaries, inland in Scotland and at various locations in England. As such, my comments come from a range of stand-points.

Situation on Solway

Barnacle geese have historically been the main species of attention. Since the 1950s, numbers have shown a sustained increase. This has caused concern among land managers about further increases as there are already considerable local impacts, these can be intense and satellite locations where significant agricultural damage is occurring are developing e.g. Redkirk and Auchencairn. Pink footed geese and prior to that greylags been the focus for wildfowling on Solway, Auchencairn area and Wigtown Bay with significant visiting shooting interest supporting a modest scale of economic activity. This has reduced in recent years as geese have become more widespread. Wildlife watching has increasing over recent years with a particular focus on WWT at Caerlaverock and RSPB at Mersehead and Wigtown Bay.

Situation elsewhere in D&G with different species

Pinks – up to 60-100,000 on Upper Solway in recent years, plus Auchencairn, plus Wigtown, significant impact on winter cereals, difficult to predict numbers and spread (and therefore impact)

Greylag – (both feral and migratory) feral – increasing numbers, throughout Southern Scotland, impacts sometimes significant on agriculture close to many/most water bodies, licences issued in specific circumstances – but numbers still thought increasing, wild – much reduced on 1970s-90s, now not really any migration to D&G

Canadas – as feral greylag

White fronts – 200 in Loch Ken area, plus lower number at Stranraer Lochs reducing numbers– limited impacts – difficult to id cause of reduction but at Stranraer, shift from grass/cereal to maize may be cause/contributory factor

Brent – Stranraer/Loch Ryan – limited numbers, limited impacts

Input to review

I have had various discussions with Rae McKenzie during the development of the document, the outline of review was discussed at a couple of local goose group meetings and the topic has been raised during conversations with individual goose group members and individual farmers during the past year. I hosted a visit from Rae in March 2017 and provided key info for the Solway area based on early drafts.

Comments on review document

The document is timely in relation to barnacle geese on the Solway as numbers continue to increase and the population is spreading from traditional haunts onto new and isolated areas. That increase/expansion is obviously useful for geese, but is causing major concern for those farming interests currently affected (both inside and outside the current scheme area) and those starting to be affected (all outside the current scheme area). As such, there needs to be urgent consideration of what happens in the future, so as to allow time to implement actions properly.

The current range of options appear to be:

- full protection (no licences) and goose scheme,
- protection with limited licencing and goose scheme,
- protection with organised scaring and goose scheme
- protection with organised cull to reduce local population with parallel goose scheme
- in season shooting with out of season licences
- on general licence for crop protection purposes

Other options could be:

- changes in length of open season (including adding Sunday shooting)
- adding species to general licence (for whole year or shorter periods)

There seems to be little in the way of long-lasting effective, cost-effective scaring or impact reduction options. I do understand work is being done by SASA and GWCT on commercial-scale laser scarers as part of a LIFE project. I wonder if there is any further which could be done – but anything which is done must provide a cost-effective option for land managers. The issue of reduced farm labour reinforces this. Anything proposed also needs to be proportional, as there is always the suggestion that there should be more scaring – how much is required before considering other options may be a useful topic to consider and provide advice on.

Most folks accept that rarer species should receive a higher priority for action/funding, but the Solway situation with barnacle geese seems to be approaching the point of there being enough from a conservation point of view. That much increased population has developed under a funding package, but with tighter funding constraints, it may be withdrawn as numbers are no longer a conservation concern (but are a much bigger agricultural problem). This would cause significant difficulties among land managers (both practically and in terms of accepting such decisions)

Work to measure the levels of damage should be a nationally-co-ordinated/arranged matter and not just limited to Islay SRUC's farm at the Crichton on the outskirts of Dumfries would be well placed to act as a comparison for the Dumfries area.

The document notes (p8 final para) that 'There is no clear definition of at what point intervention is required and to what extent economic losses should be minimised'. An option may be to determine intervention levels on the [indicative/estimate] percent impact against rent for the land. The rent can be reasonably determined (providing there are assumptions made about what basis the land would be rented and a 'with geese' and 'without geese' rent could be reasonably indicated (albeit there would be some variation/range). It would then be a matter of identifying a level of different interventions. If someone reduced my salary by 1%, I may not notice, 5%, I would shout and start to react, 10% I would be striking and above that I would be homeless without other support.

There seems a general acceptance that impact is broadly in proportion to numbers. Certainly for the Solway, it would be useful to have range/limits for different management actions, e.g. numbers reach 100,000 – goes onto quarry list (note that is not a suggestion, just a type of situation).

Here on the Solway and elsewhere in D&G, there is the potential to grow goose-unfriendly crops, e.g. maize. Whilst in the barnacle goose areas, this happened a few years ago and has fallen back, it is a feature of the Stranraer area where concerns have been expressed that Greenland white-fronts are being compromised as previously grass areas are being used to grow maize, which then gets harvested (leaving no useful forage on the ground) and those areas are then used for overwintering cattle (again giving no useful winter forage for geese). The actual impacts of this have not been assessed but it may either affect birds badly, or they may just move to other grass fields.

The Solway limited the timeframe for the annual scheme – it is understood Islay did the same, but provided flexibility as to whether this was in the autumn or spring. The Solway scheme does it in spring as it allows scaring at the most crucial time of the year for farmers. It may also reduce fecundity so slowing or stopping the population growth (birds being thinner at breeding should produce fewer eggs and young, yet to be proven – goose numbers appear to have continued to increase without restriction). Such a process would be controllable (could be shorter or longer) and would be readily reversible if required.

I think it would be important to highlight in table on p10 and 11 that goose schemes have worked in resolving the conflict (but that they may have also made a longer term problem of more geese e.g. the Solway barnacle geese which are then more costly to deal with). I think it is probably also worth highlighting that virtually every farm has a labour shortage (so there is limited availability for scaring) and that there is increasing sensitivities on folks shooting geese (we have had a criminal damage case related to the exercising of a licence).

Alternative funding – a number of affected farmers on the Solway have suggested that WWT and RSPB could help fund goose schemes.

Para 6.2 Flyway plans – useful idea. There is already one for Svalbard barnacle geese, but due to sustained population growth, it has become outdated. The format of such plans should include indications of actions which would be taken/acceptable at different population ranges (progressive or regressive management?). They need to involve practitioners (either as individuals or their representative organisations) to ensure realism, that meaningful objectives are set and that there is good buy-in from stakeholders.

Pink foot numbers – these have been a problem since the 1980s. They (and migratory greylags before them) supported a not-insignificant economic driver of wildfowling although as overall numbers increased, the uniqueness of the Solway has reduced somewhat.

6.4 para 2 – Scaring does not require a licence. Consideration could be given to extending the wildfowling season to include Sundays and February and March. That would provide wildfowling-tourism benefits and would help stabilise/reduce numbers.

6.5 D&G and the Borders have ongoing widespread problems of feral greylags and Canadas. The option to extend the shooting season as per pinks, and/or cover under the agricultural general licence in Feb and March could be useful in helping provide simple mechanisms to temper numbers.

ANNEX 20: RESPONSE FROM THE INDEPENDENT PANEL TO A QUERY ABOUT INFORMATION FLOW AND REPRESENTATION VIA THE NGMRG

Supplementary Question on Information Flow and Representation via the NGMRG from SNH and the Scottish Government received via email from Morag Milne 13th Oct 2017:

"I note that those who were not consulted directly (such as the LGMGs) were unhappy about their level of involvement in the policy review process and there doesn't seem to be much recognition from within LGMGs that their national representatives at the NGMRG (including NFUS, SCF, SLE and RPID) could have represented their views to the NGMRG. We had anticipated that stakeholder representatives on the NGMRG would have sought the views of their local members before providing comments on the Review. Do you feel that this was the case? I'm interested to hear whether you feel the questions that you asked of the LGMGs would have revealed whether their national representatives sought their views? I believe your suggestion to map out the consultation process associated with future reviews, and to be clearer about the roles of different stakeholders in advance of any consultation process should help us to address this."

The Independent Review Panel outlined steps that might improve stakeholder understanding and the uptake of future consultation opportunities in section 5.2 of the draft report. These recommendations reflect the views and experience captured from stakeholders in discussions around the survey and have the support of the three authors.

The level of communication within stakeholder groups, and the development of producer organisation policy positions within the membership of the NGMRG, are clearly out-with the terms of reference of the independent review panel. Producer and land owner organisations have different structures, limited resources and rightly their own priorities and therefore stakeholder profiles vary. It would be inappropriate for the independent panel to comment on the different approaches.

Any response to the supplementary question may therefore be seen as speculative and a personal view of Nigel Miller, the panel member who had direct contact with the producer, land owner organisations and Local Goose Group representatives during the review panel process.

However the reports of teleconferences, video conferences, e-mail responses and a single one to one interview, captured as part of the independent review process, provide a window into the interaction between NGMRG members and the Local Goose Groups. [see annexes 6 to 16 of the final report].

It is clear that all the interviewed individuals involved with the NGMRG were committed to the review process and serving the best interests of their community and/or membership. The NGMRG member responses to the Independent Panel Survey demonstrated an understanding of their members' priorities and there were specific examples of issues being taken forward on behalf of local goose groups. This approach included SGRPID's representative on the NGMRG who took forward issues on behalf of the Local Goose Groups. Those processes were not visible to Local Groups.

There were however concerns regarding the role of the NGMRG expressed by its members. There was some support for a review of the NGMRG terms of reference and also of its membership.

The NGMRG is seen as a standalone advisory group which brings together largely professional stakeholders to support the Government and its agencies in both management and policy development. In common with other Government Stakeholder Groups it is not high profile across rural communities and if visible there is little buy-in from stakeholders on the ground. Comments from members of the NGMRG and of the Local Goose Groups

suggested a more proactive posture was required; that the NGMRG could be a conduit for information, should foster dialogue, should take forward issues on behalf of Local Groups and be a contact point for individuals.

At present communication pathways between the NGMRG and Local Groups are variable. Direct communication to all local goose group members from Government or its agencies was not mentioned by stakeholders during the review process.

It is unclear how many of the Local Goose Group members hold a membership of a producer or land owner organisation or if they are included on a relevant policy contact database. The profile of producer organisation membership varies across the local groups.

Only the NFUS representative on the NGMRG outlined his communication strategy. E-mailed reports on the goose policy development process were circulated to Local goose group members, wider membership and the relevant NFUS Regional Manager. These updates were mentioned by some local goose group members and by the NFUS representative on Skye.

Despite the e-mailed goose policy review updates, there was only limited feed-back from Local Group members.

COMMUNICATION – THE EXPERIENCE OF LOCAL GOOSE GROUP MEMBERS

1] Some individuals reported that they were unaware of the review process and appear to have fallen out-with any communication pathway.

2] Some individuals reported E-mail updates were only available late in the review process and/or did not fit with local group meeting schedules.

3] Some individuals reported E-mail reports or drafts did not give a clear indication of the consultation process or what issues should be addressed? Without clear guidance no response was actioned.

4] There was a report of at least one individual receiving an update marked – not for wider circulation. This designation closed down wider discussion. It is possible that this document was received from a Government Agency.

5] Local groups have different priorities which can conflict with other groups and therefore make representation through the NGMRG un-certain or un-satisfactory. The allocation of limited funding and the impact of different goose species across the groups will inevitably create conflicting priorities into the future.

6] The lack of transparency in the policy development process masks the performance and/or position of the NGMRG. That lack of transparency under-mined the confidence in the review process and the NGMRG, amongst local goose group members.

7] There was support from across the local goose groups for a more proactive role for the NGMRG, for a review of the terms of reference, and the direct representation of the Local Groups on the NGMRG. This approach might address a perceived communication deficit.

Nigel Miller
14th October 2017