

Deer management

Letter from the British Association for Shooting and Conservation, 18 February 2025

Dear Convenor of the Rural Affairs and Islands Committee,

The Rural Affairs and Islands Committee heard evidence from key stakeholders on 29th January 2025 regarding deer management in Scotland. Regrettably, the British Association for Shooting and Conservation (BASC), representing a majority of vocational deer stalkers in Scotland, was not invited to participate.

The British Association for Shooting and Conservation (BASC) has 150,000 members, making us the largest shooting and conservation organisation in Scotland and the wider UK. 42,000 of our members (28%) are actively involved in deer management across the UK.

BASC members are the backbone of deer management in Scotland. 5,500 Scotland members who actively take part in deer management, range from professional deer managers to vocational stalkers, right across Scotland's many diverse landscapes. Their work contributes to managing the deer population of Scotland, contributing to nature and climate goals, as well as producing Scotland's wild venison.

Such an omission is particularly concerning given the crucial role played by BASC members in managing Scotland's deer population, especially in the Lowlands where formal deer management structures can be limited. Our members make a significant contribution to population control, biodiversity protection and the sustainable use of venison, yet their perspective was entirely absent from this important discussion.

The hearing included representatives from landowning bodies, conservation organisations and statutory agencies, but the exclusion of a major stakeholder group like BASC resulted in an incomplete and unbalanced discussion. Key issues such as the challenges facing vocational deer managers, the lack of structured support for Lowland deer management and removing barriers to entry for those seeking to participate in deer management were therefore not adequately addressed. Further, the impact of proposed regulatory changes on individual stalkers, such as mandatory testing, received scant attention.

BASC strongly believes our expertise and experience would have added appreciable value to the Committee's deliberations and evidence base. In light of this, please find attached our responses to some of the broad themes discussed at the Committee meeting. We would welcome the opportunity for BASC to present oral evidence to the Committee.

BASC looks forward to working with the Committee in the future to ensure all perspectives are represented in this vital area of rural policy, land management and wildlife management.

Issues relating to the Committee session on 29th January for which are of utmost importance to BASC

Deer Management Nature Restoration Orders

1. The concept of Deer Management Nature Restoration Orders (DMNROs) suffers from significant ambiguity regarding their scope, applicability, and decision-making criteria. The 'Managing Deer for Climate and Nature' consultation provided little concrete detail, granting Nature Scot officers broad discretionary powers to impose a DMNRO whenever they assess potential 'social, economic or environmental benefits' from nature restoration. Unlike existing intervention schemes, DMNROs shift focus from preventing damage to promoting biodiversity and climate goals, yet they rely on similar practical mechanisms, such as contractor-led culling. However, the terminology used, such as 'natural capital enhancement' and 'encouraging natural regeneration', is vague and subjective, making it difficult to establish clear criteria for their application. The absence of an objective baseline means that decisions rest entirely on Nature Scot's discretion, raising concerns about arbitrary enforcement and a lack of transparency for landowners.
2. Without clearly defined goals or measurable benchmarks, DMNROs are unlikely to deliver effective results or gain stakeholder confidence. Landowners are left uncertain about compliance, increasing the risk of disputes and even prosecution due to inconsistent or unclear enforcement. This lack of precision not only threatens property rights but also undermines engagement, as stakeholders may only participate under threat of criminal sanctions. Furthermore, the discretionary nature of DMNROs could lead to inconsistent applications and costly legal challenges. Their failure to integrate with existing deer control mechanisms, which are already available but underutilised, further questions their necessity. Given these weaknesses, DMNROs in their current form appear unlikely to achieve meaningful nature restoration outcomes and risk exacerbating tensions rather than fostering cooperation.

Structured Support for Lowland Deer Management

- Deer are no longer considered a financial asset by many landowners and deer management is a costly activity. Just tinkering with legislation will not increase the number of deer shot and if the Scottish Government are serious about reducing deer populations, then they need to look less at punitive measures and more at suitable incentives. Indeed Forest & Land Scotland (FLS) own figures suggest that it costs at least £200 per deer shot. So, if it is in the public interest that landowners reduce their deer herds then surely it is only right that the public pay for such goods.
- A better approach would be to acknowledge that deer management is a costly exercise and if a certain level of cull was required to restore nature in an area, then a system of financial incentives should be offered to those landowners to help them achieve the desired deer population level. If the payments recognised the true costs and potential profits foregone, as occurs with other

land management grants (e.g. the NS Goose Management Scheme), then sufficient owners could be persuaded to participate to ensure a real impact across the landscape.

- We are concerned that the market for venison has not been addressed at all. There needs to be much greater emphasis on ensuring there is a final market for the venison produced and that the supply chain has no bottlenecks. The Scottish Government state that we need to cull another 50,000 deer per year but we see nothing within current proposals that addresses what we are going to do with these extra carcasses. The current AGHEs can barely cope with today's level of culling so without some serious investment in suitable plant, and marketing of final product, this quality protein will go to waste. For example, the Scottish Government could provide support to AGHEs to develop their capacity, and finance local chillers or collection centres that would enable community deer stalkers to put their carcasses into the public food chain. Furthermore, there needs to be a much bigger publicity campaign, not demonising deer, but promoting the ethical and food values of wild venison to the Scottish public.

Mandatory Testing

- BASC strongly disagrees with the proposal that anyone who shoots deer in Scotland must have achieved a mandatory minimum standard, as there is no evidence it is required. We have had only 3 claims through our members insurance, linked to deer stalking across the whole of the UK over the last 20 years, and only 1 of them was related to a firearm incident. Similarly, we are not aware of any welfare issues arising from legitimate deer management and would like to see the evidence it is required before such a draconian law was introduced.
- BASC is a leader in deer management training and we strongly believe that high standards underpin the ethical management of deer. Our stance is that self-regulation from within the sector has achieved and will continue to maintain these standards and that mandatory testing will just create added bureaucracy and a significant barrier to new entrants.
- The effect of this first proposal would be to effectively halve the number of active deer stalkers in Scotland overnight to less than 7,500. The long-term result of a mandatory requirement for training would see a further decline in the numbers of deer managers available to undertake the cull required as this would act as a significant barrier to entry into the sector. The average age of BASC deer stalker members is 58, and unless we can provide easier access into the deer management sector, we will struggle to attract any new younger deer stalkers. This will have major impacts on our ability to control Scotland's deer herd in the future.
- The deer management sector has an excellent record of training and development and BASC is strongly committed to training to ensure that those involved in the deer management sector demonstrate the highest standards at all times, but we firmly believe that voluntary self-regulation is the best way to

achieve this, rather than a bureaucratic diktat.

- There is nothing within this consultation on exactly how such a register would operate and we are highly sceptical that it could be made to work in an efficient and effective manner, and finally there is no indication of how it could be policed. The reality is that many people will be put off getting involved in deer management in Scotland rather than endure a needless paper exercise.
- Instead of putting barriers in the way of new entrants we would like to see Forestry and Land Scotland provide opportunities for people to develop their deer management skills through access to the public forest. BASC has advocated for a system of community integrated deer management whereby local volunteers are trained and encouraged to undertake deer management alongside and coordinated by the professional wildlife ranger staff of FLS. Similarly, if the Scottish Government want to encourage greater uptake of qualifications within the deer management sector, then they should look to subsidise relevant training courses as the Forestry Commission have done in England.

Yours sincerely,
Peter Clark
Scotland Director
The British Association for Shooting and Conservation