

Ms Mairi Gougeon, Minister for Rural Affairs and the Natural Environment, The Scottish Government

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Dear Minister,

Animals and Wildlife (Penalties, Protection and Powers) (Scotland) Bill

While the third reading amendment (Alison Johnstone – Amendment 30) to ban the culling of mountain hares may not seem a central topic for deer managers I feel bound to draw attention to the contradiction which a ban on hare management would represent when the Scottish Government commissioned Deer Working Group (DWG) has recommended removing close seasons for male deer and adjusting the close season for females and dependent young. Indeed, despite the SNH review of deer management last year which estimated the current density of open hill red deer at less than the DWG target of 10 per sq km there continues to be pressure from many quarters to further reduce deer numbers, mainly in the interests of woodland expansion.

Red deer and mountain hares share the same range and have similar diets, and neither are compatible with unprotected woodland expansion, either by planting or regeneration, which the Scottish Government rightly promotes and supports as a major element in its policy to address the climate emergency. A licensing approach as proposed would be ineffective in that it is reactive after damage is demonstrable, not preventative as is necessary.

As a result of the monitoring system introduced in recent years mountain hares are now known to be plentiful, particularly in moorland areas, your own constituency being a particular stronghold. As well as being a delight to see, they are capable of doing significant damage and a decision to ban any management culling would be perverse.

I would also make a broader argument for a balanced and coherent policy to manage grazing impacts in the uplands in the round, taking account of all herbivores - deer, hares, rabbits, feral goats, sheep (which outnumber deer 2:1) and cattle. A piecemeal approach based on species popularity ratings, which appears to underlie this amendment, will create more problems than it solves.

Yours faithfully,

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