

Response ID ANON-96DP-97VC-C

Submitted to Meeting our '30 by 30' biodiversity commitment on terrestrial and freshwater sites: consultation on legislative proposals
Submitted on 2024-05-13 11:44:26

Section one: creating flexibility for designated sites

1 In Scotland, protected areas on land work by identifying individual natural features to be protected on a site (e.g. habitats, species populations or geology). Should the Scottish Government allow protected areas to also be designated on the basis of important ecosystems (including interactions between habitats, which recognise the importance of transitional habitats), in addition to individual natural features?

Somewhat agree

Please explain the reasons for your response::

ADMG welcomes the proposal to review and improve our current system of designated sites, acknowledging the limitations and challenges of managing for individual features or species in a context of ecological change whether through the impacts of climate change, the spread of INNS or through features requiring different prescriptions, for example overgrazing or under-grazing. We recognise the value and wider benefit of healthy, functioning ecosystems and their role as natural capital assets in providing landscape scale services that support well-being, health and security through provisioning, regulating and cultural services. Underpinning these services are the fundamental building blocks of ecosystems such as the nutrient cycle, soil formation and habitat provision for biodiversity. In principle ADMG would welcome a landscape scale, ecosystem approach to protection and conservation where appropriate and indeed many of our members are already contributing considerably to this approach through the delivery of collaborative deer and land management plans and the aspirations of many to want to improve environmental condition of the land. Where we have concerns about this approach however is in the lack of joined up thinking within the Scottish Government with regards to the current rural policy framework. Future ecosystem health and the ultimate success of this approach will almost certainly be determined by the flexibility, adaptability and effectiveness of future agricultural, environmental and forestry policies and critically the synergy between them. Supporting land managers to make good land management decisions through incentives and facilitation will be absolutely essential. From a deer management perspective, ADMG is clear that support for sustainable deer management activities (culling, venison production, fencing where appropriate, provision of adequate access for culling and extraction in forestry planning) must be available where protection or enhancement of the environment is required. Critically, there still seems to be lack of demonstrable cooperation between Scottish Government silos in ensuring that future support systems underpin an ecosystem approach. Until this is resolved satisfactorily, increasing the use of regulation as an "enabling" mechanism is unlikely to achieve desired outcomes, and paradoxically may lead to reduced cooperation and collaboration from the rural sector. The pressures currently exerted on deer managers in the highlands are considerable however little is known on what is happening in the lowlands where information on cull returns, population levels or damage by deer are notably lacking. An equitable approach to deer management across Scotland is required if we are to protect designated features.

Section two: proactive management of protected areas and other important areas for biodiversity

2 Should the Scottish Government clarify the existing powers that require management and restoration of protected areas, to make it clear that this requirement also covers protected areas that are experiencing slow deterioration over a long period of time (e.g. invasive non-native species spreading over native habitats such as woodlands)?

Somewhat disagree

Please explain the reasons for your response:

The management and restoration of protected areas must continue to be underpinned by a range of appropriate incentives which are easy to access, readily available and which do not contradict each other through a mismatch in Scottish Government policy objectives, for example, previous minimum stocking densities for livestock being at odds with Scottish Government targets for lower densities of deer. The current provision for enhancement through Land Management Agreements as an initial step which are required to clearly set out what financial provisions will be made available to land managers is an important first step, which could be progressed to Land Management Orders if required. Previously they have provided the mechanism by which specific incentive packages can be made available to land managers, particularly where current funding support may not be available or appropriate. However, as we have pointed out in our consultation response to Deer Management Nature Restoration Orders (DMNROs) being proposed, we have significant concerns about the subjectiveness of the principle of restoration or enhancement being the trigger for regulation alone. We would therefore like to see greater clarity as to the detail of any proposed changes to the existing legislation and the mechanisms by which such proposals are carried out. These must be progressed in full consultation with land managers with a guarantee that adequate and appropriate incentives will be made available to land managers. As detailed above, this must include incentives for all aspects of deer management. A lack of clarity as to how DMNROs would be applied, over what scale and what the process would involve has led to considerable concern amongst our membership.

3 Should the Scottish Government expand the existing powers to enforce and incentivise management and restoration of protected areas, to cover other land in situations where it has been identified to have significant benefits to be achieved through nature restoration?

Disagree

Please explain the reasons for your response:

As stated above and through our response to Deer Management Nature Restoration Orders, ADMG does not support the use of regulatory action to cover “other land in situations where it has been identified to have significant benefits to be achieved through nature restoration”. We see this approach as being subjective, overly top-down, open to legal challenge and as discussed elsewhere, is likely only to lead to disengagement from the rural sector, from which the Scottish Government currently enjoys and benefits from significant private investment and voluntary cooperation. 80% of the deer cull is currently undertaken by the private sector, practitioners must be engaged and consulted adequately, or targets will not be met. ADMG fully supports the principles of landscape scale management, the benefits of ecosystem services and natural capital approaches. Many of our members are already delivering this approach through land and deer management plans. We advocate that the Scottish Government must work with land managers through effective, adaptable and complementary policy frameworks and a suite of agile and easy to access incentives to achieve the outcomes we all want to see in terms of future sustainable land management, which is multifunctional and productive, underpinned by a resilient, healthy ecosystem.

About you

4 What is your name?

Name:
Tom Turnbull

5 Are you responding as an individual or an organisation?

Organisation

6 What is your organisation?

Organisation:
Association of Deer Management Groups

7 The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response with name

8 Do you consent to Scottish Government contacting you again in relation to this consultation exercise?

Yes

9 What is your email address?

Email:
strone@btconnect.com

10 I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

I consent

Evaluation

11 Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:
Slightly satisfied

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:
Slightly satisfied

Please enter comments here.: