

## **Consultation on controls on the import and export of hunting trophies.**

Following the request for responses to the Defra consultation on controls on the import and export of hunting trophies please see below response on behalf of The Association of Deer Management Groups (ADMG).

ADMG helps to coordinate the collaborative management of deer across the uplands of Scotland. Deer management is an integral part of the maintenance and/or improvement of the natural heritage of the highlands of Scotland. Deer Management Groups (DMGs) facilitate collaborative deer management undertaken in the public interest and on a landscape scale.

Currently much of the management of deer in Scotland is funded by hunters who travel to the UK to help with the deer cull. They are supervised by professional stalkers. Visiting hunters pay to help with the deer management and often the chance of a trophy from a culled deer is an important part of the trip. Visiting hunters manage deer as part of a cull plan that is agreed through the local DMG and is in line with a collaborative Deer Management Plan.

Our members would be very concerned that a ban on the export or import of deer trophies to or from the UK may diminish the demand for hunting from abroad. In 2014 ADMG commissioned a report by economic consultants PACEC (Public and Corporate Economic Consultants Limited) entitled *Contribution of Deer Management into the Scottish Economy*. The report covered 1,830,000 hectares. It showed that there were 2,532 jobs in deer management in Scotland of which 1,372 were paid and 966 were unpaid. Importantly £140.8 million of expenditure in Scotland is reliant on deer management and that of this £43.1 million is directly due to deer management services. £97.7 million of the above expenditure is from associated expenditure by hunting participants.

Those hunters coming to Scotland for deer stalking are paying a premium price to hunt male deer at an average of £557 per guest per day for red deer stag stalking (ADMG survey of stalking rents 2018). Whilst the priority is always to maintain the welfare of the herd, it is important to remember that should a hunter shoot a trophy that they would like to keep then this has always been an option. If this option is not possible then a ban could be detrimental to the demand for hunting in Scotland.

A reduction in the value of Scottish stalking may in turn increase the likelihood of jobs being lost. The fewer people employed in full time deer management may have a direct effect on remote Scottish communities where deer management and associated jobs are often the main employment opportunities.

Importantly if there were fewer people employed in deer management there would be a likely detrimental effect on woodland creation and peatland management, both of which are fundamental to carbon capture. The absence of large predators to deer in the UK means that culling by humans is vital to protect from over grazing by deer and to the maintenance of deer welfare. The Scottish deer cull is largely sustained by paid hunting.

When considering the four options offered in the consultation, ADMG would be cautious to support any ban that might threaten the sustainability of any species globally. Below are summarised our opinions on each option.

### **Option 1**

Option one would result in the prohibition of the import or export of hunting trophies to or from the UK despite the possibility that trophy hunting may be beneficial to conservation. ADMG could not support this option if species conservation was being restricted by a ban on trophy hunting.

### **Option 2**

Option two would be our secondary choice, it would require those wishing to import or export trophies from certain protected species to demonstrate they are from a sustainable population and that there is a clear benefit to conservation and local communities. ADMG would insist that the 'certain species' to be protected would be clearly identified and that UK deer species would be excluded from any import and export bans.

### **Option 3**

Option three would threaten the sustainability of deer management in Scotland and ADMG would be strongly opposed to its implementation. The import and export of all hunting trophies would be prohibitive to UK deer management.

### **Option 4**

Option four is ADMG's preferred choice. As is stated in the consultation document this provides the flexibility to determine the best management tools for species globally and retains the benefits that result from well-managed trophy hunting. Option four already excludes import and export where it might be detrimental to the survival of a species in the wild based on internationally agreed rules.

We hope that the above is clear, please do not hesitate to contact ADMG should you require any further information.

Tom Turnbull  
Vice Chairman, The Association of Deer Management Groups

January 2020