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Please provide general feedback on the content of the draft 'Deer Management on the National Forest Estate – Current Practices and Future Directions'.

Feedback:Ramblers Scotland welcomes the opportunity to comment on these strategic proposals for deer management on the National Forest Estate. It is important that the NFE continues to provide an exemplar of good practice in deer management, and in the integration of deer management with other land uses, and promotes this best practice to other land managers. There is much in this document that we support. Ramblers Scotland is the representative body for walkers in Scotland and recognised by sportscotland as a governing body of sport. We have 6,400 members across Scotland and 55 local walking groups, all run by volunteers. Our aims are to promote walking, secure and facilitate public access to land and to protect the countryside.

1 Is this document helpful in explaining and communicating the context, aims and implementation of deer management on the NFE ?

Q1:Yes. The document clearly explains the approach to deer management within the wider context of the strategic objectives for the NFE in delivering social, economic and environmental benefits. We note the FES cull represents 28-30% of the Scottish deer cull, with a proposed increase for the next two years. Since the NFE covers 9% of Scotland's land area, this suggests that culling targets elsewhere in Scotland are not being met and deer densities are much higher than on the NFE, which can lead to higher grazing pressures and subsequent significant impacts on biodiversity. As FCS is shown to be contributing to the Association of Deer Management Groups and Lowland Deer Network, we believe this merits a stronger voice being heard for the public interest on these groups. Voluntary culling targets are clearly not working in all areas of Scotland so greater encouragement for other land managers to come into line with the practices of FCS is required. This could be based on a sharing of the evidence gathered from FCS research into, for example, contrasts between benefits to flora and fauna in areas of lesser and greater grazing pressure, economic benefits of nature tourism in areas of greater biodiversity, etc.

2 Do you have any comments on how our deer management directions contribute to the objectives of 'Scotland's Deer a National Approach' ?

Q2:We believe this document contributes to the objectives of sustainable deer management as laid out in 'Scotland's Deer - a National Approach'.

3 Do you have any comments on how our deer management practices contribute to front line delivery of the 'Code of Practice on Deer Management' ?

Q3:We believe that FCS is leading by example in this respect.

4 Do you have any comments on the future directions and commitments presented in the document ?

Q4:We are pleased to see the commitment to maintaining access to the forest estate for recreation while deer management activities are being carried out. We fully support this approach as we believe temporary, local management measures to be the best way of gaining public support, and therefore compliance, with any short-term restrictions on access and these are the most effective ways of managing deer culling activities. However, we have concerns with this document in two respects:1.It is stated that FCS invests over £6m each year in deer management and fencing. From a Parliamentary Question in December 2012, the Minister for Environment supplied figures which showed that over £23m of public funding has been spent on deer fencing between 2003 and 2012. This includes funding from FCS, FES, SNH and the Scottish Government and covers a variety of funding streams, such as the Scottish Forest Grants Scheme and Rural Priorities under SRDP. We are particularly concerned that the funding for fencing has risen from £572,000 in 2003 to over £5m in 2012. The consultation document clearly lays out the varied disadvantages which result from using deer fencing and yet it appears to be standard practice to erect fencing in all forestry schemes. For natural and semi-natural woodland in particular, we would prefer to see a greater use of culling to reduce deer numbers to levels which would enable woodlands and forests to withstand grazing pressures without major impact on their natural regeneration. We also believe this improves deer welfare. In addition, we have concerns that natural regeneration without the use of fencing is not normally encouraged within the remit of forestry grant schemes, and would prefer this option to be available over a long-term period. We recognise that a move to reduce the use of fencing would be controversial with some land managers but believe it is important for FCS to lead the way in changing the culture of the forestry industry. The current situation has led to this massive expansion in deer fencing across Scotland with the resulting impacts on landscape amenity, recreational access and also biodiversity, where, for example, lack of sustainable grazing can lead to unnatural plant growth and is detrimental to natural regeneration.2.The document states that deer make an iconic contribution to Scotland's tourism industry, and we are aware of comments made in the press by tourism providers who support the presence of deer closer to settlements and roads so that tourists are able to easily view deer. We believe there is a strong role for FCS in supporting opportunities for wildlife viewing, while at the same time educating visitors and those in the industry that deer are not naturally present for easy sighting, unless they are driven closer to settlements as a result of welfare issues such as lack of food or shelter on the higher ground. Tourists should not expect to see deer (or other wildlife) as a matter of course in the wild, but should learn to cherish rare sightings.

5 Do you think that there are any major gaps or omissions in the document ?

Q5:We would support the greater use of the NFE for site visits to disseminate good practice in order to raise standards within the industry. Such visits could also provide evidence of the wider societal benefits of lower deer densities coupled with less use of fencing for neighbouring landowners who may have objections to these more sustainable practices.