

SGA Deer Vision

The 10 years ahead

‘valuing Scotland’s national resource’



A high quality, resilient environment *how we get there*

Background

- The Native Woodland Survey of Scotland (NWSS), which assessed sites up to 12 years ago, found exactly one third of native woodlands in unsatisfactory condition due to grazing by herbivores (deer and livestock, depending on location). In almost equal measure (but at slightly **higher** levels) non-native trees and invasive species were cited as the other principal threats to native woodlands.*1
- Of 1606 natural features impacted by herbivores, 75 percent were in favourable or recovering condition. In the case of native woodlands, two thirds were favourable or **recovering due to management**.
- The NWSS showed that, in Deer Management Group areas, there were **70 percent of sites with low to medium herbivore impacts**, a much better picture than the rest of the country.
- From the 2007-2013 round of SRDP applications: 59 percent of all woodland creation took place within Deer Management Group areas, including two thirds of native woodland planting and 76 percent of all native woodland regeneration at that time.
- This may seem contrary to perceptions. There has been a view, particularly in reference to the highland red deer range, that woodland creation is ‘sacrificed’ for deer. Facts, as shown, prove this to be a simplified narrative. Moving forward, substantial new incentives for forestry schemes will mean even more woodland in deer management group areas.
- **Broadly half of the native woodlands classed by NWSS as unsatisfactory due to herbivore impacts were in the lowlands, with 55 percent outside the main deer range.**

- To summarise, there are a number of issues affecting Scotland's woodlands today. If we are to improve their condition, each needs to be addressed. We also need to acknowledge the many achievements of good deer management to date.

1* The SGA understands surveyors on the NWSS were told to attribute all grazing damage (that they could not distinguish) to deer. The influence of other herbivores was not given comparative weight, therefore, and the resultant findings give only an interpretation of the real picture of deer impacts compared to other herbivores. The NWSS was developed by Forestry Commission Scotland to help guide policy development for forestry.

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As Scottish Government sets further targets for forest cover, as a response to climate emergency, this will have implications for deer managers.

Whilst some in the SGA are employed in sporting provision primarily, others are managing lowland roe deer. Some are managing in Scotland’s forests, where Sika and Fallow are found. Some are recreational deer managers, controlling deer around farms, infrastructure and on the fringes of major population centres.

The SGA membership, between them, have been responsible for the control of around 1 million deer of all species in Scotland in the past decade; many solely for habitat management reasons. Their work takes place over 7 million hectares of our land.

If Scotland is to achieve a high quality, resilient environment, these skilled men and women will help deliver it.

*Financially, this skilled workforce may be worth up to £10m annually to Scotland. *2*

For Scottish Government to make the best use of this trained (largely free) resource, for the delivery of public goods, these deer managers will require

- A voice that is listened to, with their knowledge valued
- Access to information they trust (reliable counts, objective-focused impact assessments), written in plain English
- An ‘all-herbivore’ approach to site-by-site assessment
- Appropriate timescales for delivery
- A big picture view: ‘all land, all species of deer’

In 2019, this is not always the case, as Case study 1 (below), shows.

*2: Estimate based on comparison with FCS cull figures/deer management costs (£6.9m) submitted to SNH Review of Deer Authorisations, 2016.

Case Study 1: Assynt and local knowledge

Designated woods at Ardvar in Assynt were deemed by SNH, in June 2017, to require a statutory deer cull order to protect them. SNH staff demanded Assynt Crofters Trust, and other landowners, cull large numbers of deer. They claimed the woods were not regenerating and the site was unfavourable. Crofters argued trees had been regenerating for decades. Impasse reached, they called for re-assessment.

When independent expertise was enlisted, outside of Scottish Natural Heritage (SNH), they found there had been a 'fundamental misrepresentation of the site,' arrived at using *inappropriate survey methodology*. SNH withdrew the statutory order.

Cull targets, fencing and monitoring were agreed. The 2017-2018 cull target was met. In 2019, site condition targets are currently being exceeded.

Assynt cost the tax payer £1m. The local community paid costs to fight their own case, frustrated SNH considered their land to be 'mis-managed'. Their human suffering, and the toll it took, was never evaluated.

Looking ahead, deer managers want their practical knowledge embedded in deer management decision making. They want their voice listened to.

SNH, today, has a small Wildlife Operations department due to budget cuts. In Assynt, there was a feeling those from SNH tasked with dealing with the community had little or no practical deer or woodland management experience.

In the end, **Local knowledge**, allied with a **trusted evidence base** (sourced independently of SNH) unlocked the impasse.

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On some sites where improvement is sought, deer may be the obvious problem and action can be agreed. However, on others, deer may only be part of the issue. A black/white analysis of ‘too many deer’, doesn’t work, yet this is often the prevailing narrative in Scotland, illustrating a lack of nuance in the national debate.

Whilst herbivore impacts in forestry can be assessed with some accuracy, care must be taken over open hill and moorland habitats. Forestry objectives are clear: to produce more trees. Open habitats are often less so. What are the objectives? What are the assessments actually showing? How are the goals for these habitats set out, by whom and for what purpose? SNH has, itself, acknowledged it may be very hard to devise management that will maintain all habitats in a favourable condition, even where grazing conflict exists between the same vegetation types.

If, on complex sites, the problem is wrongly diagnosed or objectives are unclear, merely reducing deer *numbers* will not guarantee less impacts.

Deer will also prefer some habitats over others, within the same site. This can mean high grazing impacts on some features but little or even no impact on others.

Professor Steve Albon and Dr Justine Irvine of James Hutton Institute wrote, in evidence to the ECCLR Committee in 2017:

“Where plant communities with contrasting grazing sensitivity to, or requirement for grazing to maintain them, exist side by side, there is an inherent conflict in managing for the conservation of both.”

There is also a need to acknowledge the role deer play in natural vegetation control. Under-grazing can actually lessen resilience in some habitats (and biodiversity). Deer play an important role in fuel load reduction, making some habitats more resistant to wildfire.

Case Study 2: Caenlochan and an all-herbivore approach

In 2003, estates involved in a voluntary Section 7 deer control order at Caenlochan were told to reduce the deer population from 11 000 to 4600 within 3 years. The timescale proved too difficult to achieve due to health and safety considerations, with concerns, also, for animal welfare. A further year was granted.

Since 2007/2008, thousands of hinds have continued to be culled yet the impacts on the protected alpine plants remain high.

Deer cull effort in 2018/2019 delivered the highest culls since SNH went onto the site with controversial helicopter-assisted culls in the mid-2000s.

Culling effort is not the sole issue, therefore, although there has been an ongoing debate over its role.

Sheep and mountain hares also graze the area yet no substantive effort has ever been made to quantify relative or cumulative impacts of deer, sheep and mountain hare grazing.

One location - experiencing very high grazing impacts in 2018, close to the protected Site of Special Scientific Interest (SSSI)- was also shown to contain the highest mountain hare densities in the region.

To improve environments in years ahead, all impacts on sites need to be weighed and evaluated and all herbivore impacts investigated. It must also be acknowledged that there is no one-size-fits-all template which can be rolled out. Objectives must be clear and local knowledge must play a part in assessing them.

Realistic timescales and the role of fencing

As well as an ‘all herbivore’ approach, deer managers believe realism must play a part when it comes to **timeframes for habitat restoration and woodland regeneration.**

With less fencing being erected in the red deer range, habitats can take much longer to recover, *even if management effort has been escalated.*

Short term fencing in some areas would lead to a quicker response and deer managers believe fencing should not be devalued as a management tool, particularly in establishment phase. If climate response means more trees, we need to be using all tools to protect new plantations in early growth phase.

In some unfenced forestry schemes, for example, deer are having to be killed all year round, using out- of- season licences from SNH, to try to achieve regeneration. This regeneration does not happen overnight. In some circumstances it can be highly variable, even after decades. Timeframes- and expectations- must be realistic.

These reduction culls can have significant impacts on neighbouring objectives and welfare implications for deer which are being targeted in bad weather and poorer bodily condition, worsened by stress.

Similarly, targets can often be arbitrarily moved or imposed, demoralising deer managers.

Some landholdings have ambitions of woodland creation at montane heights, without fencing. Schemes such as these may take centuries. They also require major access roads on mountainsides, accommodating deer extraction.

Scotland's mountain habitats are dynamic. Weather and climate are changeable. At 2000 to 3000 ft, growing seasons only last a few months. Expectations should take account of our landscape and climate, particularly where fencing is being phased out.

Shared responsibilities

Looking ahead and to the goal of a resilient environment, deer managers also want people to take a **wider view** of deer management, encompassing all Scotland, all species of deer.

Fixating on the highland red deer range will see continued improvement in one area while our environment requires attention in many, as demonstrated by a recent review into lowland deer management.

If Scotland is to achieve nature goals, significant landowners must engage in deer management.

Presently, only 4 local authorities from 29 (where deer are a factor) are involved in any form of deer control, despite having responsibility under the Deer Code. Management, if undertaken at all, is usually reactive. Single problem, single response, yet all of these 29 councils have deer on their land.

Some of these councils are in major population centres, where territorial roe deer are causing increasing environmental impacts.

Still, blanket 'no cull' policies are adopted by some councils (Glasgow has a no deer cull policy, along with North Lanarkshire; 2 areas accounting for almost 1m residents) with councils fearful deer control will be too tough a political 'sell' to constituents.

Whilst there is some sympathy for this view, perceived public perception should not be allowed to dictate Scotland's wildlife management policies.

If councils are not managing deer, the responsibility falls to someone else, often SGA members. As national and local authorities aspire to more green space, this habitat will attract more roe deer.

The job will get harder.

Deer vehicle collisions on roads, for example, are reducing in the uplands but increasing in the lowlands. Over 90 percent of deer vehicle collisions in Scotland are now related to the lowlands. *3

In the interest of progress, practical deer managers would like to see a countrywide analysis. In 2019, this is not happening.

When Scottish Government conducts its deer review in 2019, around 40 percent of Scotland's deer range will **not** be analysed against performance indicators.

Why?

This includes large tracts of public ground on the National Forest Estate as well as SNH-owned land (Isle of Rum, containing features in unfavourable condition).

Despite problems with hybridisation between Sika deer and red deer, there is no deer management group covering a hotspot in Mull of Kintyre, north through Lorn to Oban (including Knapdale). Large tracts of Angus, Moray, Aberdeenshire and East Ross are not covered by a deer management group.

In the review, it is only the deer management group ground that will be assessed yet much land in unfavourable condition lies outside, including land in state ownership.

In total, hundreds of thousands of deer will not be assessed by the Govt's 2019 review.

If we want to improve native woodlands, all factors must be assessed. The same scrutiny must fall on state *and* private land.

There is a need, now, to acknowledge deer are often present as a direct consequence of some government objectives (urban greening, tree planting and regeneration) and not in spite of them or as a barrier *to* them.

A mature, joined up, assessment is required. Not a myopic focus on red deer in the north.

*3: Lowland Deer Panel, Report to Scottish Natural Heritage, Feb 2019.

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Cost effective deer management for Scotland *a new approach to our national resource*

Background

To make something more cost effective, you need to reduce costs, maximise benefits and derive greater value.

Looking to the future, deer managers would like to see Scotland’s people benefitting more from the nation’s deer ‘asset’, the same way we benefit from other resources.

This means re-assessing the potential of the end product, venison, but also re-evaluating how we are managing that asset, today.

- Scotland is home to sustainable populations of red, roe, sika and fallow deer. This means a sustainable supply of healthy, lean, flavoursome meat. Venison is wild. Its journey to the plate involves minimal travel. It contains more protein and minerals than beef, less calories and fat. In an age of environmental consciousness, it is a low input, high return, protein.

- Despite owning the asset, Scotland sends a significant percentage of its wild venison out of the country (particularly roe) while a significant, but lessening, percentage of the venison we eat is imported from New Zealand - a journey of nearly 11 500 miles.
- Obesity is a public health concern in Scotland; the nation's biggest cause of preventable cancer after smoking. In summary, we have a resource of low fat, nutritious food in our fields and hills. Are we making the wisest use of that resource?

Taking responsibility for maximising this resource means assessing how we manage and value that resource, today.

Mintel predicts game meat sales in the UK to reach £143m by 2020, with venison being the key driver. The potential is recognised by food market analysts.

If we are to achieve that potential, we need to offer the consumer the best. To achieve the highest standards, deer managers require the relevant skills and meat hygiene accreditations. They also require access to fit-for-purpose, chilled game larders and good communications with game dealers to arrange for timely uplift of carcasses; something which is not always happening in 2019.

There is more can be done, here, by all, and the SGA will work with Scottish Government and partners to ensure we get this right.

Many private estates in Scotland have invested in fit-for-purpose, chilled larder facilities with good air flow which avoids spoiling the end product.

There has also been government investment in larders for Forestry and Land Scotland deer managers.

Standards are not universal country-wide, though. A step change is needed and, in time, the SGA believes all larders will require to be chilled to ensure food safety and quality. Preparation areas, where deer can cool overnight before being placed in the chill next morning is also good practice, ensuring carcass quality.

Only by focusing on the end product and working back from there, will standards rise. This is what the SGA seeks.

Access to chill facilities

In some areas, particularly urban and peri-urban areas, deer managers have poor access to chill facilities or no access at all.

This has negative implications for developing local venison markets, something the SGA feels is essential as we look for 'win-wins' moving forward.

The SGA welcomes (and has been an active participant in) Scottish Government's Venison Strategy, and hopes to encourage targeted public investment in larder/processing facilities (see our Pilot scheme concept later in this section).

Lack of access to such facilities does not only have implications for venison market growth. It also has implications for lowland deer management. In our lowlands, impacts from roe deer populations are being seen in woodlands, on farmland and on roads.

If deer managers cannot use the end product, this is a barrier to active management. This, in turn, leads to more deer impacts. The two are intertwined.

As stated, market growth means delivering the best meat possible.

The SGA and others have been in dialogue with Food Standards Scotland to get the training, hygiene, lardering and processing right.

But this is not the whole story.

***Night and out-of-season control licences:
last resort or first?***

Some methods by which we manage the deer resource do not lend themselves, by nature, to the finest end product. This could hamper attempts to make the wisest use of the resource we have.

For example, in the last decade, more and more deer are being shot on state owned forests outside of the legal closed seasons and at night, in darkness.

Closed seasons were put in place in Scotland to protect dependent young whose mothers might be shot. The shooting of deer at night is illegal in many European countries for welfare reasons; nations which have a higher percentage of forest cover and high deer populations.

In 2017/2018:

21,861 deer were culled at night in Scotland, a 37 percent increase from a decade ago, when 6052 were culled. That same year, 16 percent of all red deer shot in Scotland were shot out of season, the highest number in a decade.

In 2018/2019:

370 night shooting licences were granted by SNH, the highest ever recorded.

641 separate licences were issued, out of season, with 520 of those being for the protection of woodland. *4 (source) SNH cull return figures.

Forestry and Land Scotland argue they need to protect the tree crop from damage all year round, and at night, whenever it is deemed that damage is happening.

In 2014/2015, they controlled 59% of their deer out-of-season and at night using licences obtained from SNH. *5 (source) FCS submission to SNH Review of Deer Authorisations, 2016.

Charitable NGOs also make use of these lethal control licences to protect trees where the recognised mitigation solution of fencing has not been tried.

Whilst the SGA acknowledges there are circumstances where out-of-season and night control licenses are necessary (and there is no one single solution to fit all cases, particularly in forestry) our practical deer managers feel the status of these licences, in 2019, has shifted from 'last resort' to 'first resort' on some state-owned and NGO land.

In some cases, deer managers tied to public contracts can download forms from a computer to enable them to manage deer in darkness, with minimal oversight, potentially leaving authorities open to future legal challenge.

In our view, this is an admission something is wrong with the way we manage deer in state forestry, either through poor initial forest design, cuts in full-time ranger staff, policy decisions to reduce expenditure on fencing or a combination of all of these factors. Whilst The SGA sympathises with budget constraints, members feel there needs to be a root and branch assessment of whether out-of-season authorisations and night licences are delivering the best management on public ground or just the cheapest. Local deer management groups should also be informed of any applications for such authorisations.

Despite heavy reliance on these licences, woodland/forestry remains the most impacted land type in Scotland today.

There are also genuine concerns contractors are being used to shift legal responsibilities (for Health and Safety or Food Hygiene) from the state, with all liability being shifted onto the shoulders of privately contracted individuals. This places a burden on the contractor. It also has implications for ranger employment.

What does all of this have to do with food?

There are three reasons why the SGA feels such a comprehensive assessment (of night and out-of-season licences) should take place, as we look towards 2030.

- Implications for the end food product
- Animal welfare
- Population dynamics

Food:

To recap, the SGA wants to encourage all meat presented to the game dealer, restaurant or butcher to be quality.

The best quality venison is in season, when deer are in peak condition.

When deer have been targeted day and night (made possible by night and out-of-season licences) stress hormones mean an inferior end product.

Carcass extraction in the darkness can also have implications for meat quality as the deer manager may have to drag deer from the forest floor in light which is insufficient to see what is around in the environment to spoil the product.

Animal Welfare:

Legal closed seasons were put in place to protect animal welfare. Animal Welfare is a priority in Scottish Government's recent Programme for Government.

Practical deer managers know selecting deer to be managed, in darkness, is more problematic than in daylight. It increases the potential for dependent young to be orphaned; the principal reason for the closed season.

There is also greater potential for wounding animals in darkness. On state owned land, managed by Forestry and Land Scotland, no data is kept on wounding rates so actual figures cannot be obtained for public forests.

The SGA was instrumental in developing Wild Deer Best Practice. Our members consider welfare to be a paramount consideration when managing deer in any setting.

The SGA has opposed helicopter-assisted culls due to the stress placed on deer, already in poor condition due to weather. The SGA will not endorse a roll out of this practice but recognises the value of helicopter deer counting.

The SGA is also seeking clarity from public agencies on future use of night vision and thermal imaging equipment in the shooting of deer, aware there may be welfare, human safety and wildlife crime implications (making illegal poaching easier).

Population Dynamics:

Greater cull effort does not always mean less grazing impacts.

On some state owned ground, where night and out-of-season licences are operational (and high numbers of deer have been taken), damage has not reduced.

Why?

Sometimes, there needs to be a re-assessment of the 'numbers game'.

As well as using night and out- of- season licences as a principal tool today, Forestry and Land Scotland also employs a significant number of trained contractors to carry out deer management; roles previously carried out by full-time rangers. There are now less rangers employed on the public estate (in 2014/2015, 100 contractors were used compared to 43 rangers).

Contractors are paid for each animal taken and can be brought in for specific tasks, short or longer term.

The SGA membership comprises contract deer managers so understands the practical issues of selecting deer in darkness, rather than in light, and targeting specific areas being damaged.

One deer manager, with considerable Forestry Commission and night shooting experience, said:

“As a contractor (paid by animal taken) you will take deer where you can. You cannot blame anyone for doing that and the SGA has no issue with the contractor. It is the way these contracts are written. But it may not be where the problems are, necessarily. In some forest areas, problems are growing. You will take deer on the upper forest edge where the trees are small or in the thicker timber where they creep out in the dark. You will shoot 5 on the upper edge of the forest in the dark before you sit in a re-stock wood and shoot the 1 causing the damage.”

Some years ago, in Loch Lomond and the Trossachs, a decision was taken for a large scale deer reduction (to 4 per sq km), with impacts to forestry being recorded. Despite heavy culls, impacts remained high. The benefits expected, from large scale deer reductions, were not delivered.

Whilst SGA supports trained contract stalkers and their competence, the combination of night licences, coupled with the payment-per-animal model, may not ensure the right animals are being selected to minimise damage.

Is the public purse paying just for the shooting of deer, or the selection of priority animals, aided by the ability to select better in daylight?

Awareness of population dynamics is key. If mature males are being shot at night, this can skew social structures. Group sizes can go up, leading to more damage than that caused before, by smaller, more dispersed groups.

In the Central Belt, where territorial roe deer are the main species causing impacts, it would be more beneficial, in reduction culling, to target 100 females in season than killing males out of season and in the dark- females dictate the population. Focusing on males will make minimal difference, yet this approach persists.

Similarly, if deer are shot out- of- season from November to April 1st in these areas, this misses the key time in May when young roe deer are taking up territories and causing impacts; filling voids created by shooting through the winter.

Today, deer shot in state forests primarily go to one large, established game dealer, with the benefits of the local resource moving out of the local area. A significant proportion of this venison will be exported, with little opportunity for local market growth.

So, what is the public and local communities gaining from the circa £7m a year spend in deer management in state-owned forests?

Poorer quality venison entering the human food chain, less local ranger employment, no healthy venison being used locally, welfare implications for the deer themselves and, in some cases, still high levels of woodland damage.

Is there an alternative which would deliver greater cost effectiveness, better quality venison, the development of local markets and greater local opportunity arising from the deer resource?

We think there is. (See Pilot Scheme, below).

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Pilot Scheme: Central Belt Scotland.

The SGA would like to work with Scottish Government to deliver a pilot scheme to evaluate alternative ways of managing the deer resource.

This fixed term scheme would take place in the Central Belt where roe deer impacts are rising.

The SGA proposes that Forestry and Land Scotland gives an area of state forest for deer management (where impacts have been robustly assessed and criteria for improvement agreed) by way of a permission.

These permissions are relatively commonplace although the number of them, sadly, has decreased by 25 percent recently.

At present, there is estimated to be around 2000 recreational deer managers in the Central Belt, trained to SNH requirement. This resource is, presently, under-utilised.

Recreational deer managers are not paid. Instead, they are able to use the resource, venison, for friends and family. They also pay Forestry and Land Scotland for the permission.

Instead of importing contractors into the Central Belt area, using payments-for-animal which can be around £100 per deer, the SGA proposes that local trained recreational deer managers are enlisted, under supervision of Forestry and Land Scotland rangers and with best practice and insurance offered by The SGA.

By targeting deer in daylight, using selection skills, deer would be managed - and management targets achieved - without the use of night or out-of-season licences, unless these licences were deemed a necessary last resort.

This would create local opportunity, reduce burdens on the tax payer, lessen welfare concerns and ensure the best quality venison.

Instead of the venison heading out of the area, opportunities for local market development would be opened up through the provision of a chill/processing facility.

As previously stated, many lowland deer managers have no access to larder or processing facilities, which acts as a disincentive to deer management and the development of markets.

The SGA would like to work with Scottish Government in order for a chill facility to be made available, even for a fixed term, where venison can be processed, using the correct quality control processes, for use in local markets.

This may be through establishing a community company and seeking community or enterprise funds this way. The facility would be operated by a qualified butcher or other appointed facility manager as a guarantor that the appropriate standards and quality controls would be observed.

The SGA counts, within its membership, deer managers from South Lanarkshire who have supplied venison to local food banks, charitable causes and for community nature events in East Kilbride.

This has enabled local people to sample high quality, in-season, venison where, before, that opportunity would not have been possible unless they were to pay high prices at a supermarket.

There would also be opportunities to develop supply with local butchers and restaurants in what could be an un-tapped market for local, sustainable, healthy protein at affordable prices.

In summary, the objectives would be:

- to demonstrate that deer can be managed by an available resource of trained, recreational local deer managers, under supervision, working to a target set against agreed criteria for assessing impact.
- to demonstrate this work can be done so that night and out-of-season licences are the exception rather than first option.
- To demonstrate sound management, with deer welfare at its heart, and to use the scheme, also, to educate about deer around towns and cities, and their management.
- To demonstrate that, through minimal investment (£30 000 to £100 000) in larder and processing facilities, the potential for greater employment could be unlocked, ensuring venison is eaten in the area from which it comes, increasing the value of deer to the local community.

This pilot scheme would be a delivery model for many Scottish Government objectives.

Across Forestry and Land Scotland properties, the SGA also believes there now exists an opportunity for more cost-effective deer management which also helps to meet the wider added aim of healthy ecosystems and enhanced species diversity.

This could be achieved by

- employing a pool of young, trained rangers across regions to act as general wildlife managers, helping conserve threatened species by managing other abundant predators such as foxes, and not just deer.
- Off-setting any additional costs with greater use of trained recreational deer managers and by offering more commercial stalking on public land, guided by FLS staff, reducing reliance on expensive contracted deer management. (In 2014/2015, only 11% of the cull on the National Forest Estate was undertaken by recreational deer managers).

If this pilot scheme cannot be delivered on Forestry and Land Scotland ground, it could also be considered on Council ground or nature reserves.

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Enhanced social well-being

the benefits of the vision

The development of local markets will encourage creativity when it comes to how venison is used, marketed and enjoyed locally, which fits modern demand and lifestyle.

Not everyone will be confident to cook with saddles and haunches. However, easy game pies, burgers and sausages could become a ready family staple. Sustainable, healthy, locally sourced, locally managed.

The Principles

what will guide us?

- **Deer Welfare**

Welfare must be at the heart of what we do.

This will mean returning night shooting and out-of-season licences (to kill deer all year round) to the status of 'last resort'.

The SGA proposes that those seeking a licence must meet criteria determined by an SNH site visit and a review of alternative methods undertaken to fix the problem such as fencing, moving deer on and deer culled to date. There should be evidence of dialogue with neighbours, to ensure impacts are understood.

Improving welfare also means confronting issues leading to over-reliance on these licences, including forests poorly designed for deer management and extraction*, under-staffing of rangers in state forestry and increased rejection of fencing as a management tool.

*A recent FOI to Forestry and Land Scotland showed that, in the last 5 years, 148 deer that have been shot have been unable to be extracted from state forests due to inaccessibility or health and safety.

The SGA does not believe targeting and harassing of deer, day and night, all year round, is beneficial to welfare.

For example, extending the open hill hind season at either end, we believe, is wrong.

The Deer Scotland Act was designed to give deer protection when in poor condition or in calf. By beginning management early, on September 1st, late calves will be left to starve if the mother is shot whilst searching for food.

Similarly, extending the season to the end of March will further deplete the bodily resources hinds need, to get through the remainder of winter and into Spring. Hinds will travel over a mile to settle after being shot at through the season, further depleting fat reserves.

Deer, in Scotland, are at the northerly extremity of their range. Their lean-ness, whilst advantageous in terms of a product for consumption, also makes them vulnerable to harsh weather and loss of sheltering grounds.

We fully recognise the difficulties in managing woodland deer populations, but the same welfare issues apply to culling roe does and red hinds in forestry from September 1st.

However, due to the changing behavioural movements of roe deer during February and March, which makes achieving the doe cull easier, we understand the necessity of culling does till the 31st March and support this.

By leaving hinds undisturbed in forests designed for deer control until the 21st October, this will draw stags into the hind hefted areas and will make the stag cull easier to achieve in daylight, reducing the need for night shooting.

Equipment for shooting at night

The SGA will also be seeking talks with public agencies regarding the future use of night vision and thermal imaging equipment in the shooting of deer. Whilst these tools are useful in spotting and counting, the potential for wounding animals needs to be analysed as this is a welfare concern.

For example, thermal imaging will not pick up non-heat sources such as foreground bracken or branches so there may be implications for shot safety, particularly with regard to deflections, with further implications for wounding.

Drizzly weather can impact shooter vision whilst rocks, on hot days, can give thermal readings, potentially leading to mis-spotting or shot ricochet.

Similarly, with thermal equipment, identifying the sex of deer is difficult. If a dominant buck is shot, 10 to 15 bucks may then be drawn in to claim that territory, increasing damage through tree fraying and attempts to mark out new territories.

Looking ahead, emerging technologies will have a role to play.

However, if this equipment was to become standard, the SGA will be recommending either a training requirement or operator licensing system to safeguard welfare and public safety.

- **Increased dialogue**

The SGA believes dialogue must be extended further, to ensure we encapsulate the views of the end processors - game dealers.

This will embed the idea that we are not simply 'killing deer' but cropping food as a national resource.

In 2017, the SGA learned one estate was ordered to manage 700 deer as part of a remedial cull. The estate had no access to a larder. No dialogue took place between SNH and local game dealers.

Dealers were left with a glut of poor quality, out of season, animals at their door.

Food Standards Scotland is, rightly, demanding excellence in venison production as Scottish Government explores further market growth, recently announcing a £20, 000 study.

Moving forward, food processors must become part of harvesting plans.

Simply wanting more deer shot does not always tally with the timescales of processors or FSS' requirement for quality carcass presentation.

Section 7 agreements and counts: What we would like to see.

Where damage on a Designated site is occurring and action is required through a Section 7 control agreement, there should be

- an independent assessment of damage being done by all herbivores prior to action, through detailed impact surveying which sets clear objectives for habitats at the site
- a clear understanding of the number of deer and sex of deer that each holding has to cull, plus the numbers of other herbivores, if applicable. If sheep or cattle are part of the problem, removal or reduction should be broached by SNH
- daily risk assessments must be carried out, with health and safety built into sensible timeframes, with local deer manager input. Days lost to weather should be noted and shared
- A trusted local deer manager should be appointed as an overseer, updating SNH on conditions, numbers controlled and on-ground issues. The overseer can also visit holdings having difficulty achieving targets, to understand why and report to SNH. SNH would then be able to apply proportionate steps to ensure wide compliance.
- A helicopter count in February/March to ascertain numbers and location of deer on individual holdings within the Section 7 area. Numbers of dead deer and their sex, found after the count, should be recorded and deducted from the count.
- Only then should cull numbers be allocated to each holding. This ensures the numbers are evenly distributed.

Deer counts.

Deer counts should be carried out at the end of the hind season, 15th February. By this time, hinds are hefted in their own areas and counts gives an accurate tally of numbers on individual holdings. Each holding involved in a Section 7 agreement should be given an individual cull target based on the numbers of hinds counted on their estate, on count day.

Counting at this time also gives an indication of the numbers of last year's calves that have survived the winter and the increment into the herd. To prevent double counting,

should weather force a ground or helicopter count to be abandoned, a resumed count should start from the beginning.

SGA Deer Vision

The 10 years ahead

‘valuing Scotland’s national resource’



Achieving a high quality, resilient environment

further analysis

- **Helping to qualify impacts of climate change and prioritise accordingly**

Scottish Government has indicated future climate targets will involve increased tree planting and greening. This will mean more habitat for deer. It will also change the distribution of deer, particularly in the lowlands.

There are practical considerations when considering transport links and green corridors.

When creating new greenspace in towns and cities, grasses selected should be unpalatable to deer. Trees should be widely spaced and ground vegetation minimised.

As deer distribution changes and, also, where deer migrate from overwintering areas to summer grazing, animal crossings should be factored into road and infrastructure design, in the form of overpasses and underpasses.

This will help reduce road traffic accidents and the costs to motorists and insurers, as well as accidents causing injury. It should also be noted that current winter road salt, containing diluted molasses, is palatable to deer, attracting them to roads.

Similarly, fences and trees should be kept 30 yards back from roads and motorways, particularly in well known accident black-spots. Speed restrictions should also be considered in these areas.

Landscaping, following road works, should consider grasses unpalatable to deer and keep trees widely spaced to avoid deer sheltering there.

As Scottish Government invests in transport infrastructure, such as further dualling of the A9, the SGA would be open to dialogue on how best to design these roads, with deer and other wildlife in mind.

- **Minimising the spread of non-native deer species and wild boar**

Today, there are known sites of hybridisation between non-native Sika and red deer. There are some sensitive spots in Mull of Kintyre, north through Lorn to Oban (including Knapdale).

Unfortunately, these areas are currently not covered by a deer management group. This means they will not be assessed in the 2019 Scottish Government review and may slip down the priority list.

There are also growing wild boar hotspots. While, for some, wild boar represent a biodiversity net gain, The SGA believes the environmental damage caused by the species will outweigh benefits.

SNH must consider their response to expanding boar populations and their environmental impact.

If management action is to be taken, this must happen before populations expand beyond the limits of what is possible through management.

- **Conserve and enhance the distinct identity, diverse character and special qualities of Scotland's landscapes, whilst cementing the cultural heritage value of working land.**

Deer are an integral part of our natural heritage. Scotland is relatively unique in having visible populations of large herbivores and Scotland's people have expressed a respect for deer greater than perhaps any other animal.

Their presence, and management, also make them part of our cultural heritage. Much of Scotland's ecological values are derived, in part, from wild game management, knowing how these animals interact with, and shape, distinct landscapes.

Deer are filmed, drawn and written about. Robbie Burns wrote fondly of 'A-chasing the wild deer and following the roe' in, *My Heart's in the Highlands*.

In his 2018 book, '*Poacher's Pilgrimage*' Lewis-raised author and land reformer, Alastair McIntosh, extols the almost spiritual connection between stalker and quarry.

"We need them as role models of how people integrate with nature."

By taking a 'national asset' view of deer, Scotland can make the most from its resource, to benefit health and wellbeing and our connectedness with nature.

Deer management is also a valued economic activity, especially in sparsely populated, remote and economically fragile areas. Skills required to manage the species selectively and humanely must continue to be nurtured.

As we look a decade ahead, Scotland should acknowledge that its people and environment benefit from deer managers- whether the traditional highland stalker or the city deer manager- and the job of work they offer to the country at minimal expense to the public purse.

Our environment depends on these men and women.

Sustainable Economic Development

Greater benefit from our national resource

We have already stated how we will increase economic opportunities associated with wild deer.

The SGA also wishes to safeguard and increase employment currently associated with deer management.

The 2014 PACEC report, *The Contribution of Deer Management to the Scottish Economy*, covered a quarter of Scotland's land mass and encompassed sporting, woodland and purely environmental deer management interest (all interests benefit the environment).

That report cited job losses and damage to woodland and commercial forestry plantations as the principal negative consequences which would occur if deer management ceased.

The total impact of deer management in Scotland, including hospitality and supply chains, is £140.8m, supporting 2520 FTE jobs.

Importantly, £43.1m is *spent* on carrying out deer management.

This figure begins to explain the value (largely) private financed deer management has for Scotland's environment.

Of that £43.1m, only £12m is off-set by deer management *income*.

Whilst often criticised, those who provide deer experiences through sporting stalking are needed by Scotland.

Why?

Because their benevolence funds vital environmental work.

Whilst it is important for everyone in deer management to work towards the delivery of public goods as well as private, it is also important that sporting staking brings monetary return from paying clients.

Having insufficient deer to offer sporting clients will have a negative impact on deer manager jobs, supply chains and fragile rural communities.

It will also remove incentives which encourage the delivery of public environmental benefits or goods.

If we accept that deer management is necessary in order to achieve these public goods, then, if this incentive is lost, the investment will have to be funded by the tax payer; a significant added cost compared to where we are, in 2019.

The SGA's Vision is that government and agencies help foster deeper public understanding of this and that socio-economic benefits are not merely referred to in governmental papers, (as lip service) then dismissed.

The two are intertwined. Scotland needs private finance and the largely free resource of skilled men and women from the sporting sector and deer management groups, if it is to meet environmental targets.

Large scale culls have taken place in Scotland recently. There is a widely held acknowledgement that red deer numbers have been reduced.

On some estates, it is no longer possible to guarantee clients a stag. This is worrying for a staple rural industry. Professional stalkers' roles have been downgraded to part-time posts in some areas; staff numbers reduced in others.

The SGA does not want to see this skilled resource, which we help to train and support, lost to Scotland.

For example, in West Lochaber, the hill sheep sector is largely unprofitable, there are forestry challenges due to the inability to extract timber and the tariffs are largely gone from wind and hydro schemes. Sporting stalking, whilst not supporting the numbers of jobs seen in urban industries are nevertheless playing a disproportionately large role in local economies.

Despite there being a legislative mechanism to do so, there has never been a Section 7 Order in Scotland to protect socio economic interests.

Assessing deer movement

With deer now increasingly being managed in both the highlands and lowlands all year round- and at night- to protect forestry under license, there should be no surprise that, in 2019, these culls are having impacts on others' objectives and are also causing changes in deer movement and behaviour. As a result, deer are being found in places they were rarely found before.

Greater human disturbance, through heightened countryside access for walkers, mountain bikers and dog walkers has also seen red deer leave traditional ranges to find peace and quiet. There are deer health and management implications.

The SGA, for example, would advocate ear tagging of calves at calving time in deer forests.

This would promote new understanding of the movement of deer, especially hinds, and would help assessments of Section 7 areas.

Hinds will traditionally move only a mile and a half from natal areas. With increased recreational disturbance and year-round shooting, ear tagging will show us how much deer distribution and behaviour is being altered by human practices.

Scotland's public has demonstrated its love for deer and its desire to see them in their natural habitats. Deer are a tourism asset.

In order to increase revenues from deer, the SGA will continue to encourage more holdings to offer deer-sensitive photography and wildlife tours, with deer managers passing on their knowledge of quarry and habitat. This can generate additional revenue outside the main seasons and may attract new clientele.

Whilst this is already happening on a number of estates, it does not replace the principal product.

One estate currently offering tours, and stalking, told us:

“I can sell the same Stag a dozen times to photograph and once for stalking. However, the income from the stalking is still 7 times greater than the wildlife tourism.”

Organisations such as SNH could also support to the sector by creating viewing sites and explanation boards, making the most of opportunities to improve public education and understanding.

Looking forward, the SGA wants to ensure that Scotland can still maintain a traditional highland sporting product which brings people to Scotland from all over the world and buffers remote communities, socio economics and maintains our cherished cultural heritage.

SGA Deer Vision

The 10 years ahead

‘valuing Scotland’s national resource’



- **The SGA wants a proper cost-benefit evaluation of modern fencing technologies.**

Today, in 2019, private forestry companies will use, as standard, a percentage of initial subsidy to fence tree planting areas to protect an economic crop.

They are also fencing or re-fencing restocking blocks, aware that fencing can be damaged during felling and extraction. This prevents incursions of deer and deer damage, lessening the need for culling and minimising the need to pay contracted managers.

Fencing was once a recognised management tool to protect forestry and agricultural interests. Without fencing in agriculture, it's impossible to keep domestic livestock and grow crops and cereals. Fencing is not a permanent feature but a temporary management tool.

On state land today, and on a lot of NGO land, fencing is becoming less used. Many reasons are given including public access, bird strikes (not currently measured), visual aesthetics and the need for beneficial grazing in some stages of woodland establishment.

A principle reason, though, is the initial cost of fencing plus maintenance; something which used to be done by rangers in state forestry.

The model (without fences) requires year-round culling under license, payment-per-animal fees, poor quality venison, and over-reliance on short-term contract staff with little local benefit.

Coupled with greater recreational disturbance, this also sees the drift of red deer from the deer forest, into areas rarely seen before.

Looking ahead, we would like to see a reappraisal of fencing as a management tool, underpinned by a comprehensive cost-benefit analysis of modern fence types.

The SGA acknowledges that fences are not for all situations, for example in urban and town green spaces created so that the public can enjoy nature and space.

If public access is an issue, the provision of styles and gates on fences should be explored.

The devaluation of fencing as a management tool, for cost reasons, though, requires much deeper analysis.

Even with traditional designs, a well erected fence can last 20 years with minimal repair.

It is a longer term investment to protect a guaranteed asset and return, whether that be economic or environmental. Fencing technologies have moved on from where they were 20 years ago.

We believe new options should be considered and evaluated fully.

In 2014/2015, Forestry Commission Scotland spent between £500 000 and £1m on fencing. However, that was in order to produce 3m tonnes of timber worth £40m and to protect a biological asset worth 1 billion pounds. Most industries would consider it good value to invest a 40th of their income in order to protect a financial asset that produces annually.

Alex Hogg,

Chairman,

The Scottish Gamekeepers Association,

October 2019.

