

Tom Turnbull, Chair, ADMG

Address to AGM, 25 March 2026

Firstly, before I start, I would like to thank you all for taking the time to be here. I would also like to thank our sponsors Lycetts, please do take the time to speak to their representative Alex McGrigor who is a very keen stalker, member of ADMG and Inveraray and Tyndrum Deer Management Group, and also our lunch sponsor Highland Game.

I had hoped to stand here in front of you today with largely good news. Finally, I thought we had reached a point at which we had some clarity about what the future holds for deer managers. But now I believe that much of the hard work of the last year is at risk. It looks as though once more the deer sector has been taken for granted. But I will come to that a little later in this address.

I had hoped that we would have reached a point at which we have some clarity about what the future holds for deer managers. It seems like a long time ago— at the start of 2020—that we received the 99 initial recommendations of the Deer Working Group Report, which set the wheels in motion for the Natural Environment Bill, which has now received Royal Assent.

On reflection I think that whilst at times we have been more than a little surprised by some of the proposals and amendments in the Bill, I believe that we have also been able to positively influence the final Bill.

The Managing Deer for Climate and Nature consultation contained the proposal for Deer Management Nature Restoration Orders, which were subsequently dropped. However, the new Section 6ZB of the Deer Act will still enable NatureScot to intervene in order to facilitate nature restoration and enhancement despite our repeated protestations.

ADMG is not opposed to regulation or habitat improvement and it has never been our intention in this Bill to prevent NatureScot from acting where necessary. However, as I have stated regularly, the scope and application of NatureScot's new intervention powers remain ambiguous. Unless these powers are applied judiciously, they will cause dispute rather than foster collaboration. Nevertheless, we were pleased to see the back of the DMNROs and we will be involved in further discussions through the creation of a new code of practice to represent our members where necessary.

The implementation of the Bill will largely rely on the development of a new Code of Practice for Deer Management. ADMG is actively engaged in ongoing discussions regarding this updated code, which will incorporate provisions for new intervention powers. ADMG will continue to contribute to the formulation of this to ensure that it

reflects the concerns of our members and we will push the need for collaboration, deer welfare and sustainable deer management.

The Act includes a National Deer Management and Venison Plan that I hope will provide clear strategic priorities for government and deer managers. Importantly there will also be support for the venison sector with Jim Fairlie Minister for Agriculture and Connectivity stating, *"I want to see venison at the heart of our approach to deer management, and the provisions in this Bill will help us maximise the opportunities this can bring for rural Scotland."* Whilst we support in principle the National Deer Management and Venison Plan, this should not be an opportunity for Scottish Government to delay immediate much needed support for the venison sector.

ADMG has been the lead funder of Scottish Venison for the last 2 years, many positive steps have been taken and it is clear to me that all the parties in Holyrood are now aware of the need for a buoyant venison sector, and for venison to be more widely available, this will I hope be reflected in the new National Deer Management and Venison Plan.

As many of you will be aware during Stage 2 of the Bill, a contentious amendment was introduced that aimed to broaden occupiers' rights regarding deer management. This proposed change raised safety concerns and potentially threatened to impact collaboration and sporting enterprises. Nevertheless, discussions with the Scottish Government, following input from our members, have resulted in an agreement to hold further consultation. These, we hope will establish a transparent procedure ensuring all stakeholders are informed about the required steps preceding any intervention by an occupier. Oversight is expected to be provided by NatureScot. As reiterated a number of times by the Minister, this measure is not intended to allow occupiers to 'harvest' deer but rather provide a backstop where necessary.

During a meeting on 11 March with the Minister, ADMG emphasised the need for clear guidelines in both the code of practice and for occupiers and tenant farmers. We highlighted the importance of having precise guidance and procedures, ensuring landowners have the opportunity to act in a timely way before occupiers undertake any deer management. This clause in the legislation is potentially divisive. We have requested that deer management and agricultural practitioners are integral part of the discussions. ADMG will be involved throughout the process.

One of the most notable aspects of the Bill process was the number of times that Ministers, MSPs and the Committee referred to the need for collaboration, to ensure that deer managers were listened to and the need for a thriving venison sector. This I believe largely came from the work that ourselves and others have been undertaking through the Common Ground Forum which enables us to go to Holyrood with a joint voice on a number of topics including venison, incentives and the need to maintain

employment in stalking. This project has been of huge benefit to the sector, and as a result we held a fundraising event in London at The Fishmongers Hall to ensure that the Forum has the funds to continue, and I would like to thank everyone who has pledged their support so far.

So, with the Bill receiving Royal Assent on 12 March but with still much to play for, you may imagine that we have enough to deal with. However, the 'cherry on the cake' was the announcement within the recent Scottish Budget that the Small Business Bonus Relief Scheme would no longer apply to 'deer forests.' It was clear from the outset that this was a poorly conceived mis step by Scottish Government that would disincentivise and penalise deer managers. I was then pleased to be able to tell members on e-scope that due in part to pressure from ADMG this had been amended and that the new guidance would now state that SBBS would apply to:

'Deer forests on which shooting rights are exercised solely for the purposes of environmental management or for preventing damage to woodland or to agricultural production, or a combination of those purposes, and any deer shot are made available for human consumption as venison.'

During our meeting with Jim Fairlie on 11 March, we had sought clarification regarding eligibility for relief. Mr. Fairlie and civil servants in the room confirmed (as they had previously done in an exchange of emails) that individuals harvesting deer for the purposes of environmental management and intended for human consumption would qualify for relief and this would not exclude deer shot by sporting clients.

You can then imagine my anger when I received an email from Argyll and Bute Council entitled, Small Business Bonus Scheme - Shooting Rights & Deer Forests. I clicked on the link to the application form for Small Business Bonus Relief and read the words,

'If the activity also includes sporting or commercial shooting, SBBS relief will not be available'.

It would appear to me, that yet again the deer sector has been used as a political football. I have spoken with Civil Servants and NatureScot since receiving my SBBS application and they do seem surprised by this turn of events. I wasn't surprised, I was angry but not surprised. This is emblematic of how we are treated time after time by a government that deliberately fails to understand deer management. I am afraid that this merely confirms my suspicions, that deer management policy making is not only incompetent but treats the sector with disdain, whilst simultaneously relying on private time, good will and investment to deliver on their behalf.

Since the start of 2025 I have attended over 100 meetings for ADMG, many with civil servants, politicians and NatureScot. I go into these meetings in good faith that we

will be taken seriously. At many of these meetings I am there to represent deer managers as Scottish Government consider how they will meet their ambitious targets for climate and biodiversity. But time after time despite their reassurances, Scottish Government squander the good will of deer managers.

ADMG will continue to pressure government on this issue, however, I am starting to believe that we need to be stronger, more forceful and, dare I say, less collaborative in our dealings with government. Please give this some thought because I will be asking for your views later in the meeting.

I hope that despite this ludicrous situation with SBBS, I have demonstrated the value that ADMG provides to members and I firmly believe that without the hard work of the team at ADMG we might be in a very different place. As an organisation we can have open and honest discussions with NatureScot and Scottish Government and provide a buffer where the decisions are perhaps at times, questionable. We have had some small victories throughout the Bill process. Whilst the political goalposts shift all the time, DMGs should be very proud of what we achieve and what we represent; we are often far more progressive in our approach than we are given credit for and have pioneered collaborative land management in Scotland.

It has been an extremely busy year and there will be no let up as discussions around the Code and the outcome of the Bill continue. I would like to take the time to thank the ADMG team for all their support and for countless hours of work that largely goes unrecognised.

But despite the progress that we make, I sadly must report that our subscriptions are dropping, some Groups have fallen by the wayside, whilst others merely pay a fraction of what is owed. There is a real danger that ADMG becomes a victim of the shifting goalposts of government. Deer managers clearly feel disillusioned, and who can blame them? I am sure that Finlay will expand on this, but the bottom line is that we can only be here for as long as our members want us.

The constant changes in government policy and regulation have created an atmosphere of uncertainty with some fearing for their livelihoods.

This sense of instability has contributed to a noticeable decline in morale, and at times engagement, with some Groups struggling to justify their continuation. If this trend persists, it threatens not only the financial viability of ADMG but also the collaborative approach that has been cultivated over 30 years.

From the Common Ground Forum to the Deer People fund, improved visibility of venison, progress in parliament and a better voice for stalkers, we do all have a lot to be proud of. The work undertaken through these initiatives has not only fostered greater collaboration among deer managers from varying backgrounds but also raised awareness of the sector's vital contributions to environmental management and rural economies.

Looking to the future, the importance of collaboration between landholdings and deer managers will only grow. Deer management is only going to become more challenging. Whilst there are still political hurdles in the coming months, we need to maintain focus on the day job, the politics of recent years have been an unwelcome distraction and the sooner we get back to talking about the practicalities of deer management the better. We can't risk losing momentum and for all Deer Management Groups it is important we continue to do what we do well – delivering sustainable deer management, collaboration at landscape scale and maintaining the highest standards in deer welfare. Please continue to support us as we try to protect your interests.