



For discussion

Title: Managing deer for climate and nature: consultation

Prepared by: Colin McClean, Head of Land Management

Purpose

This paper sets out the Parks Authority's response to the Scottish Government consultation on 'Managing Deer for Climate and Nature' - [Managing deer for climate and nature: Consultation \(www.gov.scot\)](https://www.gov.scot)

Recommendation:

The board is invited to:

- a) Approve the response to the 'Managing Deer for Climate and Nature' consultation set out at Appendix 1

Background

1. This consultation builds on the Deer Working Group recommendations that were accepted by Scottish Government.
2. The Park Authority policy position is clearly set out in the National Park Partnership Plan 2022 - 2027.
3. Objective - Reduce the negative impacts of red deer and other herbivores across the National Park to enable woodlands to expand, heather loss to be reversed, peatlands to recover and wider biodiversity and landscape enhancements to take place.
4. Target - Average open range red deer densities in each deer management group are a maximum of five to eight per km² by 2030.
5. Target – Non-native sika and fallow deer will be contained within their current distribution in the National Park by 2030



6. This consultation provides an opportunity to ensure that the national framework helps the Park Authority and partners to achieve its stated objective for the national park on deer management.

Consultation Structure

7. The consultation is broken down into 6 themes. These are:
 - Theme 1: Enhancing the natural environment.
 - Theme 2: Compulsory powers and compliance.
 - Theme 3: Deer welfare
 - Theme 4: Changes to the close seasons.
 - Theme 5: Venison
 - Theme 6: Kept and farmed deer
8. The Park Authority proposed response to the consultation is set out at Appendix 1.



Appendix 1 - Cairngorms National Park Authority Consultation Response

Introduction

1. The consultation on Managing Deer for Nature and Climate is of great importance for the long-term management of deer within the Cairngorms National Park. This includes the management of red deer in the open range and within expanding woodlands, the management of roe deer in agricultural land and woodland and the ability to control invasive species, such as, sika deer.

Theme 1 Enhancing the natural environment

2. The National Park Authority supports the principle of Deer Management Nature Restoration Orders (DMNROs) that provide Nature Scot with a power to require nature enhancement in addition to their existing powers to prevent damage. The move from just considering damage to looking for enhancement is crucial to tackling the twin nature and climate crisis and rectifies some of the inadequacies of the current regulatory approach.
3. However, there is a lot of detail that needs to be considered and the National Park Authority would like to see further information on the detail around where DMNROs would be applied and what the criteria would be for selecting these areas, how DMNRO's would be applied in areas with a significant mix of herbivores and how DMNRO's tie in with existing section 7, 8 & 10 powers for NatureScot, as well as, other powers such as Land Management Orders?
4. There is also a need to ensure that the development of DMNROs are linked with the development of long-term deer management incentives to ensure that where deer levels are taken down to levels where sporting income falls there is support for maintaining deer management to deliver public policy outcomes e.g. woodland expansion, peatland restoration etc.
5. The Park Authority would wish to be a statutory consultee on the introduction of any DMNRO within the National Park and would expect DMNROs in the National Park to be linked to the delivery of the National Park Partnership Plan outcomes and targets.



Theme 4: Changes to the close seasons

6. The Park Authority supports the date for the close season for hinds being moved from 16 February to the 31 March but does not support the movement of the date from the 20 October to the 30 September.
7. Any change to the close season for female deer is an attempt to balance the ability to reduce deer damage with the need to protect dependent deer calves. Any change to the deer season still leaves the decision of when to shoot at the discretion of each landowner. Extending the open season for all species of female deer up to end March will enable those who wish to shoot females to do so without increased welfare concerns, but will not compel those who do not wish to cull female deer to do so.
8. However, shooting female deer with dependent calves in October can create deer welfare problems. Any calf orphaned in October will almost certainly die from exposure, inadequate nutrition and / or lack of knowledge on how to cope with severe weather events etc. There is a reasonable argument for retaining the date for the end of the current close season for all female deer as 20th October.

Theme 5: Venison

9. The Park Authority would like to see far more work carried out in Scotland to promote and expand the use of venison especially with the increase in culling that is proposed to be carried out in Scotland over the coming years. There is a real opportunity to look at branding and to look at more marketing of the product in Scotland.
10. The proposal to abolish the Venison Dealers Licences (VDL) and to treat deer similarly to other game has some merit. Currently the emphasis is placed on those who buy venison to hold a VDL. There may be some merit in switching that emphasis so that deer managers who sell venison have to hold that licence and therefore have to report culls more comprehensively than currently.
11. Overall there is a need to ensure the system provides good levels of traceability and safeguards the venison sector.