



23.7.25

Finlay Carson MSP,
Convener of the RAI Committee
The Scottish Parliament
Edinburgh
EH99 1SP

Dear Convener and Members of the RAI Committee

Natural Environment (Scotland) Bill - Deer Management. Final Business and Regulatory Impact Assessment.

I write to highlight concerns over the nature of the Natural Environment (Scotland) Bill - Final Business and Regulatory Impact Assessment (BRIA) - Deer Management. Whilst we appreciate and support the need for action in light of the climate and biodiversity crises it would appear that deer managers will foot the bill with little additional support from Scottish Government regardless of potential damage to business, reference to a just transition nor need for long term sustainability in the sector.

Please note that as an organization, we represent our membership who manage deer over 3 million hectares the Highlands. The Association of Deer Management Groups (ADMG) feels that the BRIA is speculative and unclear and does not take adequate consideration of the of consequences of the Bill for deer managers.

The BRIA refers to information from 2017 on designated sites and their condition that ignores the progress made by the end of the Deer Management Group (DMG) assessment process in 2019.

'The overall impression is of an improving picture of deer management in Scotland. Red deer populations have been stable since 2000 and there are early indications of an overall decrease in population density with marked reductions in some regions. In the uplands DMGs now cover a greater proportion of the red deer range, with significantly improved management plans and associated improvements in DMG performance' (Assessing Progress in Deer Management – Report to the Scottish Government from Scottish Natural Heritage September 2019.

<https://www.nature.scot/sites/default/files/2019-11/Publication%202019%20-%20SNH%20Assessing%20Progress%20in%20Deer%20Management.pdf>)

Whilst it is understood that the BRIA is trying to highlight why the Deer Working Group (DWG) was created it would appear that it is failing to refer (nor take into account) to any progress made after 2017. This includes increased culling, 2023/24 saw the highest cull recorded in Scotland, with 138,534 deer being culled compared to 113,442 in 2016/17. This increased culling, deer management planning and funding for collaboration has come at a cost to the private sector that is not reflected in the BRIA.

ADMG would appeal that decision making around the Bill be made using contemporary statistics on deer management, not those from 2017, and that the current lack of funding required to underpin sustainable deer management and support will be given full consideration.

Deer Managers are well aware of Scottish Government's policy *'to reduce the impact of wild deer on the natural environment so that they can form part of a functioning ecosystem while maximising the*

benefits deer bring to local communities and the rural economy'. Unfortunately, what is made less clear in the Natural Environment Bill or the BRIA is how deer reductions will be supported and ensure a just transition for deer managers who currently rely on deer management to help support employment in the sector.

We are pleased that the BRIA notes *'the various sectors and groups affected by the proposals, are already expending considerable time, effort and funds to deliver modern and proactive deer management'*. However, it is extremely disappointing that industry concerns in respect of the increased costs of deer management and fears for employment in the sector are not being taken into consideration in the BRIA. *'The Bill will have a limited effect on most owners and occupiers of land'... 'while there may be an increase in the amount of deer management they are undertaking, this will be progressive over multiple years.'* It would appear that there is an assumption that costs will go up, but what is not referred to is the fact that at the same time any income from deer management will reduce, be that venison or sporting

The BRIA then states that *'the proposals should have minimal costs and impacts on professional recreational, volunteer or fee-paying stalkers. If deer culls increase significantly, it is likely that there will be increased stalking opportunities for stalkers in the relevant locations.'* Scottish Government's position is seemingly only to consider the short term, not considering the long-term implications of less deer numbers limiting stalking availability leading to diminished income streams and reduced viability of businesses to retain deer management and employment opportunities. This shows a lack of understanding of deer management that should have been more apparent through proper consultation with practitioners. As an organization ADMG and others have consistently pointed out the potential costs of intensified deer management but this has clearly not been considered. We understand the need for increased deer management but fail to see where the support is coming from to enable this transition

Potential damage to deer management businesses as a result of the Bill are therefore considered a significant risk through higher costs (intensified culling and measures of compliance), changes in income (likely to be reducing over time), and the resulting implications for employment.

Those concerns amplify the need for the consultation process to deliver for a just transition, taking into account the long-term implications for staffing and employment, and need for both economic and social resilience for the sector.

The fears and concerns of deer managers appear to have been largely ignored through the consultation process and are not adequately reflected in this document. If deer numbers are to be reduced then support, facilitation and collaboration will be required. There appears to be no funding forthcoming for deer management incentives despite this being one of the four workstreams of the Strategic Deer Board, the body tasked with delivering the Deer Working Groups Recommendations.

Scottish Government rely on private funding to deliver deer management in the Highlands. In response to increased pressure from Government deer managers have increased culls in most circumstances and are starting to go further to deliver for climate and biodiversity, at scale, often underpinned by voluntary collaborative frameworks such as the Deer Management Groups. However, this BRIA raises serious concerns as to how increased culls will be achieved but most importantly how jobs and businesses will be supported in delivering those targets.

Within the BRIA it is noted that small businesses may need support through The Forestry Grant Scheme (FGS), Nature Restoration Fund (NRF), and Agri-Environment Climate Scheme (AECS). FGS applications are slow, expensive and cumbersome, NRF is competitive and prohibitively expensive and difficult to

apply for and likewise the costs involved and accessibility in applying for AECS means that applications will be limited. It is unlikely that these schemes will be sufficient to support higher culls.

We frequently hear of the need for deer managers to 'deliver' for climate and biodiversity. Disappointingly, this Impact Assessment neatly highlights the lack of understanding of what has already been delivered, what is at risk, through unclear and potentially heavy-handed regulation, and what is required to deliver a more sustainable solution to delivery of the outcomes sought for the environment, economy and people involved. We would urge the RAI Committee to engage further with practitioners and would be happy to help facilitate this. There is currently a real risk to the voluntary collaborative deer management on which so much of the Natural Environment Bill relies, and this is exemplified through the subjective nature of this BRIA.

In order to better understand the assumptions made in the BRIA we would request information on what financial modelling has been undertaken to assess as accurately as possible the economic impacts of the Bill. As we have outlined these assumptions will have significant consequences for rural Scotland.

Thank you for taking the time to consider this letter. Please do not hesitate to contact me should you have any questions.

Yours sincerely

Tom Turnbull

Chair, Association of Deer Management Groups