

Annual Review

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Photo: Laurie Campbell



Tom Turnbull, Chairman
Association of Deer Management Groups

ADMG has no option but to push back hard against proposals in latest deer management consultation

We are now starting to see the implementation of the Deer Working Group recommendations. The consultation *Managing Deer for Climate and Nature* proposes changes to deer legislation that will have significant implications for deer managers across the Highlands. The headline in the consultation is the introduction of new Deer Management Nature Restoration Orders (DMNROs) as a new form of regulation to be used by NatureScot.

ADMG has never been against the utilisation of existing regulations to protect habitat and prevent damage. An evidence-based approach, used in conjunction with deer managers, should be both appropriate and proportionate. But it is clear that in some circumstances the existing regulations are not working and can be both time consuming and clunky. The obvious step forward in our view therefore would be to review the existing legislation and where possible streamline it to enable action where required.

However, what has been proposed is a new layer of regulation. Restoration or enhancement will now be the triggers for intervention, with proactive rather than reactive intervention becoming the norm. Those who live and work in the Highlands will be more than aware that habitat recovery and change can be slow and often many years will go by with negligible results, sometimes even when herbivores are completely excluded. Restoration and enhancement are subjective concepts and with no need to demonstrate damage prior to being placed under any potential DMNRO will mean that the threshold for intervention may be down to the individual or agency enforcing them. Having met with Scottish Government and NatureScot our concerns remain, and we will be pushing back in the consultation and thereafter against the introduction of a regulation that we believe threatens voluntary collaborative deer management.

ADMG has been proactive in supporting improvements to biodiversity and we have no intention of being portrayed as climate change deniers. But we do want to be clear that as an organisation we believe that voluntary deer management is the only way to keep a sector that currently feels threatened both on side and motivated. Blaming deer managers whilst failing to improve access to beneficial projects and refusing to provide the support that other rural sectors receive is counterproductive.

Along with the DMNROs there are proposed changes to Section 10 of the Deer Act. The revised Section 10 would enable NatureScot (or someone they authorise) to enter land and undertake short term deer control. ADMG will be raising its concerns over this as this would empower NatureScot to bring about the equivalent to action under Section 8 of the Deer Act but without the checks and balances that are currently in place for Section 8. In other words, the step-by-step consultative process under which landowners have historically worked with NatureScot could be bypassed. ADMG has never been opposed to the use of regulation where it is necessary and we are not naive enough to believe that it won't be needed going forward, however, we feel that adapting Section 10, which is currently designed for short term emergency action, as a short cut to Section 8 regulatory action is draconian and unnecessary. If Section 8 needs some adjustment to make it more efficient to use where necessary then we would favour that rather than blurring the lines between two current powers.

Also, the proposed extension of the female season is in the consultation, and we are aware that this is a contentious issue for many of our



Restored peatland.
Photo: William Hawes

members on both sides of the argument. Whilst I understand frustrations for NatureScot in the bureaucracy involved in the authorisation process, it does mean that there is a record of when and where deer are being shot and by whom. Whilst the argument remains that while there is no compulsion to cull females later in the spring or early autumn, will that still be the case if you are part of one of the new DMNROs and therefore under pressure to reduce numbers regardless? I would like to see some evidence from NatureScot that proves beyond doubt that dependent calves would not be orphaned in early culling and I would ask them to demonstrate to Ministers what it is like to gralloch a heavily pregnant hind. I am confident that the legislation would not pass if Ministers and MSPs truly understood how distasteful many deer managers find it to gralloch females at this time of year.

The consultation alludes to incentives for deer management and incentives are one of the four workstreams of the Strategic Deer Board. However,

the consultation contains plenty of sticks but little more than a passing reference to carrots and it is very difficult to respond constructively to what is proposed when incentives are not detailed, they are apparently a work in progress. We can only conclude that deer are to be shot irrespective of the socio-economic implications. Whilst tree planting, peatland restoration, sheep grazing, hedge laying, and other rural practices are incentivised in the public interest, there would appear to be a blind spot when it comes to deer.

Funding we are told is tight and it is difficult to push deer management or venison to the front of the queue. However, agriculture has been promised £620 million per annum, the Forestry Grant Scheme for 2024 - 2025 has been cut by £30 million and there is a desire to increase Peatland Action spending, I am in all honesty baffled by the reluctance to provide some direct funding to deer managers who provide a service to government free of charge, as well as the removal of funding for the Forestry Grant Scheme, a flagship policy to tackle biodiversity loss.

I would urge Scottish Government to recognise what effective deer management through DMGs has already delivered through the voluntary principle and the collaborative structure that we have in place:

- Out-performing expectations on three separate rounds of assessments.
- Publicly accessible deer management plans with five-year population models covering 3 million hectares.
- Habitat Impact Assessments covering the vast majority of the Highlands.
- A comprehensive knowledge of culls and population data that is unrivaled in the UK.
- Successful collaboration that has evolved across the DMGs over more than 50 years despite increasingly diverse and potentially conflicting management objectives.
- Regular liaison with access groups on the National Access Forum.
- Pioneering landscape scale land management.
- A steadily reducing deer population across the upland open range due to culling as evidenced by the James Hutton Institute 2019 survey.

When you consider the public interest that is clearly delivered through Deer Management Groups, not to mention the work that is undertaken in the light of the climate and biodiversity crisis, it is a great shame that we in the upland red deer range, the very people who deliver deer management, should be the ones who are repeatedly the target of additional regulatory measures whilst deer populations elsewhere receive scant attention contrary to the recommendations of the Deer Working Group. My plea to Scottish Government is, don't throw the 'baby out with the bathwater' and threaten the voluntary system that already delivers so much.



Lorna Slater, Minister, addressing the 2023 Scottish Venison Summit.
Photo: Dick Playfair

Venison is an area of concern for all deer managers. ADMG in a joint letter with Scottish Environment LINK and Scottish Venison, proposed a venison subsidy as a means to incentivise the desired increase in the national deer cull, which is currently carried out at a net cost to producers. We were informed that funding was not available although there may be a pilot scheme put in place. Regardless of outcome we would still require a well-funded industry body to help market and promote venison to a wider audience.

At last year's AGM we discussed how ADMG might do more to support the work of Scottish Venison for which core funding is generated by a levy arrangement. The current levy is set at 2p per kilo and is only paid by some of those who supply two of the main venison dealers. In other words, under the levy system a small proportion of producers bear the cost of a trade and marketing association which benefits everyone in the industry. This is not only unfair but also does not raise enough for Scottish Venison to function effectively. Currently Scottish Venison runs on approximately £20,000 per annum but as a sector representative body needs considerably more than that for its core functions of representation and promotion.

As an industry we need to support the one organisation that is in a position to promote and grow the market for venison which is now such a key income stream for deer management.

I therefore am proposing that ADMG should make an annual grant to Scottish Venison. This would initially be met through ADMG reserves with the prospect of a small increase in ADMG subscriptions in future years specifically to support Scottish venison interests. This will effectively double Scottish Venison's funding and allow for more to be spent on promoting our product. We hope that there will also be supplementary funding from venison processors and from others in the sector including lowland producers and deer farmers.

Whilst I know that the costs of deer management have gone up considerably since the early days of ADMG I do feel as a producer myself, that we need to do more to create and secure the market for our product and while Scottish Venison continues to punch above its weight, as those who attended the November venison summit will confirm, much more is needed if culls are to continue to increase and if we are to expect a more realistic price for our product. I hope that this move will be supported by a vote at the AGM.

Dick Playfair and Richard Cooke will be able to update us on the recent work of Scottish Venison and the plans for the future. I understand that to some it will seem unfair that in effect the upland deer sector has been 'carrying the can' for the rest of Scotland's deer managers, promoting their venison sales for nothing. However, I believe that we need to take the lead and, as always, the Deer Management Groups should be ahead of the curve.

I have mentioned the letter that I signed with Scottish Environment LINK requesting a venison subsidy. This has been one of the positive outcomes from the ongoing Common Ground Forum. In a short time, the Forum has deliberately brought together historically opposed organisations and people from all backgrounds of deer management to better understand where we may actually share some common ground.

We know very well that we will not always agree with one another on everything but when we do have common ground is it possible to work together to achieve shared outcomes and where they differ to do so openly and respectfully? Julie Stoneman will be speaking at our AGM and has been chairing the Common Ground Steering Group from its creation nearly four years ago.

Professor Robin Pakeman from The James Hutton Institute will also be talking at the AGM about deer and their carbon footprint, which coincides with the publication of the SAC Consultancy report on this same subject which you can read about in SCOPE with links to the SAC work. This report was funded by NatureScot, ADMG, Scottish Venison and members of LINK.

Brodie Wilson from Scottish Government will also talk us through the latest consultation on managing deer for climate and nature. This will be your chance to raise any concerns you may have, or alternatively to voice your support for the proposed changes.

As I have mentioned on e-scope already, it is vital that you respond to this consultation that contains significant changes to deer legislation. It closes on 29 March.

Ever since the publication of the Deer Working Group Report in 2019, we have been waiting for the recommendations to be implemented. There is little doubt that the changes presented in this current legislation are far reaching and, in fact, go beyond the recommendations proposed in the report. Indeed, there are some surprising omissions including the need to improve the cull return system as a basis to better understanding of our deer populations across Scotland.

Lorna Slater, Minister for Green Skills, Circular Economy and Biodiversity, the Minister responsible for wild deer, states in the foreword to this consultation that 80% of the cull is undertaken by the private sector in Scotland.

There is no doubt that without the work that deer managers do in the Highlands then Scottish Government objectives will not be met. Compelling deer managers to undertake heavy culls without the assurance that socio-economic needs have been taken into account will not provide the reassurance that many deer managers want. We would far rather collaborate with each other and with NatureScot than feel we are being pushed into a situation that ignores the progress of the last 10 years and takes no account of business income and skilled employment.

Deer Management Groups will continue to undertake deer management that takes full account of the public interest and that responds to the climate and biodiversity crises. However, what we would like to see from Scottish Government is more recognition of progress, the facilitation of positive work and real incentives for deer managers. More carrot, less stick!



*Best Practice training day, Lairg.
Photo: UHI North Highland College*