

## **PE1615/B**

Scottish Land and Estates letter of 24 October 2016

We understand that the Petitions Committee will be taking evidence on Thursday 27 October on Petition PE01615 and are grateful for the opportunity to have input to that hearing.

Scottish Land & Estates is a membership organisation representing landowners, land managers and rural businesses across Scotland. We are also writing on behalf of other organisations closely involved with land and shoot management such as the British Association for Shooting and Conservation and the Scottish Gamekeepers Association who represent thousands of farm shoots, syndicate shoots, gamekeepers and other workers whose businesses and jobs are closely linked to game shooting. The PACEC study mentioned in the SPICE briefing has calculated that there are 7100 shoot “providers” in Scotland employing 8800 FTE people. There is estimated to be 120,000 participants in shooting and stalking in Scotland who could be affected by licensing of shoots.

While we recognise the interests of the Petitioners and members of the SRSG and RSPB, we do not believe that the case for licensing of all game shoots is justified and list below the key issues. We are also conscious of the similar debate currently in progress at Westminster and the evidence session on Tuesday 18th October, where it was revealed that the Petitioners had made no assessment of the potential environmental, economic, community or cultural impact if their Petition was to be taken further. We suspect that is also the case with this Petition and would urge that the Committee addresses that issue.

The main rationale behind PE 01615 is raptor persecution and the potentially adverse environmental impact of gamebird hunting. It is clear from the Government’s Wildlife Crime reports over the last five years that raptor persecution which is likely to be connected with game shooting has been in marked decline, and is now down to a small handful of incidents each year. It is simply untrue to say that “self-regulation has failed”, therefore licensing in this respect is unnecessary. Scottish Land & Estates and its members are involved in a number of initiatives such as Heads Up For Harriers and the South of Scotland Golden eagle project, and an increasing number of estates are gaining Wildlife Estates Scotland accreditation – all of these demonstrate self-regulation and driving up best practice and are more effective in promoting raptor conservation than a shoot licensing system could be.

The Petition acknowledges the comprehensive system of wildlife crime laws in Scotland and the priority that successive Environment Ministers have given it. We believe that Scotland now has probably the toughest legal regime around raptor crime, particularly with vicarious liability, and is very capable of dealing with the relatively small number of criminal incidents identified each year. We support the findings of the 2015 review into wildlife crime penalties as the “icing” on this legal structure, and question what more a licensing system could achieve that the current legal system cannot.

There is also strong scientific evidence that the environmental benefits of game shooting are considerable (upland and lowland habitat management, legal predator control and food supply in particular). Any form of land management has some impact on the environment but we believe that in the case of game shooting it is far outweighed by the benefits. The PACEC study mentioned in the SPICE briefing has calculated that there is the equivalent of 3900 full time conservation jobs funded and enabled by shooting, from professional gamekeepers to syndicate members and farm shoots. The environmental management provided by shoots is done voluntarily often at considerable private cost and if it was made too bureaucratic, the incentive for people to do it would decline.

We do not believe that the research being conducted by SNH into regulation of hunting in other countries is likely to show a good basis for shoot licensing. This is not least because it would be very expensive and time and consuming to devise, administer and enforce a licensing system which was fair and did not remove the incentive to undertake conservation work at private cost and time commitment. It is also likely that licensing would undermine the already fragile trust among rural stakeholders which is essential if collaboration and partnerships are to work successfully.

If the Petitions Committee wishes, we would be pleased to elaborate on these preliminary comments, along with other organisations involved in game shooting and their thousands of members.