

Scotland's Biodiversity Strategy – A Consultation.

ADMG response

1. *Using your own knowledge and the evidence presented, to what extent do you agree that there is a nature crisis in Scotland? Why do you think that?*

Scotland's Nature is vitally important and the Association of Deer Management Groups (ADMG) agrees that the evidence for overall declines in biodiversity, both locally and globally, are of grave concern. There is little doubt from the information provided that there are clear challenges to Nature and Biodiversity in Scotland.

The Association of Deer Management Group members are responsible for managing over 3 million hectares of Scottish upland habitats, which are of national and international importance. The State of Nature Scotland 2019 report states that upland management is one of the key pressures acting on nature in Scotland along with others that include agricultural management, climate change, hydrological change, woodland management, and invasive non-native species (INNS).

Historically humans have had a profound influence on nature in the Scottish uplands, much of it driven by policies of the time. Significant deforestation, intensified livestock grazing, large-scale commercial forestry and the draining of carbon-rich peat bogs have all significantly altered the environment. ADMG acknowledges that a rise in deer numbers from the 1960s to 2000, will also have contributed to localised pressures on upland habitats.

In an attempt to redress some of these issues, ADMG members have for some years been actively carrying out management actions to enhance and restore habitats as part of the implementation of landscape scale management plans. Through collaborative and collective actions of ADMG members, deer numbers are declining across much of their range and populations are regularly being monitored. Groups are undertaking Habitat Impact Assessments, peatland restoration is taking place and trees are being planted all of which will contribute to restoring biodiversity in the uplands and will help to reverse and redress past land use issues. ADMG feels that it is important that this good work is recognised and biodiversity improvements are recorded where they may already be happening.

Whilst the evidence is right to focus on the potential severity and urgency of the issues, even since the publication of the 2019 report, considerable environmental action has been undertaken by upland land managers. Failure to adequately represent or recognise the positive work that has already been undertaken by many may serve to disenfranchise and alienate. ADMG fears that using the whole of Scotland as the benchmark is unhelpful and a more nuanced approach should be used.

If we are to ensure that policy and practice are aiding biodiversity, regular monitoring and publication of change will be necessary, in the past possible changes or improvements are not registered due to an over reliance on old data, for example the Native Woodland Survey of Scotland.

2. *What do you see as the key challenges and opportunities of tackling both the climate and biodiversity crises at the same time?*

With climate change now inevitable between 2022 and 2045 the extent and composition of habitats will likely change along with the various species that utilise those habitats. Monitoring will need to take account of such changes and management prescriptions for habitat restoration will also need to be adaptable and flexible to accommodate these unknown changes. There will be species winners and losers within ecosystems and this will have implications for how we define protected areas and species conservation in the future. Habitat connectivity also will be a vital consideration to enable species to move in response to changing environmental conditions.

Within the consultation document Scotland is split into Farmland, Woodlands and Forestry, Soils and Uplands. ADMG feels that this fails to recognise the important variations that occur within these landscapes and the vital role that a patchwork of habitats and land use plays in biodiversity. An oversimplified 'one size fits all' approach should be avoided if real progress is to be made on biodiversity targets. For biodiversity to thrive, there needs to be greater habitat connectivity particularly in enhancing those marginal habitats that do not currently fit into current support schemes.

Land that currently fits only marginally into agri environmental work is not available for projects. For example, schemes for planting that are not going to be 100% successful are currently not taken up. These schemes may not have been beneficial for woodland creation but they may have been very good for biodiversity and therefore should not be considered failures. Scale of projects will also be vital, in the past, schemes that would benefit biodiversity have often been deemed too small. A flexible approach to support schemes should be considered.

ADMG would encourage the Scottish Government to consider what the previous barriers have been to entrants to schemes that would have been beneficial to biodiversity. Inflexibility of schemes, challenging budgeting timelines, single year application, and a lack of consultation between different Scottish Government agencies have all been cited by our members as barriers to successful application. A pragmatic, adaptable, and flexible approach to incentives will enable change more rapidly than previous policies have.

The importance of landscape scale management and restoration is clear. Our members have been working collaboratively for thirty years and understand the importance of collecting, sharing and disseminating the data that they have. Our members come from a wide variety of land management objectives and would welcome the chance to work collaboratively with the Scottish Government in aiding biodiversity. A top-down approach to tackling biodiversity and climate crisis should be avoided. Government should collaborate with and make use of the highly trained and skilled workforce already in place.

ADMG believes that it is important that recognition is given to the fact that biodiversity loss is often a result of government policy. Land managers actions are often directed by available grant aid, for example 2.6 million breeding ewes and 6.8 million sheep in Scotland are not mentioned in this paper but are often a result of minimum stocking densities set by government. ADMG is not discouraging productive farming but in the uplands current minimum stocking densities should be re considered. Peatlands were encouraged to be drained by the government. Commercial forestry plantations that now maintain very high densities of deer were encouraged through the grant system and associated tax benefits. Government must consider the part they have played. Land management practice has often been a result of policy.

If we are to reach the biodiversity targets for 2030 and 2045 incentives need to be accessible, fast tracked and made available now.

3. *Is the draft vision clear enough?*

Yes/No comment

NO

Whilst ADMG understands and supports the importance of a vision for biodiversity, we feel that this draft vision ignores the importance of those who currently live and work on the land and this should be recognised and emphasised within the vision. Land management skills are an essential element in actions necessary to resolve our shared challenges. Jobs and livelihoods have to be maintained and there are concerns amongst the rural community of the threats to community and the heritage of those remote rural areas. Clarity would be helpful on the future for remote communities that currently rely on agriculture, sporting enterprise and deer management.

The pictorial presentation of the aspirations of what nature-rich landscapes may look like in the uplands are very reminiscent of what is already taking place in much of the highlands. It would appear that we are already some way down this path and biodiversity should therefore already be heading in the right direction. The monitoring of biodiversity improvements will be vital to measuring success. Up to date data will be needed. Previous data has been slow to be published and often out of date by the time it is acted upon.

4. *Is the draft vision ambitious enough?*

No

ADMG applauds the ambitions of the vision but we feel that there is a lack of acknowledgement of the people already working on the land. ADMG would urge that the vision refer directly to those that currently make a living from the land. Hearts and minds need to be won if change is going to take place. There is not enough focus on the potential changes to rural economies and the vital role that practitioners play.

83% of the Scottish population live in urban areas and therefore a small rural proportion of the population is being encouraged to deliver the actions required in upland areas. The rural economy must be supported and enhanced if we are going to undertake the sort of work required. Contractors for tree planting, peatland work, deer management, farm work, are all under pressure. Boosting the rural economy will enable the positive change required in this paper.

5. *Do you have any suggestions for a short strategic vision which would form the title for the strategy?*

By 2045 we will have substantially restored and regenerated the biodiversity across Scotland. Our Natural environment will be richly diverse and resilient whilst maintaining rural employment opportunities.

Education and facilitation will lead to a better understanding of the importance of biodiversity for current and future generations.

Scotland's Rural Environment – Farmland, Woodlands, and forestry, Soils and Uplands.

6. Do the 2045 outcome statements adequately capture the change we need to see?

NO

ADMG is disappointed by the concentration on deer in the uplands in this consultation document and in the outcome statements. Whilst the impacts of deer on upland habitats are acknowledged by our members, deer numbers are already dropping in the uplands. This downward trend was identified by NatureScot in their 2019 review of deer management and has continued since 2019. This consultation ignores the nuances of deer management in Scotland and the positive improvements that upland deer managers in particular have achieved. While there is still some way to go upland deer managers have already started on the solutions and this needs to be firmly acknowledged.

The lack of reference to deer numbers in the lowlands and highland fringe where deer numbers are likely to increase year on year is a concern. The 2020 Deer Working Group Report referred to this problem but is lacking in this consultation.

ADMG is pleased that upland agriculture is referred to, albeit briefly, but would endorse reference to all herbivores and not just deer. Sheep outnumber deer in the highlands with 2.6 million breeding ewes and 6.8 million sheep currently present in Scotland. Until reasonable incentives are provided to farmers in the uplands to meet biodiversity targets then in much of the uplands reductions in deer numbers will make little difference to reaching those targets. ADMG believes that the same priority should be given to agriculture in the uplands as has been given to deer.

The outcome statements again fail to acknowledge current good practice. In reading the consultation it would be easy to assume that all current land management is negligent. This is obviously not the case and it would be beneficial to state that current good practice will be exemplified and encouraged. Criticise lack of engagement by all means but equally, acknowledge progress.

We applaud the targets for increased woodlands but we would encourage the Scottish Government to acknowledge that this will provide considerable challenges for deer management. This can currently be seen in the areas of Scotland forested in the 1970s and 1980s where successful deer management of a very productive deer population is now increasingly difficult. We must learn from support schemes of the past and ensure that woodland planting now has the required design to enable deer management in the future.

Continued references to the 'deer range' and 'grouse moor' management fail to capture the multi land use objectives that most land managers already undertake. Primary objectives will vary on landholdings but most are already branching into a variety of land uses and contributing towards biodiversity.

7. Are the 2030 milestones ambitious enough? Are we missing any elements?

NO

A reformed agricultural subsidy scheme is to be applauded but it should be remembered that farmers need to plan ahead. Land managers have been awaiting new schemes for several years but nothing has been published yet. Unless plans are put into place and land managers are appropriately encouraged 2030 is approaching fast and targets will not be met.

ADMG members already collaborate on many of the issues referred to in the uplands within this paper. Landscape scale collaboration is taking place and has been delivering many positive outcomes already, including reduced deer numbers, peatland restoration, tree planting and Habitat Impact Assessments. It will be important to identify good practice and encourage it wherever possible. Existing collaborative structures like Deer Management Groups should be acknowledged and used to facilitate change where necessary.

8. What are the key drivers of biodiversity loss in this outcome era?

ADMG believes that biodiversity loss will not be halted unless a holistic approach is taken to land management. We must have a sustainable agriculture industry that is encouraged and incentivised to change. Nuance will be vital and a 'one size fits all' approach will not enable land managers to maximise localised variations in biodiversity.

There is a danger that simplified messages about deer numbers in the uplands that ignore other land uses will continue biodiversity loss. Covering large areas with blanket trees may lead to losses of biodiversity in other areas. A land use patchwork is important to biodiversity. ADMG feels that this document fails to acknowledge this.

Some of the previous drivers of biodiversity loss have been inappropriate support schemes. Land managers have often acted on government incentives only to be told that these incentives are now contributing to biodiversity loss.

9. What are the key opportunities for this outcome era?

Biodiversity targets can be met but it is vital that those currently working on the land are listened to, encouraged and incentivised.

ADMG cites the successful collaboration within deer management groups that has led to falling deer numbers in the highlands and improved habitat awareness. Recognition of this work is vital if momentum is to be maintained. Currently this consultation paper does not recognise where successful collaboration is already occurring which is infuriating and demotivating for those who are fully committed to the Climate agenda and active in delivering it. There is an opportunity to incentivise and make use of existing collaborative structures.

According to the 2019 [State of Nature Report for Scotland](#), agricultural management, climate change and upland management are highlighted as key pressures acting on nature in Scotland. ADMG notes the strategic direction required of policies and in particular those which:

- a) deliver tools and solutions for implementation and mainstreaming
- b) support recovery of biodiversity and regeneration of nature at a landscape scale and
- c) recognise that our use of natural resources has not been sustainable, and that transformational change is required in the relationship.

Of particular note to ADMG is the delivery of tools and solutions and the landscape scale required.

ADMG members account for over 3 million ha of land management in Scotland and will be pivotal and critical to the successful delivery of the Strategy. Although actions will be undertaken by individual land owners and managers, it has been [recognised](#) that local deer management groups provide an opportunity to empower land managers to work together to be effective drivers of change and a valuable mechanism to deliver landscape scale outcomes.

The aspiration to shift the rural economy away from its dependence on traditional use of the land towards a more nature orientated economy, with greater focus on woodland creation and peatland restoration will present significant challenges and change for the deer sector. As such, ADMG would hope that its members who live and work on the land, but who will be pivotal in delivering the outcomes are supported in identifying and actualising the considerable opportunities for change.

10. What are the key challenges for this outcome era?

Keeping the rural workforce required to deliver these important targets motivated and incentivised will be vital.

Simplifying the application process to support schemes beneficial to biodiversity and an increase in the funding timescale would encourage land managers who have previously attempted and failed to undertake this sort of work. Application fatigue has set in with many land managers, with previous schemes suffering from inflexibility.

Recognition is needed that applying a single simplistic approach to land management will not deliver change, what works in one part of the uplands may not work in another. Future support should acknowledge this nuance.

Deer numbers are dropping in the uplands yet this section refers to 'ever increasing deer numbers', this is demotivating to those deer managers who are already undertaking deer management in the interests of habitat and biodiversity.

Deer numbers have [decreased](#) on the open hill (NatureScot 2019). We would encourage this consultation to look at burgeoning deer populations in woodlands and the lowlands and consider the implications for future deer management in these areas.

An acknowledgement of previous good practice. The consultation reads as if all previous land management has been detrimental to biodiversity, this is clearly not the case. A more positive tone would be beneficial to this consultation.

Marine Environment

- 11. Do the 2045 outcome statements adequately capture the change we need to see?***
- 12. Are the 2030 milestones ambitious enough? Are we missing any elements?***
- 13. What are the key drivers of biodiversity loss in this outcome era?***
- 14. What are the key opportunities for this outcome era?***
- 15. What are the key challenges for this outcome era?***

Freshwater Environment: Rivers, Lochs and Wetlands

- 16. Do the 2045 outcome statements adequately capture the change we need to see?***
- 17. Are the 2030 milestones ambitious enough? Are we missing any elements?***
- 18. What are the key drivers of biodiversity loss in this outcome era?***
- 19. What are the key opportunities for this outcome era?***
- 20. What are the key challenges for this outcome era?***

Coastal Environments

- 21. Do the 2045 outcome statements adequately capture the change we need to see?***
- 22. Are the 2030 milestones ambitious enough? Are we missing any elements?***
- 23. What are the key drivers of biodiversity loss in this outcome era?***
- 24. What are the key opportunities for this outcome era?***
- 25. What are the key challenges for this outcome era?***

Urban Landscapes, Proposed Outcomes

- 26. Do the 2045 outcome statements adequately capture the change we need to see?***
- 27. Are the 2030 milestones ambitious enough? Are we missing any elements?***
- 28. What are the key drivers of biodiversity loss in this outcome era?***
- 29. What are the key opportunities for this outcome era?***
- 30. What are the key challenges for this outcome era?***

Across our land and Sea – Overall Health, Resilience and Connectivity

- 31. Do the 2045 outcome statements adequately capture the change we need to see?***
- 32. Are the 2030 milestones ambitious enough? Are we missing any elements?***
- 33. What are the key drivers of biodiversity loss in this outcome era?***
- 34. What are the key opportunities for this outcome era?***
- 35. What are the key challenges for this outcome era?***
- 36. To what extent will these outcomes deliver the vision?***
- 37. What evidence and information should we use to assess whether we have delivered the vision?***

The Conditions for Success

- 38. Have we captured the key enabling factors which are essential in order for our strategy to be successful?***

ADMG have concerns that an over emphasis on deer in isolation and sweeping statements like ‘ever increasing deer numbers’ show a lack of understanding of deer management. Deer numbers are decreasing in the uplands as evidenced by regular NatureScot helicopter counts. Recognition of this would be beneficial and encouraging rather than de-motivating to deer managers. ADMG’s members manage 3 million ha of the highlands collaboratively and in the public interest we would encourage further emphasis on deer management outside this area, for example in the forest and the lowlands.

Perhaps the greatest enabling factor for biodiversity change will be a motivated rural sector. There is a danger that this consultation loses sight of this.

- 39. Are there good examples of enabling conditions in other strategies we could learn from?***

ADMG would encourage looking at the previous barriers to change including the application process to beneficial support schemes, a lack of collaboration between government offices and a one size fits all approach to land management that oversimplifies local variations in biodiversity.

40. Can you set out how you think any of the proposals set out in the consultation might help to eliminate discrimination, advance equality of opportunity and foster good relations?

Can you provide any evidence which informed your conclusions?

ADMG feels that the consultation is overly critical of land managers who in the past have often managed land in a manner that was incentivised and encouraged by the government and are now being blamed for doing so.

The State of Nature Scotland 2019 report states that *“Historic deforestation, intensified livestock grazing since the 18th century, widespread sporting management since the 19th century and large-scale commercial forestry during the 20th century have all had significant effects on upland wildlife.”*

The planting of commercial forestry on sites of native woodland, draining moorland and over intensive farming policy are just a few of the government supported land management practices that have been encouraged through support schemes in the past but for which land managers are now being criticised.