

Dear

Land Reform Bill

Association of Deer Management Groups briefing on Parts 6 and 8

The Association of Deer Management Groups (ADMG) is the organisation that represents Scotland's upland deer managers and 44 upland Deer Management Groups (DMGs) which primarily cover the open red deer range.

Please see below our comments on the two Parts of the Bill, Parts 6 and 8, that have a bearing on deer management:

Part 6 – Entry in the Valuation Roll of Shooting and Deer Forests

ADMG shares many of the concerns expressed by the RACCE Committee about Part 6 of the Bill and agrees that it lacks clarity “about the purpose, delivery, impacts and likely outcome of these proposals”. Sustainable deer management is clearly in the public interest and the introduction of additional costs in the form of local authority business rates will act as a disincentive to ongoing employment and investment in deer management. Rates reintroduction is therefore likely to be detrimental to deer management investment and related employment and to work against other aspects of Government policy including those addressed in Part 8 of the Bill.

However, should this provision be implemented there is an opportunity to turn a negative into a positive by incentivising collaborative deer management if reliefs are available to landholdings which meet approved standards of deer management. Good management criteria could include membership of a Deer Management Group (DMG) or other collaborative mechanism and participation in the delivery of a DMG Deer Management Plan which complies with the DMG Assessment criteria which have been developed jointly by SNH and ADMG.

We therefore proposed an amendment to the Bill directing Regional Assessors, in valuing sporting rights, “to take account of all relevant factors including good deer management in the public interest” and, following discussion with Michael Russell MSP, he has submitted an amendment to that effect.

Part 8 – Deer Management

We do not object to the measures proposed in the Bill to add to the SNH powers to set up a Deer Management Group (DMG) or to require the preparation of Deer Management Plan.

We agree with the response of the Scottish Government to the RACCE Committee's recommendations (para 370 of the Committee Stage 1 report). Cull targets do not require to be set by SNH as they are already an integral part of deer management planning, as can be seen from the population models in the example Deer Management Plans (DMPs) (see links below). Nor do we see any added value in requiring deer managers to apply for a licence to cull deer.

Deer culling is necessary to contain numbers and those who undertake culling mostly have the benefit of industry training, DSC Levels 1 and 2, may be on the SNH Competence Register and are guided by Wild Deer Best Practice. Any measures that make it more difficult for suitably qualified and experienced persons to undertake culling would be counterproductive. As also stated in the Government response to the RACCE Committee report, SNH already has the power to intervene and undertake culls should this be necessary under the Deer (Scotland) Act 1996.

MSP amendments have been tabled prescribing public consultation on Deer Management Plans. These matters are addressed in the new Plans being written at present and in the SNH Assessment process. ADMG has developed a website template for DMGs which will enable them to post DMPs, Constitutions, Minutes of meetings and any other matters of interest, and to provide contact details. These websites, of which a small number are already established (see example links below), will be the main means of communication and consultation with local communities and other relevant interests.

Since the RACCE Committee review of deer management in 2014 and taking account of its subsequent recommendations which were endorsed by the Environment Minister, DMGs have been engaged in an intensive process of replacing and extending Deer Management Plans to take account of the public interest as defined by SNH and published in the Autumn of 2014. The new Plans, most of which have been supported by a 50% grant administered by SNH and written by independent consultants, are now well advanced and, where completed in draft, are being offered for consultation to all relevant interests, particularly local community interests. As Plans are completed over the coming weeks they can be accessed on the newly introduced DMG websites referred to above by clicking over each Group represented on the DMGs map on the ADMG website:

<http://www.deer-management.co.uk/dmgs/deer-management-groups/deer-management-group-map/>

Here are two early example DMG sites:

www.nwsutherlanddmg.deer-management.co.uk

www.breadalbanedmg.deer-management.co.uk

Click on the 'Deer Management Plan' tab in the menu bar to find the main substance of each Plan. The core of each Plan is the deer population model which sets out target populations and programmed culls to meet the objectives of Group members and deliver the public interest.

The second SNH Assessment of all DMGs to measure progress against the 2014 baseline Assessments will be carried out in the early summer. This will form the basis of a progress report to the RACCE Committee when it carries out the second review of deer management at the end of 2016. At this stage, of the 44 DMGs, covering 3.2m hectares, four have completed DMPs, 21 are near to doing so, and SNH has another 11 within the grant application process. Those remaining are preparing grant applications or self-planning without grant. A number of additional DMGs, covering new areas, are also in the process of formation.

For information attached is an information sheet answering key questions which are often put forward in respect of deer management which I hope you will find informative and helpful when the Parliament debates Part 8 of the Land Reform Bill.

If you have any questions arising from any of the above please do not hesitate to be in touch with me.

Kind regards

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Chairman

Association of Deer Management Groups

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