SUMMARY OF CONSULTATION COMMENTS, AND FCS RESPONSE

BACKGROUND
The consultation on Deer Management on the National Forest Estate ran from 15/04/2013 to 8/07/2013. 40 responses were received.

The website unfortunately, in this instance, was not set-up to allow respondents to enter their details (name, organisation and e-mail address). Of the 23 respondees who gave their response via the website we were able to identify 11.

Of the 40 responses:
- 1 was from a government/public body.
- 6 were from deer management organisations
- 2 were from Deer Management Groups
- 1 was from a firearms organisation
- 2 were from forestry and/or wood using organisations
- 4 were from environmental groups
- 1 was from an animal welfare organisation
- 1 was from an access and recreation organisation
- 7 were from individuals
- 3 were from members of the FES Wildlife Ranger team
- 12 from respondents as yet unidentified

The consultation was undertaken through the Scottish Government consultation portal, which encourages responses against a set of specific questions. However, about 17 of the responses were by separate letter or e-mail, structured around the priorities and comments of the recipient, as were several of the website responses. For this reason we have not strictly adhered to the consultation question structure in this document, but have used a format which best expresses the comments made relative to the draft document headings.

Subsequent to the closing date one respondent made the point that having used his own e-mail address to submit his organisation’s response, he could not then use the same e-mail address to enter his own personal response.

COMMUNICATING DEER MANAGEMENT ON THE NATIONAL FOREST ESTATE – CURRENT PRACTICES AND FUTURE DIRECTIONS

This is FES’s first consultation document regarding deer management on the National Forest Estate. It aims to set out the FES approach and priorities for the management of wild deer within the context of our strategic directions and six key themes; treasured, healthy, productive,
accessible, cared for and good value – each of which has a connection with deer management.

The majority of respondents considered the draft to be a helpful, comprehensive, open, useful and well written document. Many respondents welcomed the opportunity to comment on our practices and future directions and were generally supportive of our approach to deer management albeit with comments qualified according to their own perspectives and objectives.

Some respondents found it useful that the document explained FES deer management practices within both the national and FES context. One respondent felt that the document should stimulate constructive feedback and discussion on matters important to deer managers across Scotland. Another suggested that we could usefully outline ‘lessons learned’ from our recent deer management activities.

Several respondents suggested that the draft could be improved in order to better explain our deer management activities to the general public and industry practitioners through the use of plain English which would make the document easier to read, understand and respond to.

One respondent commented that a well-written document does not necessarily ensure implementation and delivery in practice. Another commented that FES’s chosen deer management prescription is unsustainable, costly and not delivering desired outcomes.

Several respondents requested a more visual approach to the document via the use of maps, graphs, tables, illustrations and lists to emphasise and clarify aspects of team structure, deer hub regions, stakeholder organisations such as Deer Management Groups, the ecosystem approach, and deer management on the National Forest Estate (examples being a table to show the relationship between Scotland’s national cull figures and FES’s cull figures over recent years, and, provision of a breakdown by month of when the 11,000 Red deer are culled annually). Also the use of numbered headings and paragraphs would be useful.

FCS Response: We will:-

- Make full use of maps, tables, graphs, illustrations and lists where this will help explain and clarify strategic aspects of our deer management activities.
- Apply plain English to the text of the document.
- Use numbered headings.
- Describe some of the key lessons learned as a result of our ongoing deer management activities.

We have tried to ensure the document reflects the efforts currently being made by FES to implement and deliver our deer management objectives and our contribution to the delivery of Scotland’s Wild Deer a National Approach and the Code of Practice on Deer Management.
THE SIGNIFICANCE OF DEER ON THE NATIONAL FOREST ESTATE

One respondent suggested that the range of public benefits delivered on the National Forest Estate is likely to become more diverse and widen, and that FES’s future deer management objectives and prescriptions should mirror and support this diversity. Two respondents stated that it was necessary for FES to plan the optimal balance between timber, plants, healthy deer populations, venison production and public safety, with deer representing both an opportunity and a threat to FES objectives.

One respondent felt that FES should emphasise that the three sections under this heading are strategically linked to the three chapters in Scotland’s Wild Deer a National Approach.

Respondents involved in the environmental and forestry sectors felt that FES was well placed via its deer management activities to:

- play a significant role in the delivery of biodiversity, the objectives of the Scottish Biodiversity Strategy and the SBS 2020 Challenge.
- progress practical delivery of the improved condition of upland and woodland habitats.
- give priority to helping the Scottish Government meet its targets and national/international obligations for improving the favourable condition of the features of Natura 2000 and SSSI sites.

The environmental respondents considered that FES’s deer management activities are likely to assist with the conservation of woodland and open hill bird and other wildlife species by improving the biodiversity of ground flora and associated fauna.

Several respondents recognised that in managing 9% of Scotland’s land, yet delivering around 30% of the Scottish national cull, FES has a significant role to play in delivering the sustainable management of deer in Scotland. The provision of national deer population (estimated) figures was considered very useful in setting the FES cull in context.

One respondent requested that FES define ‘fully functioning forests’ and ‘continuous forest cover areas/systems’.

Several respondents supported FES efforts and called for us to continue taking a lead role in developing and researching urban and peri-urban deer management, including programmes such as Woodlands in and Around Town. One respondent felt the document overstated the FES position regarding urban deer management.

One organisation concerned with access and recreation called for FES to provide opportunities for wildlife viewing whilst making clear to the public that deer are not naturally available for viewing. The same respondent supported the FES position that access to the NFE should remain open while deer management activities are being carried out. Another organisation suggested that FES should refer to access and recreation in relation to the Scottish Outdoor Access Code for avoiding any stalking.
areas for the minimum time and area and should reflect FES guidance ‘Managing woodland access and forest operations in Scotland’ in recognition that access and safety should work together.

Two respondents asked for FES to elaborate on the potential impacts and method options for managing deer on the National Forest Estate resulting from tree health issues such as Phytophthora ramorum [a fungal disease which affects Larch].

One organisation felt that FES management and research data would become more important as challenges such as tree diseases, affecting forest management and climate change issues, mean deer management practices on the National Forest Estate need to adapt. The ongoing new planting programme and the increased felling programme resulting from tree disease, the consequent restocking and use of alternative conifer species and broadleaves will place increased demands on deer management to protect the increased area and distribution of vulnerable crops.

Another respondent felt that FES should improve its business management skills, identify and exploit commercial opportunities which arise, and should reshape, evolve, adapt and redefine in order to meet new challenges.

**FCS response: We will:-**

- Emphasise in the document that our deer management objectives and practices will evolve, modify and adapt as necessary to reflect changing circumstances such as a future increase in the range of public benefits delivered on the NFE.
- Emphasise that the three sections under this heading are strategically linked to the three ‘Objectives’ chapters in Scotland’s Wild Deer a National Approach.
- Strengthen the presentation of FES’s deer management activities within the Scottish national context.
- Define briefly in the document glossary ‘fully functioning forests’ and ‘continuous forest cover areas/systems’.
- Include reference to the Scottish Outdoor Access Code in our section on Health & Safety recognising that access and safety should work together.
- Elaborate on the potential impacts and method options for managing deer on the National Forest Estate resulting from tree health issues.

We believe that the paragraph on urban deer management in ‘Supporting Social Wellbeing’ is a clear but simple statement on how we view our role in this developing aspect of our work.

We work hard through our business planning, audit and review processes to assess the internal and external factors, influences and challenges which impact on our business effectiveness, identifying opportunities and threats and adapting practices accordingly.
WORKING WITH OTHERS

There was considerable recognition from many respondents that FES contributes significantly to the objectives of Scotland’s Deer a National Approach and delivery of the Code of Practice on Deer Management.

One organisation suggested that FES should continue working with SNH and others to:

- identify how best to measure and monitor progress in delivering Scotland’s Wild Deer a National Approach objectives and the Code of Practice on Deer Management.
- develop key indicators that can be used by land managers to assess delivery of the Code of Practice on private and public managed land.

The same organisation requested that FES should consider how the 4 tenets of the Code of Practice could be taken and used to demonstrate how FES will work in partnership with others to deliver sustainable deer management across Scotland; Ensure wild deer welfare is safeguarded, Protect and enhance the environment, Support sustainable economic development, Support social well being.

The call for FES to use comparative performance indicators to measure the success or otherwise of its deer management operations was echoed by other respondents.

One organisation called for FES to continue working with Scottish Natural Heritage to support the Deer Management Group structure and seek to increase its effectiveness. It felt that FES has an important role to play nationally in working with Deer Management Groups to develop a mutual understanding and respect, effective collaboration and take forward both public and private objectives. Another respondent suggested that a current FES-SNH partnership project be used as an example to demonstrate effective delivery of deer management.

One respondent raised the need for FES to engage early with relevant Deer Management Groups in relation to forest areas with restock sites where there is likely to be increased risk to open range deer stocks. The same respondent, plus others, felt that FES should give further consideration to local culling solutions involving Deer Management Groups and communities where this is appropriate. One respondent suggested that direct feedback to DMGs by Wildlife Rangers would be useful.

Several respondents recognised the ongoing support FES gives to Deer Management Groups but called for us to continue improving collaboration and communication with stakeholders, including Deer Management Groups and local communities. They felt that FES should make more use of private resources and expertise, local knowledge and skills and should develop a better understanding of the socio-economic impacts locally of deer management on the National Forest Estate, and its effects on neighbouring land use objectives.
One ‘not for profit’ Deer Management Group offered active support to help FES reduce deer damage impacts to help achieve our deer management objectives.

One respondent felt that the document overstated the FES position regarding collaboration. Another respondent felt that FES’s strategy is unsupportive of, and conflicts with, neighbouring interests.

Several respondents considered that FES deer management practices are consistent with the Code of Practice on Deer Management and should be an ongoing and improving target. One respondent felt however that, given the scale of its budget, FES should be doing more to deliver the Code of Practice.

Several respondents welcomed our ongoing support, contributions to and representation on the deer initiatives. Some respondents suggested that the public money FCS contributes to supporting the voluntary system would be more effectively spent delivering a statutory framework for deer management in which FCS had a significant role.

FCS response: We will:-

- Recognise in the document the need for FES to discuss with SNH and FCS, comparative performance indicators to assess the contribution to Scotland’s Wild Deer a National Approach and delivery of the Code of Practice for land managers on private and public land.
- Indicate our intention to explore how best the 4 tenets of the Code of Practice could be taken and used to demonstrate how FES will work in partnership with others to deliver sustainable deer management and responsible land management across Scotland.
- Recognise in the document the role of FES in working with SNH to support the Deer Management Group Structure and seek to increase the structure’s effectiveness.
- Continue to work with ADMG and DMGs to develop a mutual understanding and respect, effective collaboration and to take forward both public and private objectives where this is compatible with FES objectives.
- Include an example of partnership delivery of deer management.
- Emphasise in the document the need for FES to engage early with relevant DMGs in relation to forest areas with restock sites where there is likely to be an increased risk to open range deer stocks.
- Recognise in the document the need for FES to give due consideration to suggestions by DMGs and communities for local culling solutions where this is compatible with FES objectives.

Our FES Wildlife Management teams work hard to communicate with and provide direct and regular feedback to the Deer
Management Groups. Whether by Deer Management Officer, Wildlife Ranger Manager and/or Wildlife Ranger depends upon local circumstances.

FES makes wide use of private resources and expertise in its deer management operations including surveyors, fence contractors, plant hire (ATV tracks), larder construction/maintenance, waste uplift, helicopter hire (deer counts), firearms dealers (inspections & repairs), contract stalkers and several hundred recreational stalkers.

FES supports, meets and collaborates regularly with a large number of DMGs, deer and venison initiatives, deer organisations, neighbours and partners regarding a wide range of deer management topics and issues. We recognise that agreement is not always possible where there are conflicting views and objectives, however, we are committed to ongoing discussion and resolution, where possible. We believe that the draft document reflects this approach.

Through its business planning, audit and review processes FES continually works hard to assess its operational effectiveness and use or resources, modifying the targeting of expenditure and programmes of work as appropriate.

In supporting and contributing to the voluntary system of deer management, FES works to deliver against the aims and objectives agreed with Ministers.

OUR APPROACH TO PROFESSIONAL STANDARDS

There was widespread recognition that FES strives to achieve high standards of sustainable deer management. Several respondents called for FES to continue providing leadership, delivery and demonstration of high standards, best practice and integration of deer management with other land uses and to promulgate this to the wider deer industry. Several of the same respondents called for FES to raise public and deer sector awareness of its deer management activities and the high standards achieved, using the National Forest Estate for best practice events. Some respondents felt that FES has a greater role to play in guiding deer management nationally.

Several respondents felt that the Wildlife Ranger team was understaffed and called for FES to increase the size of the team and to employ Wildlife Ranger trainees and apprentices. One respondent felt that Wildlife Rangers should be trained in biodiversity, the impacts of vermin and in predator control. Another, that power-sharing and cohesiveness within the deer management team needs to be improved. One respondent felt that FES should explain its use of volunteers to assist Wildlife Rangers during deer management activities.
Several respondents called for FES to make less use of contract stalkers on the National Forest Estate. Some respondents did not have confidence that contractors could deliver FES’s cull targets, deer welfare and night shooting objectives.

Two respondents felt that FES deer management training should be open to all interested parties. One respondent felt this would enable them to compete on a level playing field for inclusion on the FES approved contractor list. Another felt that FES was straying outside its remit by providing training, education and awareness.

Three respondents felt that the Deer Management Qualifications, Deer Stalking Certificates 1 & 2, should not be required for stalkers on the National Forest Estate since this may deter or exclude prospective recreational stalkers and that we should consider other forms of experience and demonstration of proficiency. There was however support for FES’s approach in its continued use of Deer Stalking Certificate 2 as the required level on competence on the National Forest Estate.

Another respondent requested that FES clarify Deer Management Qualification, Deer Stalking Certificate, Competence and Quality Assurance in the document.

Several respondents suggested that FES’s deer management budget for its deer management operations should be maintained. Other respondents felt that FES deer management costs and overheads are too high.

One respondent asked that FES provide a detailed breakdown of FES expenditure on its deer management activities and fencing.

**FCS Response: We will:-**

- **Ensure the document reflects the full range of sustainable deer management activities and best practice delivered on the National Forest Estate, and also recognises the part FES’s has to play nationally in raising public and deer sector awareness of the high standards achieved.**
- **Include an explanation of our use of volunteers (assistants) to assist Wildlife Rangers.**
- **Clarify Deer Management Qualification, Deer Stalking Certificate, Competence and Quality Assurance in the document.**
- **Provide a detailed breakdown of FES expenditure on our deer management activities and fencing.**

As part of its business planning process, and the need to work within budgetary constraints, FES reviews its staffing complement annually, including the Wildlife Ranger team. The draft document aims to explain our current position regarding Rangers and Trainee Rangers. Depending upon the needs of the local District, some of our Rangers are involved in conservation work or the
management of other wildlife species, as well as deer management.

We monitor the work of the FES deer management contractors to ensure they deliver the same high standards as the Wildlife Rangers, and their productivity in terms of achieving cull targets and reducing deer damage impacts on the National Forest Estate.

The resource for training by FES is very limited and therefore targeted at FES staff. There is some limited training of SNH staff and FES contractors involved directly in deer management on the NFE. Any training provided however is paid for by SNH and the contractors themselves. Some of the national deer organisations offer training in deer management for the deer industry.

We believe that implementing and raising awareness of best practice is an important aspect of our role as a significant manager of deer.

FES requires all deer stalkers operating on the NFE to be qualified to DSC 1 & 2 in order to ensure a high degree of consistency in terms of operator knowledge, standards and safety. We consider this to be very important given the NFE ‘backdrop’ which is a working and recreational environment with a large number of operatives and a high level of usage by the public taking part in a wide range of activities throughout the year.

Through its business planning and review processes FES continually works hard to assesses its programmes and budgets taking into account the changing operating environment, adapting its practices and costs accordingly.

**HOW WE MANAGE DEER**

A number of respondents considered that FES currently makes a significant contribution to the delivery of the objectives of Scotland’s Wild Deer a National Approach, reinforcing the principles of sustainable deer management in Scotland. Another respondent proposed that FES, along with FCS and SNH, should take a lead role Scotland-wide, to provide commitment and funding for the sustainable management of the Scottish deer populations. The same respondent felt that FES should express a clear statement of how it will influence the deer industry to ensure deer populations stabilise Scotland-wide.

One respondent suggested that FES should consider using feedback from this consultation to help produce an FES deer management strategy document identifying management directions and measures that FES and its partners might adopt if they also work towards sustainable deer management.
Two respondents called for FES to be more specific about its long term aims with regard to its deer management. Another respondent felt that FES should assess how current deer management practices may have to change in the medium to long term to deal with future pressures and challenges in terms of resources and priorities within the National Forest Estate. It should consider a summary of the range of deer management models, with their suitability, for the National Forest Estate.

A number of respondents were keen for FES to continue taking a landscape-scale, holistic, integrated and ecosystem-based approach to its management of wild deer in order to deliver ecosystem services and aspects of the Scottish Government’s Land Use Strategy, asking that we expand on this topic and explain it better. Two respondents suggested that we should provide more detail on what we plan to do to support landscape-scale partnership approaches to deer and land management and connectivity of designated sites. Another respondent asked that we use maps or illustrations to provide an example of the ecosystem approach to deer management and delivery of multi-purpose benefits across a large area.

Two respondents suggested that FES should improve its forest design, based on soils and vegetation types, to better facilitate the effective management of deer, although an improved forest structure could result in increased fecundity in woodland deer.

A number of respondents support and want FES to continue taking an evidence-based approach to its deer management activities and felt that its deer management statistics and scientific data is very useful and should be further utilised and shared.

Three respondents suggested that more effort is required in deer population modelling and cull planning for the National Forest Estate. One of the respondents felt that in so doing, FES should take into account the average weights and health of the deer within the populations. One respondent felt that FES should clarify its view on the uses of scientific methods to estimate deer numbers on the ground.

Two respondents want FES to explain how the reduction in damage to leading shoots in young trees on the National Forest Estate is going to be achieved. The same respondent, plus one other, felt that FES should identify more specific actions that will be taken to reduce browsing pressures across the National Forest Estate.

One respondent felt that ‘other herbivores’ should include blue and brown hares. Another respondent suggested that we include wild boar since they also cause damage impacts, with boar likely to become a potential management issue.

Another organisation felt that FES should consider providing further analysis of deer management options with clear distinctions between current and future directions of FES deer management eg the management of open land on the National Forest Estate, indicative deer
management costs at the national scale, and definitions for key words such as ‘carrying capacity’.

A number of respondents suggested that FES should consider additional perimeter or strategic deer fencing to alleviate cross boundary conflict. Two respondents felt that we should make more use of deer fence exclosures rather than perimeter or strategic fencing with one advocating that all restocks and all new planting sites be fenced. Yet another respondent felt that FES should make less use of deer fence exclosures and more use of effective stalking skills to manage deer since exclosures displace deer to other parts of the estate. One respondent was concerned that lengthy strategic fences prevented the movement of wild deer trying to access winter ground for food and shelter.

Several respondents suggested that FES should reduce the use of deer fencing and related expenditure where feasible. The removal of redundant fencing in key areas was considered important to the conservation of woodland grouse species. One respondent felt that we should explain how we intend reducing reliance on deer fencing and that we should make clear our thoughts on the use of electric fences. Another respondent commented that the reliance on deer fencing is a result of burgeoning deer numbers across Scotland.

One respondent stated that agreement between FES and neighbours regarding the shared construction, inspection, maintenance and costs of deer fences, was essential. Another wanted clarification on whether expenditure quoted for deer fencing represents the construction cost of fencing or the upgrading of stock/rabbit fencing to deer fencing. One respondent suggested that FES should make more use of fencing and thereby reduce the amount of culling.

Several respondents felt that FES should make full use of culling in the sustainable management of deer and reduction in damage impacts.

Two respondents called for FES to commit to using copper or non-leaded ammunition in all its deer management operations. Several respondents felt however that FES should consider carefully the pros and cons of non-leaded ammunition for recreational stalkers on the National Forest Estate and that we should consult with stakeholders, including recreational stalkers, regarding the implications for users of .243 calibre rifle plus the costs of non-leaded ammo. The results of any new trials by FES should be written-up and published. One respondent wanted clarification on whether lease/permission holders (‘relevant stakeholders’), would be consulted by FES regarding the use of non-leaded ammunition.

One respondent called for the reliance on out of season and night shooting to be more widely incorporated into deer management policy. Several respondents on the other hand felt that FES should place less reliance and make less use of out of season shooting and night shooting on the grounds of deer welfare and venison quality.
FCS Response: We will:-

- Be more specific about our long terms aims for deer management on the NFE.
- Elaborate on the landscape-scale, ecosystem services approach to deer management, giving an example.
- Recognise the considerable benefits of evidence-based decision making when applied to deer management and make increased use of data and statistics in the document.
- Recognise in the document the benefits of developing deer population (deer density), modelling to aid cull planning for the National Forest Estate.
- Comment on the use of scientific methods to estimate deer numbers on the ground.
- Explain how we hope to achieve a reduction in overall browsing and damage to leading shoots in young trees on the National Forest Estate.
- Include blue and brown hares in ‘other herbivores’.
- Elaborate on damage impacts caused by wild boar.
- Comment in the document on the use of electric deer fences on the NFE.
- Indicate our intention to summarise the results of any new trials by FES on our use of non-leded ammunition.
- Confirm that recreational stalkers on the NFE will be consulted regarding the future use of non-leded ammunition for leases and permissions on the forest estate.
- Include feedback from the consultation in our development of a deer management strategy for the NFE for the period 2017-20. This will take into account the identification of challenges and management directions, measures and options that FES and its partners might adopt in future in their efforts towards sustainable deer management and responsible land management, including the management of open ground.

SNH and FCS are respectively responsible for the Scotland-wide regulation and direction of deer and forest management in Scotland. FES will work positively with both organisations to raise awareness and promote sustainable deer management. Through its management of deer on the National Forest Estate FES will demonstrate practical application of industry best practice and high standards, including assessment and proactive management of the deer populations to densities compatible with FES management objectives.

Forest design on the NFE is based on Ecological Site Classification which takes into account soils and vegetation types. The Wildlife Ranger teams input directly to the design planning process, commenting on tree species choice, fencing, open ground, deer glades and all terrain vehicle track requirements.

As a result of our deer carcass preparation and inspection processes and our Wildlife Management System we have accurate,
historical data on carcass weights and an indication of general health of the NFE deer populations.

We make full use of the range of options for deer fencing ie perimeter/strategic fencing, exclosures and electric fencing. We construct, inspect, maintain, repair and remove deer fences. The use of fencing and/or in combination with deer culling is decided locally, at landscape-scale, forest block and coupe level, on a case by case basis taking into account a range of factors including neighbouring land uses.

Our aim is to make full use of deer culling to manage deer damage impacts on the NFE, using perimeter/strategic fencing where appropriate, particularly where we march with sporting interests, and using deer exclosures only sparingly, where this is necessary.

Given that deer browse trees and vegetation throughout the year, we believe that out of season and night shooting are valid and useful means of culling deer to manage deer damage impacts when damage is occurring. Night shooting also reduces the interface between stalkers and other forest users and operatives. Wildlife Rangers, contractors and recreational stalkers who participate in out of season and night shooting apply the appropriate best practice and standards. We are not aware of any related issues regarding deer welfare or venison quality on the NFE.

SAFEGUARDING THE WELFARE OF DEER AND THE WIDER ENVIRONMENT

One organisation made the point that the document assumes that management of deer is widely accepted when in fact there are large numbers of people opposed to the killing of deer and the scale of culling and these people are not regarded by FES as stakeholders. There is not enough information provided to justify the scale of culling or cost of culling against non-lethal methods of culling such as contraception or baits. FES commitment to use trained, qualified and supervised stalkers is a good thing but the use of out of season shooting is regrettable.

One respondent suggested that FES should include the management of deer disease eg Chronic Wasting Disease, in its contingency planning.

Another felt that FES should refer to deer vehicle collisions as road traffic accidents because accidents involving deer do not always involve collisions but can still have serious consequences. One respondent felt that reducing deer numbers would not reduce the number of road traffic accidents and that accident hot spots should be identified and alternative methods such as signage, roadside reflectors, scarers, fencing and ultrasonic whistles should be used.
Several respondents felt that FES should maintain focus on its contribution to the national Sika cull.

Two respondents felt that FES may be required to help with the wider management of non-native species such as wild boar and Muntjac. One of the respondents felt that FES should play its part in preventing colonisation of Scotland by Muntjac. Another two respondents questioned why FES considered wild boar to be non-native and another queried whether beavers and brown hare should be included with non-native species.

Several respondents welcomed the FES winter incursion protocol and the improved communication and working relationships. Another respondent called for FES to make the attempt to move deer off the National Forest Estate during winter incursions, rather than resorting to culling.

Several respondents felt that we should explain the wider aspects of wildlife management on the National Forest Estate and the impacts on neighbouring land uses eg sheep farming and woodland grouse management. They also felt that FES should address the negative impacts of vermin, pests, predators from the National Forest Estate on neighbouring land uses.

FCS Response: We will:-
• Recognise in the document that there are people who are opposed to the culling of deer and the scale of deer culling.
• Recognise in the document the need for FES to refer to the management of deer disease, such as Chronic Wasting Disease or Foot and Mouth, in its contingency planning.
• Include a section on some of the wider aspects of wildlife management on the NFE.

All parties interested in any aspect of FES management of the National Forest Estate are considered to be stakeholders.

Wild deer are shy, reclusive and very mobile animals. They are very numerous and move between properties which often have differing management objectives. Deer range widely, browsing live vegetation. We believe it would be extremely difficult, if not impossible to administer contraceptives or bait in their natural environment and to have any measurable or sustained effect. The deer would still be present in the forests for several years, continuing to cause browsing damage.

FES is committed to maintaining focus on its Sika cull.

FES is committed to working with SNH regarding the management of non-native species, including potential colonisation by Muntjac.

FES is working with organisations such as Transport Scotland, SNH and Lowland Deer Network Scotland to agree appropriate methods for reducing road traffic accidents involving deer.
The ‘Deer Management – FES Protocol for Managing Emergency Situations on the National Forest Estate’ outlines the protocol agreed in 2011 with the Association of Deer Management Groups. Moving deer is one of the options which may be considered.

DEER STALKING ON THE NATIONAL FOREST ESTATE

One respondent felt that FES should emphasise the health and well being benefits to recreational and accompanied stalkers provided by FES’s leases or permissions.

A number of respondents called for FES to create more stalking opportunities or stalking schemes, such as the BASC scheme on Arran, for recreational stalkers on the National Forest Estate.

One respondent felt that deer management permissions for recreational stalkers should be a minimum of 5 years to allow stalkers to become more efficient and effective.

FCS Response: We will:-
- Include in the ‘Supporting Social Well Being’ section of the document emphasis on the health benefits of recreational and accompanied stalking to participants.
- Strengthen the emphasis on the review and identification of suitable and appropriate opportunities for additional recreational stalking on the National Forest Estate.

Permissions are allocated on a one year plus one year basis, up to a maximum of 5 years, in order to allow regular review and re-tendering if this is deemed appropriate. This approach allows new stalkers the opportunity to bid for an area and, we believe, spreads the benefits of stalking to a wider audience.

VENISON

There was recognition that FES as the biggest supplier of deer carcasses to the venison industry, works to high standards of venison quality and presentation. This included acknowledgement that FES views venison as an important income stream important to local and national markets and fits in with Government policy and healthy eating.

A number of respondents felt that FES should:-
- continue to provide leadership and the delivery of; high standards of venison supply, quality assurance and marketing-chain best practice, and to promulgate this to the wider deer/venison industry.
- promote the benefits of venison as a healthy food and the linkage of FES venison supply with Scottish Wild Deer a National Approach objectives.
• continue supporting and contributing to the venison initiatives as well as best practice events.

One respondent suggested that FES should encourage the marketing of its Roe venison supply to the home market, rather than the export market. Two respondents suggested that we take the opportunity to take more of our annual stag cull in early season (July/Aug), to provide quality venison to the markets when most needed.

One respondent suggested that when FES venison contracts are up for renewal that local Deer Management Groups be made aware of any potential opportunity to facilitate wider collaborative marketing and use of larder sharing within a Group area.

One respondent called for FES to consider:-
• ‘feeding out’ and ‘live capture’ of Red deer from the National Forest Estate to supply the developing deer farm industry, with FES carrying out a cost analysis.
• the use of existing deer exclosures around unplanted open areas as deer fenced enclosures for deer parks or deer farms.

The same respondent plus one other suggested that we should consider managing unplanted areas of the National Forest Estate as deer parks or deer farms to contribute supply of venison to the growing UK market when most needed, ie outwith the main culling season, with FES becoming a major player in the development of Scotland’s farm venison sector.

FCS Response. We will:-
• Strengthen the emphasis on the role of FES in maintaining high standards of venison supply, larding, presentation, marketing, supporting the industry initiatives, promulgating best practice and linking FES venison supply with SWDNA objectives.
• We will recognise in the document the benefits to the venison supply chain of culling more stags earlier in the season (July/August).

FES supplies venison direct to the game dealers and it is they who decide how and where to market their products, however, we are aware that our main purchaser is already strongly committed to developing the home market for Roe venison. In 2012/13 14,260 Roe deer were culled on the NFE.

FES is currently in early discussions with Scottish Venison Partnership regarding an assessment of the potential for, and implications of; deer parks, deer farms, the feeding out and live capture of Red deer on the National Forest Estate.
SUMMARY OF KEY COMMITMENTS

A number of comments were made by respondents but are mostly incorporated in the sections above.

Some respondents were not convinced that FES could deliver its commitments and were not convinced that FES truly views wild deer as an iconic and keystone species. Heavy culling, use of contractors, out of season and night shooting are not the way forward.

FCS Response.

FES values deer as an iconic and keystone species but must proactively manage deer in order to manage deer damage impacts and thereby protect the interests of the many other plant and wildlife species on the NFE, as well as deliver a wide range of management objectives. We believe the culling of deer, use of contractors, out of season and night shooting to be valid and necessary methods of managing deer and which help FES manage deer damage impacts across the NFE.

Forestry Commission Scotland
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