ASSOCIATION OF
Deer Management Groups

13.12.2023

To Whom it may Concern

Association of Deer Management Groups – Consultation on Scotland's Strategic Framework for Biodiversity Response.

The Association of Deer Management Groups (ADMG) members currently manage deer collaboratively, at landscape scale, across 3 million hectares of the uplands of Scotland. Within these clusters of management, our members undertake a wide variety of integrated land management objectives and since 2014, have been instrumental in delivering nature positive landscape scale Deer Management Plans, incorporating many of the actions outlined in the consultation document action plan, including the restoration of peatlands and native woodland restoration, woodland expansion as well as collectively bringing the red deer population across the upland range below 10 deer per km^2.

Some Groups have evolved to Land Management Groups delivering Land Management Plans to reflect the diversity and wide range of land management objectives being undertaken by members. The running of Groups is currently undertaken in a voluntary capacity and largely at private cost and provides an effective mechanism for a collaborative approach to the management of deer and land as acknowledged by the Environment Minister in 2019 following an intensive period of scrutiny by the Scottish Government, and as acknowledged in the current consultation document.

ADMG fully supports the ambitious aims to improve biodiversity across Scotland and agrees that pace and scale in action is required to halt Biodiversity loss by 2030 and to ensure Biodiversity recovery by 2045. ADMG also recognises that collaboration is key to effective landscape scale action and that many of the biodiversity actions outlined in the Consultation document will fall to our members to deliver. As such, our members are critical delivery partners in the Scottish Government's strategy and ADMG would encourage the Scottish Government and its Agencies to develop an integrated approach across all policy areas which enable and empower our members to continue to deliver Nature Positive outcomes, providing adequate and effective support whilst limiting unnecessary bureaucracy and legislative burdens. Please also see below our specific comments on relevant actions in Appendix 1 below.

ADMG will endeavour to support its members through a considerable period of change ahead, however, have significant reservations that with land managers being asked to fundamentally change their practices, the targets will not be achieved in such a short time frame. This will not be due to a lack of willingness to change but from a lack of facilitation and incentives by Scottish Government. 2030 is fast approaching and we still do not know the future for Land Reform, agriculture support, Forestry Grant Schemes or biodiversity. Greater clarity is needed from Scottish Government and this consultation is currently lacking the details required to feedback appropriately.

ADMG believes that there is a lack of acknowledgement in the consultation as to why much of the work that would improve biodiversity has not been undertaken in the past. There are significant lessons to be learned and previous agricultural, forestry and other support schemes have been complicated, slow and prohibitive to biodiversity improvement. Significant schemes have been prevented through existing barriers to change.

Streamlining support and considerable incentives will be required for land managers to undertake the sort of positive work for biodiversity proposed in this document. Support for those currently employed in deer

management has been significantly lacking with many feeling that their livelihoods are threatened by the potential changes proposed in this document, including significant deer reductions. Not enough work has been undertaken by Scottish Government to better understand the views of deer managers who hear about a just transition but feel that their concerns are not being taken seriously enough. The Scottish Government needs to be able to demonstrate what Just Transition means in practice, in supporting fragile rural economies to adapt; not only securing jobs in deer management, but ensuring that deer managers have the skills, training and support to provide effective deer management in the future.

As our members are key stakeholders in the delivery of many of the actions outlined in this consultation, ADMG has provided detailed comments on the specific relevant actions in Appendix 1. Specifically, the section on page 21 referring to the action: **Substantially reduce deer densities across our landscapes in parallel with ensuring sustainable management of grazing by sheep to improve overall ecosystem health** is of most relevance to our members but requires more information. Currently it is difficult to comment without further detail, but our concerns are as follows:

***Introduce new deer legislation which will modernise the Deer (Scotland) Act 1996 and introduce new powers for intervention for the purposes of enhancing or restoring nature, including preventing biodiversity loss, by 2025*.**

Deer legislation will be updated and reinforced within a proposed Environment Bill early next year. ADMG is concerned that this may take a one size fits all approach and will not reflect the requirements of managing different deer species in a vastly differing landscapes, nor provide the clarity or the flexibility that deer management requires for collaborative deer management to be effective on a landscape scale. Powers of intervention already exist and should be used where appropriate. As an organisation we don't object to intervention when significant steps have been taken to liaise with those deer managers involved prior to regulation. Changes to deer legislation must be light-touch, evidence based and enabling.

***Establish a national deer management programme including monitoring capacity*.**

ADMG welcomes a national deer management programme as outside the deer management group area little is known about deer numbers, cull levels, larder facilities and the fundamentals of deer management planning. Within the 3 million hectares of the uplands over which our members operate, deer densities, cull targets and habitat data are already known and agreed with NatureScot representatives. Deer numbers have been falling since 2000 within the upland red deer range, but despite this it is our member Deer Management Groups that come under pressure. An equitable approach is required in implementing effective deer management across the entire deer range, particularly where numbers are unknown and engagement with deer managers is limited, for example in the lowlands, Local Authority areas and private forests.

Considerably more resource will be required to support an effective deer management programme, both directly and indirectly, including support for the venison sector. The provision of up to date, open-source data and information as well as clear guidance on metrics to help inform future management will be essential. Support needs to be provided to lowland deer management and incentives are needed for deer managers in the uplands to further reduce numbers without risking livelihoods. A venison subsidy has been proposed in outline jointly by Scottish Venison, ADMG and Environment LINK. To be effective in supporting an additional cull however this would in our view need to be applicable to all areas with a separate, dedicated fund set aside. As far as we are aware there are no other incentives on the table regardless of this being one of the workstreams of the Strategic Deer Board.

Set deer cull to level at which habitats and ecosystems can recover and regenerate and deer densities are maintained at sustainable levels and appropriate to context by 2030.

ADMG has significant concerns about the use of blanket target densities moving forwards. The transitory and highly mobile nature of deer populations means that spatial deer densities can fluctuate considerably, seasonally and temporally. As such, use of density figures alone are often meaningless and can be misleading. That said, Deer Management Groups are already heading in the right direction and the target densities alluded to in the consultation are likely to be achieved on the open hill in almost all DMGs. All those groups currently over 10 deer km^2 have population models in place to reduce deer numbers and they work closely with NatureScot to ensure that these targets are achieved. Across the upland open range, red deer densities already sit at 9.3 deer km^2 on the open hill according to the 2019 SNH Review on Deer Management.

However, ADMG has concerns about a blanket density of 2 deer km^2 being associated with 'priority woodland', particularly if the intention is to make these statutory targets. Whilst ADMG in principle fully supports the restoration of woodlands, and recognises the importance of designated and ancient woodland, significantly more information is required firstly on what 'priority' woodland refers to and how deer numbers will be reduced to 2 deer km^2 without significant incentives in place to do so. Previous experience has identified that many designated woodlands occur in geographically remote and challenging locations which makes remedial work costly and resource intensive. Deer move in and out of woodland and so to achieve this density, deer management and in some cases removal of livestock will have to take place across a far wider area and the levels of investment required would be considerable with an associated loss of income. Whilst we are aware that the Strategic Deer Board are considering incentives for deer management, with an outline proposal for a venison subsidy as indicated above, as an organisation we keep hearing there are no dedicated funds.

Within Deer Management Groups we are very aware of deer densities and work hard to reduce numbers where habitat information deems this necessary, however, outside DMGs little is known. The target of 10 deer km^2 across the whole of Scotland shows a lack of understanding of deer numbers in heavily forested areas outside the DMG area. This is a highly ambitious target and we believe that Scottish Government should look closely at current densities on the National Forest Estate prior to implementing this target. FLS have made considerable efforts and at a high expense to reduce deer numbers but still struggle to achieve densities of 10 deer per km^2. Outside the National Forest Estate this target for woodland and forests is even more ambitious and likely to fail, particularly with no knowledge of deer numbers, culls etc. it may take until 2030 just to start to get to grips with this data. Numbers in heavily forested areas will not be known without the implementation of expensive dung counts or a programme of thermal counting using drones and there is currently no incentive to undertake these. It is vital that Scottish Government is not setting up deer managers throughout Scotland to fail through no fault of their own.

Future success in increasing culls relies on having a strong and resilient venison market in place to enable that product reach the market. Without significant investment in all aspects of the venison process, including support for both the supply and demand parts of the process, the proposed cull increases of 25%-30% could place the current venison sector under considerable threat. As stated earlier, ADMG with Environment LINK and Scottish Venison have put forward a joint proposal that suggests funding is provided by Scottish Government to support the sector adequately at the point of cull. However, we know from recent reports that further investment and support is required to support processing and marketing both locally and nationally. Also increased culls in England combined with a restricted export market, places the current UK system under considerable strain. Without a buoyant venison market, current cull targets will not be deliverable. The venison sector needs more support from Scottish Government to enable its development.

Explore how best to support optimal herbivore densities to enhance biodiversity outcomes in the uplands.

ADMG welcomes the consultation referring to herbivores and not just deer. Sheep also find young trees palatable as do feral goats, mountain hares and rabbits. Livestock numbers are well known by Scottish Government and minimum stocking densities remain in place. ADMG strongly supports a more holistic approach to the management of grazing pressure and the need for integration of the strategy across all policy areas including agriculture, forestry and climate change.

Establish mechanisms to ensure new and existing woodlands are designed to enable effective and safe deer management such as within revised FGS by 2027.

ADMG would welcome a forest design approach to help consider how deer management will be undertaken in new and existing woodlands. Consideration needs to be given to how deer are culled, extracted and access is achieved. Forests created in the 1970s and 80s allowed for deer numbers to increase and for deer management to become almost impossible until forests were restructured: lessons need to be learned from the mistakes of the past.

The proposal to protect an added 990,000 hectares of land through designated sites is admirable, however, current designated sites are not assessed regularly enough and there can be a lack of clarity on targets, with land managers needing realistic targets and a close working relationship with NatureScot to address existing issues, the case of Flanders Moss is a good example of this. In considering the proposal to designate a new National Park, ADMG recognises that funding is limited and more money going to a limited number of land managers may create a two-tier approach to land management. Careful consideration should be given to how National Parks work with land managers to improve biodiversity without creating a conflict between environmental, economic and social objectives. Again, a Just Transition approach is vital here and more time has to be invested in working with landowners and deer managers.

The proposed changes to agriculture are welcomed as is the recognition that it's not just deer that graze the uplands. Currently existing AECS schemes are slow, underfunded, complicated and expensive to enter into. To enable change at the pace and scale demanded by Scottish Government it will be necessary to speed up and streamline the existing system. Working with farmers who currently operate in line with Scottish Government support will be vital to a Just Transition and achieving the targets set out in this document.

ADMG agrees that woodland creation is vital to improve biodiversity but currently the FGS is underfunded, slow and not achieving the targets set out by Scottish Government. To improve biodiversity, consideration should be given to the current requirements for stems per hectare that preclude planting on marginal sites that would be beneficial for biodiversity. Wall to wall trees are not always best for biodiversity and broken ground and low density planting options would be hugely beneficial. The current system is inflexible and precludes people from planting at higher altitudes and on poor ground. This is also relevant to looking at the importance of establishing habitat networks across the uplands.

The proposal to manage grazing and therefore increase the facilitation of natural regeneration oversimplifies the ability of some landscapes to regenerate, in the absence of a seed source and with a proliferation of Molinia grass, many landscapes which have been degraded through intensive historical grazing practices, simply will not regenerate without deer fencing and the creation of a seed source. To expect people to manage deer down to levels where regeneration is expected despite a lack of seed source, would be setting them up to fail, particularly when deer management is undertaken at a net cost and no funding or incentive for deer management is available from Scottish Government and where livestock and other herbivores remain.

ADMG is extremely supportive of the proposal to embed biodiversity and nature in curriculum development and would encourage Scottish Government to promote rural jobs and employment opportunities to a wider

audience. The creation of habitat and woodland as proposed in this ambitious consultation will create a thriving deer population that will become increasingly difficult to manage over time and we will require highly motivated and professional deer managers, not only in the short to medium term but particularly in the long term.

In summary, ADMG members are in a strong position to deliver many of the actions outlined in the consultation. To achieve this ADMG believes that the deer management sector will be pivotal to the successful delivery of many of the targets and therefore requires adequate future funding support. Deer management is currently underfunded and the message that we keep hearing from Scottish Government is that there's no money available for deer management: this needs to be addressed.

Effective deer management will underpin the successful delivery of many of the Government's objectives however, socio-economic sustainability must be considered alongside ecological sustainability if fragile rural communities are going to continue thrive and deliver not just biodiversity but on climate-change targets. Where changes are being made which will affect land management businesses, if this is considered to be in the public interest, it is reasonable to argue for proportionate public investment and support. It is also important that the responsibility for change is a shared societal one, that includes not just landowners and managers, but Government, the economy and wider society.

In tackling the nature emergency this consultation, while at this stage lacking detail, is ambitious in the extreme, and whilst as an organisation ADMG is keen for its members to continue to contribute, we do feel that the wide-ranging topics covered within the document means that the nuances and complexities of deer management are missed. Whilst we believe that some targets for deer might be achievable, indeed have been achieved in much of the uplands, in particular there is a lack of detail on priority woodlands and where they might be, how deer densities will be measured away from open hill areas, how culls will be collated outside DMGs and what incentives there might be to increase culls which are currently undertaken at a loss to deer managers.

To enable a just transition for deer managers, they need to be made to feel their jobs are not placed at risk through increased culls. The Finding the Common Ground Project that the industry has been involved with has highlighted the fears that many in deer management have for livelihoods and this consultation will not allay those fears.

Given the importance of our members in delivering many of the actions in this consultation and the potentially far-reaching implications of some of these actions for fragile rural communities, rural businesses and jobs, ADMG would welcome an opportunity for further consultation and in particular, clarity on some of the detail on how deer managers can aid the Biodiversity Strategy.

As the representative organisation for Deer Management Groups, it should be noted that many members of individual Groups will be submitting their own responses to the consultation.

Thank you for the opportunity to comment.

Yours Sincerely

Tom Turnbull

Chair, Association of Deer Management Groups.

Appendix 1: Specific ADMG Comments on Biodiversity Actions

Code*	Priority Action	Action	ADMG Comments
O	Introduce statutory nature restoration Targets	Drive cross sectoral action by introducing a framework for statutory nature restoration targets in the proposed Natural Environment Bill (scheduled to be introduced in this parliamentary session).	Need to ensure targets are easily quantifiable and up to date, with clarity on how these will be measured and reported. The deer densities targets suggested in this consulation should not become statutory.
W	Introduce a Programme of Ecosystem Restoration	Identify and facilitate partnership projects for six large scale landscape restoration areas with significant woodland components by 2025 and establish management structures with restoration work progressing by 2030.	ADMG would welcome more detail on this action. It will be essential to ensure that consultation with landowners and local communities is undertaken at the earliest opportunity. Deer Management Groups/Land Management Groups (DMGs/LMGs) have been undertaking landscape scale planning since 2014 and delivering at scale through Deer Management Plans providing effective mechanisms for collaboration.
W	Introduce a Programme of Ecosystem Restoration	Develop the new Register of Ancient Woodlands, to include locational data, a definition of the required 'protected and restored' condition of ancient woodlands, and a process for recording ancient woodlands that reach the required standard.	Important that data are up to date, widely available and accessible in GIS formats. Definitions or required conditions are welcomed and helpful for landowners to have a positive reporting mechanism.
W	Introduce a Programme of Ecosystem Restoration	Support landowners to protect and restore priority ancient woodlands by 2030, where the initial priority list is those protected/designated woodlands that are currently in unfavourable condition.	Previous cases to protect and restore designated woodland have found funding options to be insufficient and too rigid - need flexibility in approaches and sufficient levels of support. Priority woodlands are often in inaccessible and challenging geographical locations which means the current levels of support are often insufficient to cover costs. Also in places - woodland may be slow to respond and will require longer-term solutions to be in place. If targets referring to 2 deer per km2 are to be pursued - then effectively this means in practice taking a zero-tolerance to deer and sufficient support and incentives, over appropriate timescale, will be neccesary to deliver these targets. Flexible approaches will be required with a suite of deer management options available to managers (including deer fencing and other novel deer exclusion techniques).
W	Introduce a Programme of Ecosystem Restoration	Develop a strategic approach for restoring Scotland's Rainforest by 2024 - Building on the work of the Alliance for Scotland's Rainforest, agree and publish a strategic approach - Working with partners, produce a framework for funding and support SG delivery in priority areas - Investigate the application of technology to improve monitoring and follow up work.	As above. The use of technology to improve monitoring and provide up to date data on progress is welcomed.
U&P	Introduce a Programme of Ecosystem Restoration	Develop best practice guidance on measures for upland restoration to regenerate peatlands, increase native woodland cover, manage grazing, protect certain target species and priority habitats, and increase habitat heterogeneity.	ADMG fully supports up-skilling and supporting land managers to collect data on habitat condition and impacts in order to inform future management actions. The Wild Deer Best Practice Guidance series has been in place for the last 15 years and provides comprehensive support to deer managers. As live-documents, the guidance should reflect changing circumstances and be adapted and updated accordingly. ADMG welcomes the stregthening of the current BPG series to help empower deer managers on the ground and agrees with inclusion if the topics proposed. ADMG would highlight this as a priority action. BPG should also be updated to support the gathering of data by deer deer managers as per the use of "citizen science" in monitoring but a review is needed to ensure data being collected are fit for future purpose. Also need better guidance for understanding habitat responses and recovery - need to ensure that methodology is able to reflect this.

U&P	Introduce a Programme of Ecosystem Restoration	Develop a national peatland monitoring framework that incorporates onsite and remotely sensed assessments of biodiversity indicators, climate resilience and associated functions within the wider landscape, hydrological and ecological network contexts.	Important to monitor peatland restoration and particularly if there is a need to evolve and adapt practices in light of climate change.
F	Introduce a Programme of Ecosystem Restoration	Implement a programme of measures to restore catchments and rivers a through River Basin Management Planning to achieve 81% of water bodies at 'Good' or better condition by 2027.	Many of ADMG members are also members of Fisheries Boards and take an active interest in Atlantic Salmon conservation and riparian woodland restoration. ADMG is actively engaging members on this and recently collaborated with Fishmonger's Company to raise awareness and encourage action.
F	Introduce a Programme of Ecosystem Restoration	Convene stakeholders to implement local and national catchment restoration initiatives, developing best practice through demonstration sites and the provision of expert advice (2030).	ADMG welcomes the promotion of best practice through successful demonstration sites and is actively promoting collaboration for landscape/catchment scale initiatives through exisiting DMGs/LMG collaborative mechanisms. More support for catchment scale collaboration and provision of expert advice would be welcomed.
O	Implement Scottish Plan for INNS Surveillance, Prevention and Control.	Take action to ensure pathways for the introduction and spread of INNS are managed to prevent or reduce their rate of introduction and establishment, and prevent further damage to ecosystems. To include: - reducing the rate of establishment of known or potential INNS by at least 50% by 2030 compared to 2020 level; and - detection of priority INNS through increased inspections and vigilance of citizen scientists and eradicated or contained before they become established and spread.	Of relevance for deer management is the spread of sika deer. Previous attempt to limit their spread have been unsuccessful and ADMG recognises the challenge and the considerable resource element that will be required to reduce sika numbers if this is identified as a priority. Any attempt to limit the spread or populations of sika must also be done to the highest welfare standards. DMGs/LMGs are already vigilant to the introduction of muntjac and Chinese water deer. Feral pigs is an emerging issue for many DMGs/LMGs with groups monitor their spread and distribution. Greater guidance and practical support for managing feral pigs is urgently required involving landscapee scale management & collaboration.
O	Implement Scottish Plan for INNS Surveillance, Prevention and Control.	Develop and implement a pipeline of strategic INNS projects to coordinate the control of priority INNS at scale, to eliminate or reduce the impacts of INNS in at least 30% of priority sites by 2030.	Must be financial support to accompany this. Many INNS species are particularly challenging as per above.
O	Implement Scottish Plan for INNS Surveillance, Prevention and Control.	Raise public awareness of the impacts of INNS and embed INNS biosecurity practice across industries and recreational activities linked to the most important pathways of introduction and spread by 2030.	ADMG is concerned at the risk to native deer populations from Chronic Wasting Disease from the US and Europe. The impact would have serious implications for native populations and also for the venison sector. Greater public awareness, screening, precautions and biosecurity measures are urgently required.
O	Substantially reduce deer densities across our landscapes in parallel with ensuring sustainable management of grazing by sheep to improve overall ecosystem health.	Introduce new deer legislation which will modernise the Deer (Scotland) Act 1996 and introduce new powers for intervention for the purposes of enhancing or restoring nature, including preventing biodiversity loss, by 2025.	A move to amending the legislation to introduce new powers for the purposes of enhancing or restoring nature, may mean imposing regulatory targets on landowners that move away from simply preventing damage (as per the current Act) to requiring restoration targets to be met which may take many years to achieve, particularly in geographical areas where habitats are slower to respond. The implications for ADMG members of these changes is at present unclear but it would suggest that significant public resources will be required to administer such amendments.
O	Substantially reduce deer densities across our landscapes in parallel with ensuring sustainable management of grazing by sheep to improve overall ecosystem health.	Establish a national deer management programme including monitoring capacity.	ADMG welcomes a national approach to deer management and welcomes the equitable application of a deer management programme not just across the upland DMG range (as is currently the case) but also across the lowlands, Local Authority areas and established woodland/forestry. Through the network of DMGs/ LMGs already have 3m ha of uplands covered by DMGs/LMGs largely at private cost but without the collaborative mechanisms in place outwith these areas, a programme of deer management will require signficant resource to undertake. As per the comment above, ADMG would hope that a national deer management programme would reflect that deer are still a resource for many in the uplands and any impact of deer reductions on rural businesses and jobs should be considered in the context of a just transition.

O	Substantially reduce deer densities across our landscapes in parallel with ensuring sustainable management of grazing by sheep to improve overall ecosystem health.	Set deer cull to level at which habitats and ecosystems can recover and regenerate and deer densities are maintained at sustainable levels and appropriate to context by 2030; Broad targets of 2 deer per km2 in priority woodland, 5-8 deer per km2 in Cairngorms National Park and 10 deer per km2 nationally by 2030.	The setting of culls levels at which habitats and ecosystems can recover is a complex process. Deer are a natural part of many ecosystems, within which different habitats may benefit from different levels (and different types) of grazing pressures. There is no "one size fits all" approach to restoration/reneration and management actions required, particularly relating to deer management, will depend on a range of complex factors including spatial and temporal scales, geographical location, current ecological condition and an understanding of the ecological potential of habitats as well as other contributing factors such as historic, legacy impacts and management. For this reason, broad targets for deer density should be treated as exactly that. Should these be incorporated as statutory targets, there would be a real concern as to how they would be enforced and implemented. It is also unclear what spatial scales these targets will apply to and it should be acknowledged that meeting such targets may have a wider impact and require deer management over a wider area than just the target areas if deer control alone is to be used.
O	Substantially reduce deer densities across our landscapes in parallel with ensuring sustainable management of grazing by sheep to improve overall ecosystem health.	Set deer cull to level at which habitats and ecosystems can recover and regenerate and deer densities are maintained at sustainable levels and appropriate to context by 2030; Broad targets of 2 deer per km2 in priority woodland, 5-8 deer per km2 in Cairngorms National Park and 10 deer per km2 nationally by 2030.	Continued - The transitory and highly mobile nature of deer populations makes the implementation of statutory density targets (particularly the lower ones) largely unworkable and effectively meaningless. Whilst across 3m ha of the upland red deer open range numbers are already below 10 deer per km2, the target of 2 deer per km2 in priority woodland requires a clearer definition. The practical reality of that target is a zero tolerance approach to deer - acheived either through fencing or deer control. If control is to be implemented without fencing, then adequate funding must be in place to support deer management for the time it takes for trees to establish - ie 10 - 15 years minimum. If fencing is to be used as a tool- then funding for fencing must be adequate to cover fencing in extreme and challenging, remote locations. There is also need to ensure measures of success for habitats and ecosystems are not too prescriptive and flexible as ecological restoration and the response of habitats will rely on many factors, including responses of species and habitats to the effects of climate change. Rather than a regulatory approach, achievement of increased culls will be most effectively achieved through direct incentives along with investment to support a resilient and sustainable venison sector.
U&P	Substantially reduce deer densities across our landscapes in parallel with ensuring sustainable management of grazing by sheep to improve overall ecosystem health.	Explore how best to support optimal herbivore densities to enhance biodiversity outcomes in the uplands.	There needs to be greater understanding about what is possible to achieve geographically by way of ecological restoration and biodiversity outcomes. A better understanding of what the ecological response will be and also how species might be adapting to climate change is also required. Woodland restoration may take up to 30 years in parts of the country and depending on the extent of historic impacts - may require further complementary management intervention such as planting or disturbance through cattle grazing. There is no one size fits all approach and it is important to manage expectation of what ecological restoration might in practice deliver. Consideration should also be given to future wildfire mitigation including public education and practical mitigating actions which may require adequate funding to respond to wildfires. Supporting optimal herbivore densities will require an integrated approach to upland management and will require agricultural and ecological measures that are complementary to objectives, incorporating the impact of a range of herbivores. ADMG would support investment in technology and guidance to support decision making and appropriate management actions.
W	Substantially reduce deer densities across our landscapes in parallel with ensuring sustainable management of grazing by sheep to improve overall ecosystem health.	Establish mechanisms to ensure new and existing woodlands are designed to enable effective and safe deer management such as within revised FGS by 2027.	ADMG welcomes the establishment of mechanisms to ensure new and exisitng woodlands are designed with future deer management in mind. This will also require adequate funding to be in place for road/access networks to aid management and the ability to extract carcasses. Consideration should also be given to wildfire mitigation in the planning process.

o	Enhance water and air quality. Undertake water management measures to enhance biodiversity.	Contribute to the reform of UK chemicals regulations by 2030.	Consider provision for the use of chemicals which might be required for long term biodiversity gains e.g. in the case of bracken control.
o	Ensure that at least 30% of land and sea is protected or conserved and effectively managed to support nature in good health by 2030 (30 by 30)	By 2030, ensure that at least 30% of land and sea is protected or conserved, as protected areas or Other Effective Area Based Conservation Measures (OECMs), and effectively managed to support nature restoration.	On any landscape scale project, early consulation with landowners and local communities will be vital. If the expansion of protected areas requires a significant change in deer management, it is important that consideration is given to a just transition for deer managers on the ground affected by socio-economic impacts. Scottish Government will need to ensure that adequate funding is in place to support management of protected areas. Approaches should be enabling and ensuring that landowners have collaborative approach between Scottish Govermnent and landowners. Need to ensure good guidance, good data and direct support to ensure regular and adequate monitoring of protected areas. Important to learn from previous experiences with designated sites and avoid simply drawing lines on a map when consideration of wider ecosystem services and functions may be more appropriate. Also have to ensure that land is protected but that management can respond to and incorporate changes to species and habitats adapting to climate change.
o	Ensure that at least 30% of land and sea is protected or conserved and effectively managed to support nature in good health by 2030 (30 by 30)	Develop and implement a monitoring regime to ensure that Protected Area sites deliver their objectives.	Monitoring must be effective, regularly implemented and useful feedback provided to landowners in timely way.
w	Ensure that at least 30% of land and sea is protected or conserved and effectively managed to support nature in good health by 2030 (30 by 30)	Establish a programme to enable protected woodlands to be brought into favourable condition with clear targets and a clear framework for decision making.	Lessons should be learned from previous attempts to bring woodlands into favourable condition. In the past, often funding mechanisms have not been adquate or flexible enough particularly for woodlands in remote or challenging locations.
o	Expand the role of National Parks and ensure they act as exemplars of biodiversity protection and recovery	Designate at least one new National Park by 2026.	Early consultation with land owners, local communities and neigbouring interests will be essential.
o	Expand the role of National Parks and ensure they act as exemplars of biodiversity protection and recovery	Ensure National Parks, National Nature Reserves and protected areas are exemplars in better delivery of biodiversity outcomes by 2030.	Need for sufficuent funding and effective collaborative mechanisms to be in place. Ensure that National Parks, NNRs and protected areas are inclusive and consultative to avoid a "then and us" perception from landowners.
o	Fulfil the potential of National Nature Reserves (NNRs) for nature recovery	Actively use the NNR suite to develop, deliver and demonstrate best practice in wildlife management – putting in place five demonstration examples by 2025.	ADMG welcomes the use of demonstration sites to promote best practice in deer and land management.
o	Identify, expand and enhance Nature Networks and ecological connectivity	Ensure nature networks are implemented in every Local Authority area to provide connectivity between important places for biodiversity, deliver local priorities and contribute to strategic priorities at regional and national scales by 2030.	DMGs/LMGs will be in strong position to contribute to nature networks and ADMG welcomes the approach that "Engagement with partnerships and communities will be inclusive, empowering and facilitate bottom-up activity".

O	Champion new planning and development measures for protecting and enhancing biodiversity	Explore options for developing a biodiversity metric or related tool, specifically for use in Scotland.	ADMG welcomes the action which is long over-due. A credible and standardised Biodiversity Metric will be necessary to underpin further discussions on private investment in nature, particularly at landscape scale. As an essential element of Ecosystem Services audits, a standardised measurement for biodiversity is urgently needed. A Biodiversity Metrics is already in place in England - however, a EUNIS based system for Scotland would be helpful to work alongside HabMoS data. It is disappointing that there is no SMART target attached to this action as it is a fundamental building block in supporting land managers to deliver future actions and in measuring success both at individual land-holding and landscape levels and underpins much of the actions relating to the agricultural support framework as well as future investment in nature.
W	Ensure that forests and woodlands deliver increased biodiversity and habitat connectivity alongside timber and carbon outcomes	Update woodland management guidance and plans (between 2023 and 2030) to reflect greater emphasis on actions that will improve biodiversity including use of elements from Site Condition Monitoring and Woodland Ecological Condition (WEC) monitoring.	Need to ensure adequate funding available for deer management, fencing and monitoring of populations and grazing impacts. Also need to ensure good planning for deer management in the future, including access provision and carcass extraction.
W	Ensure that forests and woodlands deliver increased biodiversity and habitat connectivity alongside timber and carbon outcomes	Restructure woodland during restocking. Undertake management interventions to incorporate a greater diversity of species, habitats and structure that benefit biodiversity and allow achievement of other forestry management objectives.	As comment above. Consideration must also be given to the role of deer management in delivering a greater diversity of species - particularly those species and habitats that are palatable/attractive to deer. Guidance should be developed to aid decision making process where there may be a conflict between carbon and biodiversity outcomes.
W	Ensure that forests and woodlands deliver increased biodiversity and habitat connectivity alongside timber and carbon outcomes	Increase biodiversity in all woodlands through diversifying woodland age structures and species mixes, increasing woodland extent and connectivity (and edge habitat), increasing woodland heterogeneity, and the amount of deadwood, and managing grazing and browsing effectively to facilitate natural woodland regeneration and development of a ground/shrub layer as part of Sustainable Forest Management.	Future FGS schemes must be flexible and take into consideration that certain species mixes may be more attractive to deer pressure. It will be essential to ensure a deer management component to future funding (to cover culling, population monitoring and damage assessments).
F	Ensure that forests and woodlands deliver increased biodiversity and habitat connectivity alongside timber and carbon outcomes	Identify site appropriate riparian buffers using an evidence based approach and implement them through a range of mechanisms including the agricultural reform programme, forestry grants and private restoration initiatives by 2027.	Currently riparian woodland creation is costly to implement. Riparian woodland will require novel approaches to funding packages as well as flexibility in exploring the use of different deer management techniques.
O	Revise Scotland's list of priority species and habitats for biodiversity conservation	Undertake a review of NatureScot's licensing approach for species conservation and management, consider outcomes and develop a programme to implement recommendations by 2024.	Any review of Out of Season/Night Shooting authorisations for deer management should consider health & safety issues, public safety, deer welfare, reporting and record keeping.
O	Develop effective species recovery, reintroduction and reinforcement programmes	Undertake measures to reduce human pressures to give habitats and species (especially specialists; arctic/alpine) more chance of surviving and improve the status of red listed species in Scotland.	ADMG would welcome more support from Scottish Government and NatureScot in highlighting the challenges that access can bring for deer management in certain areas.
O	Develop effective species recovery, reintroduction and reinforcement programmes	Support surveillance and monitoring to manage pathogens and disease risks.	ADMG is concerned at the risk to native deer populations from Chronic Wasting Disease from the US and Europe. The impact would have serious implications for deer populations and also for the venison sector. Greater public awareness, screening, precautions and biosecurity measures are urgently required. Also the emergence of Bluetongue in England is of concern.

M, F	Implement measures to protect and recover Scotland's wild Atlantic salmon and migratory fish populations	Deliver the actions set out in the Wild salmon strategy Implementation plan 2023- 2028 to improve habitat and reduce pressures on salmon and other fish species	Many ADMG members are also members of Fisheries Boards and take an active interest in Atlantic Salmon conservation and riparian woodland restoration. ADMG is actively engaging members on this and recently collaborated with Fishmonger's Company to raise awareness and encourage action.
O	Drive increased investment in Biodiversity and Nature Restoration	Develop a Biodiversity Investment Plan for Scotland which supports the delivery of the Scottish Biodiversity Strategy.	It is clear that delivery of the actions contained in the Strategic Framework for Biodiversity will require considerable funding and that there will be a shortfall in the public funding available to deliver it. With the importance and reliance on Private Investment, it is important that clarity is provided for land owners and that risks are considered.
O	Drive increased investment in Biodiversity and Nature Restoration	Maintain and seek to increase investment in nature restoration through our £65 million Nature Restoration Fund.	Currently competitive nature of schemes may be a discincentive for land owners to undertake preparatory application work.
U&P	Drive increased investment in Biodiversity and Nature Restoration	Develop the targeting of peatland restoration for cost effective delivery (i.e. identifying priority restoration projects) including for greater private investment in peatland restoration.	This action would be helpful for ADMG members but should not preclude those who wish to retsore schemes not on the priority list. Funding for Collaborative Land Management projects have been made available through Cairngorms National Park Authority but it would be useful to see this type of funding being made available elsewhere.
U&P	Drive increased investment in Biodiversity and Nature Restoration	Scale delivery of the Peatland Action programme, restoring the condition of peatlands as a key ecosystem in line with Net Zero targets and supporting the expansion and upskilling of the peatland restoration workforce.	ADMG welcomes this action which is long overdue.
A	Provide direction on, and investment in, green skills and local economic opportunities supporting naturebased education, nature restoration skills and volunteering	Establish supported nationwide information and advice for land managers on biodiversity management including best practice and innovation through the complimentary tier of the new agricultural payment framework.	ADMG welcomes the availability of clear guidance, the provision of advice underpinned by the development of a standard biodiversity metric.
U&P	Provide direction on, and investment in, green skills and local economic opportunities supporting naturebased education, nature restoration skills and volunteering	Develop guidance to support a programme of training/education for land managers to support best practice on: peatland and woodland restoration; deer and livestock management; integrated land management best practice; and, species and habitat management.	ADMG welcomes the development of best practice guidance and a programe of training for land managers. This is already underway through Wild Deer Best Practice series but would be useful to be expanded to include integrated land management best practice. ADMG sees this as integral to a just transition - providing training and skills development to ensure deer managers can adapt to future challenges. ADMG would also support the provision of widely available, up to date open source data and the development of technology to support decision making. As a wider objective, it would be useful if land owners/managers/consultants had access to the latest scientific publications which are often only available through academic institutions. There is an increasing need to ensure a synergy between science, data and practical application/integration of science in management actions for biodiversity.
O	Engage and strengthen the connection between people and communities with nature	Develop a communication and engagement programme by 2024 to raise awareness and understanding of the importance of biodiversity and its links to climate change and the changes needed to ensure a just transition to a net zero and nature positive Scotland.	Whilst communication and raising awareness is important, just transition funding must be available as a priority to support those most affected by the changes being implemented to deliver net zero and nature positive Scotland. This will be particularly relevent to the deer management sector.
S	Engage and strengthen the connection between people and communities with nature	Promote Scotland's Geodiversity Charter and raise awareness of the role of geodiversity in the delivery of valuable geosystem services that serve the needs of biodiversity conservation and restoration by 2024.	ADMG very much welcomes promotion of geodiversity and this is reflected in the need to move away from a one size fits all approach to deer management and biodiversity conservation and restoration. Future actions must reflect and take account of geodiversity.

O	Embed biodiversity and nature in curriculum development	Progress delivery of the outdoor learning elements of the Learning for Sustainability Action Plan, including nature connectedness and learning, to meet Target 2030 so every 3 – 16 place of education becomes a Sustainable Learning Setting.	ADMG fully supports outdoor learning and many of it's members already work in partnership with places of education to facilitate opportunities for young people to connect with nature, learn about the environment and understand the opportunities for future employment in the rural sector.
O	Embed biodiversity and nature in curriculum development	Explore opportunities to further develop Curriculum for Excellence nature-based resources, and prepare new material on nature and nature-based solutions to be included in the Learning for Sustainability portal by 2027.	ADMG recognises the potential for the rural environment to provide cohesive and extensive opportunities to integrate the Curriculum for Excellence through place-based learning in nature. Affric and Kintail LMG has recently partnered with the Developing the Young Workforce initiative to provide opportunities for nature-based learning and skills development.
O	Embed biodiversity and nature in curriculum development	Publish an Update to the Climate Emergency Skills Action Plan by the end of 2023 to ensure it remains in line with our economic and climate ambitions.	ADMG fully supports the development of skills and the provision of training to ensure a future workforce that is adaptable to the emerging needs of nature-based and climate emergency employment opportunities. Consideration must be given to linkages with policy in terms of rural housing availabliity to support job opportunities in rural communities.
O	Mainstream and integrate biodiversity policy across government	Increase the effectiveness of mainstreaming biodiversity on land and at sea through: - The National Planning Framework - Agricultural Reform Programme - Climate Adaptation Programme - Land Reform Programme - Scotland's National Strategy for Economic Transformation - Climate Change Plan - National Marine Plan 2 - Progress by 2026, the mainstreaming of biodiversity including through the review of the National Performance Framework.	Biodiversity targets will be at risk unless there is integrated policy across different Government Departments and the Agencies.
M	Mainstream and integrate biodiversity policy across government	Develop our understanding within government and more widely of the application of just transition principles in moving towards a nature positive blue economy alongside net zero commitments.	Need to develop understanding of just transition principles to measurable and demonstrative application actions on the ground- particularly relevant for the deer management sector.