

Responding to the Managing deer for climate and nature consultation

LINK Deer Group Guide

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LINK Deer Group have prepared key points for responding to the Scottish Government Consultation [Managing deer for climate and nature: consultation](#). The consultation aims to reform and modernise deer management in Scotland.

The current proposals from Scottish Government to modernise deer management in Scotland arise from implementing the recommendations of the independent Deer Working Group accepted by Scottish Government. The LINK Deer Group support all these recommendations.

The current SG consultation is a “high level” consultation, and whilst some of the recommendations of the independent DWG Report are not immediately obvious, we understand that the more detailed and technical issues will be implemented in full.

Sustainable deer management is essential in the context of the climate and nature emergency and if Scottish government is going to meet the aspirations for delivery of the Scottish Biodiversity Strategy, as well as deliver woodland expansion and protect peatlands to help meet targets for Net Zero. High deer populations in some areas may also cause damage to a wider set of public interests including agriculture and road traffic accidents.

Theme 1: Enhancing the Natural Environment

Subject to further detail and identification of areas where this strategy will be implemented, we support the proposals for new powers for NatureScot to implement Deer Management Nature Restoration Orders. It is proposed to move the focus away from preventing damage by deer towards ensuring enhancements of natural habitats. We expect the two National Parks and Scotland’s Rainforest to be included in priority areas. We agree with the landscape scale type approach.

We support the reduction of deer numbers in priority areas; public incentives for land managers in these areas to achieve required cull targets; use of powers by NatureScot to enter land and recover costs of deer management if culls are not being met; and use of private stalkers to achieve these objectives if necessary. We suspect an all Scotland approach may need to be taken given the highest population levels of deer on record, and the need to reduce numbers to prevent damage to various public interests. In the meantime, we accept that a pilot approach should be tested to ensure the measure delivers the necessary public objectives in the urgent timescale required.

Theme 2: Compulsory Powers and Compliance

Good deer population data should inform sustainable deer management planning. We support implementation of the Forestry Wildlife Management Dashboard approach across the whole of Scotland and compulsory data returns for deer culls. Recommendation 97 of the independent Deer Working Group Report also suggests a compulsory Cull Approval system is implemented by NatureScot.

We support use by NatureScot of s10 powers under the Deer Scotland Act 1996 to enter land and reduce deer numbers and to recover costs. We need further clarity on how section 7 and 8 voluntary and compulsory control orders will fit with DMNROs. Section 7 voluntary control orders have failed to deliver sustainable deer populations in most of the areas where they have operated sometimes for many years.

Theme 3: Deer Welfare

We support the general principle that all those who manage deer should be on a fit and competent register. We believe that the “7 Principles of Animal Welfare” should apply to all deer management in Scotland.

We support replacement of individual authorisations and consent for those practitioners on the fit and Competent Register.

Theme 4: Changes to Close Seasons

If we are to reduce deer populations across Scotland, then changes will be required to the female deer seasons to complement the removal of the male deer season which has already taken place by secondary legislation in 2023.

We support the same close season of 31st March to 30 September for all species and all female deer and covering the period of highest welfare risk when female deer have dependent calves.

The removal of the male deer season must be retained to facilitate deer management for those who chose to exercise this option and where there are no significant deer welfare issues.

Theme 5: Venison

We support all measures to remove barriers and encourage affordable venison to reach local markets across Scotland.

We believe that all deer in Scotland should be managed using non-lead ammunition. Lead ammunition is toxic to other wildlife and humans and its continued use by a small number of deer managers undermines public confidence in the venison market.

Theme 6: Kept and Farmed Deer

We support proposals for NatureScot to licence all farmed deer and any releases of farmed deer into the wild. Consideration of the reindeer population in Scotland should be part of these proposals.

These proposals should link in with wider Scottish Invasive Non-native Species legislation and policies, including those in the Wildlife and Natural Environment Act 2011.

Scottish Environment LINK is the forum for Scotland's voluntary environment community, with over 40 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society

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