

Written evidence from the Association of Deer Management Groups (ADMG)

ADMG has now had an opportunity to give initial consideration to the Report published by the Land Reform Review Group on May 23rd. Our comments below are limited to the Section in the Report on Deer Management, (Section 32).

The Report sets out in considerable detail the background to the current voluntary principle arrangements for the management of wild deer in Scotland. It is a matter of some surprise to ADMG that, other than an approach to use our published Deer Management Groups map, which has been included in the Report, the Association received no request for information or invitation to meet with the Review Group, despite our offer to do so. We are equally surprised that the Report makes little more than passing reference to the Review carried out by the RACCE Committee in 2013, particularly as the findings and recommendations of the Committee and the Response from the Environment Minister have now become central to the current context of deer management.

ADMG was pleased to have an opportunity to submit written and verbal evidence to the Committee in relation to the 2013 Review. We were glad to be able to inform Committee Members as to the operation of Deer Management Groups and of the steps being taken to increase their capacity. We accept the recommendations of the Committee and in particular we accept the need to develop our thinking on how deer management relates to the public interest. In practical terms our role is mainly to assist member DMGs in developing effective Deer Management Plans which will meet the requirements of both public and private interests through collaboration between all relevant parties. We consider the timescale for this process, requiring demonstrable and significant progress by the end of 2016, to be realistic and achievable.

ADMG has developed a "DMG Benchmark" which, after consultation with our Members, is due to be published shortly but which is already proving of value to Deer Management Groups. The Benchmark is intended to be a non prescriptive but comprehensive specification of the criteria and actions which define an effective DMG. A copy of the final draft is attached. It is targeted mainly at upland DMGs but will also be of some value in guiding deer management in lowland and near urban situations. Deer management varies greatly across Scotland and, as stated in our evidence to the Committee in November last, a one-size-fits-all approach would not be appropriate or practicable. The Benchmark therefore requires local interpretation and application. We do not envisage Deer Management Groups being measured against a fixed point of achievement at any future time but they will continue to develop and we believe the Benchmark will provide helpful guidance for that purpose.

ADMG also produced our "Principles of Collaboration" early in 2013. This is intended to assist DMGs in reconciling potentially conflicting management objectives within a DMG. It is proving useful and it was pleasing to have it acknowledged during the Committee Evidence sessions.

Following the Committee Review Scottish Natural Heritage has made a number of changes to increase the allocation of wildlife staff resources to support deer management. ADMG welcomes this and both organisations are working together on a joint Collaborative Deer Management Project. This comprises a number of elements including the DMG Benchmark, the development of a computer programme for collating and analysing data gathered by DMGs, and a self assessment framework to enable DMGs to measure their progress in achieving the Benchmark criteria, specifically the development and implementation of an effective Deer Management Plan.

In summary ADMG considers that the RACCE Review has been beneficial in creating guidance as to the public interest aspects of deer management and increasing support to DMGs in going forward. We consider that Deer Management Groups are making steady progress and that they will continue to do so. Of particular note is the number of DMGs which are progressing the development of their Deer Management Plans and giving consideration as to how best to develop their approaches to local communication to ensure openness and transparency.

The LRRG Report recommends further change to deer legislation. It proposes the creation of a statutory requirement for landowners to control deer on their land, with backup powers to SNH to take this on and recover costs in the event of failure to do so. It also recommends a statutory requirement for landowners to seek consent from SNH to cull deer based on a culling target to be agreed by SNH. This is, in effect, a recommendation for a regulated basis for wild deer management in Scotland. As the RACCE Committee concluded that additional time should be allowed to test the effectiveness of the voluntary approach to deer management, this being endorsed by the Minister, we can see no value in additional legislation at this stage prior to further review in or after 2016. We also question incidentally why the Report makes recommendations in relation to deer while not considering the impact of other wild herbivores, such as rabbits, hares and goats, on the environment and other aspects of the public interest.

The commitment of ADMG is to demonstrate that the voluntary system of deer management can deliver both public accountability and the environmental, economic and social sustainability which are precepts of the Scottish Government Rural Strategy. The mechanisms proposed by the LRRG would be cumbersome and would impose a considerable further burden on both deer managers and also SNH. They would also lack the flexibility required to reflect local circumstances. In addition they would be costly and the suggestion that this cost could be demitted to deer managers through the reintroduction of sporting rates would simply reduce the private funding available to fund the necessary management of wild deer in Scotland.

ADMG will be pleased to expand on any of the above points and is available to give verbal evidence to the Committee if required.

THE DMG BENCHMARK

The DMG Benchmark sets out the criteria whereby a Deer Management Group or Sub-Group can assess and demonstrate its effectiveness in relation to the Code of Practice on Deer Management to meet a range of management objectives and deliver the public interest.

The application of the Benchmark criteria will vary to reflect the circumstances of individual DMGs. The Benchmark is not intended as an absolute standard but all DMGs should use it as a measure of progress towards sustainable collaborative deer management.

Deer Management Groups are voluntary bodies and The DMG Benchmark is therefore issued as guidance with the strong recommendation of the Association of Deer Management Groups.

Membership

- All property owners within a deer range should be members of a DMG, including private and public land owners; also, where possible, agricultural occupiers, foresters, crofters and others on adjoining land where deer may be present. In some cases this may extend to householders with private gardens.

Meetings

- DMGs should meet regularly. Two formal meetings per year is the norm but more frequent interaction between members, between meetings, should be encouraged.
- For effective collaborative management to take place it is important that all DMG Members should attend every meeting or be represented by someone authorised to make appropriate decisions on their behalf.
- In addition to landholding Members, including public sector owners, public agencies such as SNH and Forestry Commission Scotland should be in attendance and other relevant authorities such as Police Scotland may be invited to attend DMG meetings.
- Meetings should operate to an agenda and be accurately minuted. Attendees should be encouraged to participate and agreed actions and decisions should be recorded.

Constitution

- All DMGs should have a Constitution which defines the area of the Group, sets out its purpose, its operating principles, membership and procedures, in addition to providing for appointing office bearers, voting, raising subscriptions and maintaining financial records

Deer Management Planning

- All DMGs should have an up to date, effective and forward looking Deer Management Plan (DMP).
- The DMP should record all the land management objectives within the DMG area.
- The DMP should identify the public interest aspects of deer management
- It should include a list of actions that deliver the collective objectives of DMG Members as well as public interest objectives. These actions should be updated annually.
- It is important that all DMG Members should play a full part in the planning process and in the implementation of agreed actions
- The DMP may identify potential conflicts and how they can be prevented or addressed to ensure an equitable approach to the shared deer population.
- Relevant local interests should be consulted on new DMPs and advised of any changes as they come forward.
- DMPs should be publicly available.

Deer Management Plans can be commissioned using external specialists or can be prepared by DMG Members. In some cases grants may be obtainable. Wild Deer Best Practice (WDBP) provides guidance on deer management planning

Code of Practice on Deer Management

The SNH Code is now the foundation document for sustainable deer management. It asserts both the private interest and the public interest in deer management and defines sustainable deer management in economic, environmental and social terms.

- The Code should be endorsed by all DMGs and referenced in both the Constitution and Deer Management Plan of every Group. The terms of the Code should be delivered through the Group Deer Management Plan.

ADMG Principles of Collaboration

The Principles www.deer-management.co.uk/aboutus/publications have been devised by the Association of Deer Management Groups to assist DMGs in reaching a consensus on deer management matters and in working together in a neighbourly and collaborative manner which recognises and respects the equal legitimacy of all deer management objectives which comply with the Code. ADMG can assist DMGs in negotiation and mediation processes where necessary to reach consensus.

- The Principles of Collaboration should be incorporated into all DMG Constitutions and Deer Management Plans.

The Principles of Collaboration are attached to the benchmark as an appendix.

Best Practice

The Best Practice Guides (WDBP) represent in detailed form the collective knowledge, wisdom and experience of deer managers as to how to carry out all practical tasks safely so as to ensure their own safety, public safety, deer welfare and food safety.

- All deer management should be carried out in accordance with Best Practice.
- All Deer Management Plans should reference and follow WDBP which will continue to evolve.

Data and evidence gathering – counts, culls and habitat monitoring

Deer management decision making should be based on evidence which is collated in the DMP and updated regularly. Data gathered by DMGs will include deer count data, culls, and reproductive information from larder records and recruitment counts; in addition regular habitat impact assessments (HIA) should be carried out and resultant information be gathered and collated in a consistent manner. Other relevant data may relate to deer/vehicle collisions, deer welfare etc. DMGs should have access to and should use evidence gathered by Government bodies and research organisations. DMGs should make Group data publicly available through the DMP.

Deer counts

- Accurate deer counting forms the basis of population modelling.
- As publicly funded aerial counts are now exceptional, DMGs should aim to carry out a regular well planned coordinated foot count of the whole open range deer population. The norm is to count annually.
- Sample counts should also be carried out systematically so that the population can be accurately categorised and adjusted for post count losses.
- Recruitment and mortality counts are also essential for population modelling.
- Where there are insufficient personnel to carry out a full foot count assistance may be secured from a neighbouring DMG or elsewhere.
- Other census methods may be required in some circumstances, eg dung counting in woodland or other concealing habitats or on adjoining open ground.

Culls

Population modelling will determine the age and sex structure of the deer population and the required culls of male and female deer.

- All DMGs should agree a target deer population or density which meets the collective requirements of Members without detriment to the public interest.
- The cull should be apportioned among Members to deliver the objectives of the DMP and individual management objectives while maintaining the agreed target population and favourable environmental condition.
- The Group cull target should be reviewed and, if necessary, adjusted annually.

Habitat Monitoring

The welfare and condition of wild deer is dependent on the availability of food and shelter throughout the year, particularly over the winter months and in the spring. Good environmental condition is of public as well as of private value. Habitat monitoring is intended to confirm that grazing offtake is at a level where habitat condition is either maintained or improved. Habitat Impact Assessment training is available.

- DMGs should carry out habitat monitoring. Habitat Impact Assessments (HIA) measure progress towards agreed habitat condition targets on both designated sites and the wider deer range.
- HIAs should be carried out on a systematic and regular basis. A three year cycle is the norm but many find annual monitoring useful.
- Data is required on other herbivores present and their impact on the habitat.

DMPs should include a section on habitat monitoring methods and procedures and record annual results so as to measure change and record trends.

Competence

The deer sector is self regulating in terms of training and competence. 'Competence' has been defined as Deer Stalking Certificate (DSC) 1 or equivalent qualification. A Fit and Competent Register is administered by SNH and registration is required for deer managers or contractors who may need to carry out work under statutory Authorisation. DSC 2 is generally required for inclusion on the Competence Register.

- It is recommended that in addition to DSC 1 deer managers should also attain DSC 2 or equivalent.
- Deer managers supplying venison for public consumption are required to certify carcasses as fit for human consumption to demonstrate due diligence. "Trained Hunter" status is required for carcass certification.

Training

- All DMGs should have a training policy and incorporate it in the DMP.
- All DMG Members or those acting on their behalf should undergo the necessary training to demonstrate Competence.
- The training policy should promote and record continuing professional development through Best Practice Guidance.
- The training policy should also cover health and safety, including lone working, as well as relevant specialist training relating to firearms and other equipment, vehicles and machinery.
- Employers within the DMG should ensure that employed deer management staff receive relevant training.

Venison Marketing

The supply of venison of the highest standard into the food chain should be a prerequisite for a DMG and its members. Membership of the Scottish Quality Wild

Venison scheme is recommended by ADMG, as is collaborative marketing where appropriate.

Communications

The Code directs that DMGs should operate in an open and transparent manner.

- DMGs should include a Communications Policy in their DMP. External communication should be directed at parties not directly involved but with an interest in deer management including individuals, local bodies such as community councils, local authorities, local media and other specialist interests.
- An annual communication programme suitable to local circumstances is advised. This might include a DMG website or a page on www.deer-management.co.uk, an annual Newsletter, annual open meeting, or attending local meetings by invitation.
- A Deer Management Plan should be accessible and local consultation during its development is advised.