

# **Natural Environment Bill (Part 4)**

## **PACT Deer Practitioners Session, 21 May 2025**

### **Introduction**

The session brought together 14 deer management practitioners from diverse backgrounds across Scotland, spanning a range of geographies, ages, land management scales, and levels of experience. Participants were split into three groups, and discussions were grouped into 6 different themed sections. Though views varied by region, there was a consistent call for clarity, evidence-based policy, and meaningful consultation.

### **Theme 1: Public Interest**

Participants expressed concern about the lack of a clear, consistent definition of “public interest” in the Bill. While some felt that a definition would help clarify policy aims, others feared it could become too rigid or exclusionary over time. There was broad consensus that geographic and ecological context matters greatly - what’s in the public interest on a remote Highland estate may be very different from what matters in the central belt. Namely, because the economic and social interests of areas vary as well as the ecology of an area.

Some noted that the Bill seems highland-centric, and that smaller landowners, particularly in the south of Scotland, often lack the resources to engage with public interest tests in the same way as larger estates. Urban and peri-urban deer issues are also increasingly relevant, yet underrepresented.

Participants urged the Scottish Government to provide guidance to help interpret the concept of public interest in practical terms.

### **Theme 2: Environment and Advisory Panels**

There was general support for placing greater emphasis on the environment, though participants questioned what exactly the term means in the Bill - whether it refers to ecological integrity, biodiversity, or something more nebulous.

Concerns were raised about applying uniform deer density targets without proper habitat baseline assessments. Many noted that site-specific data is crucial - landscape, fencing, agricultural use, and water features all dramatically alter appropriate deer levels. Several participants cited a lack of robust habitat assessments, and believed current monitoring efforts often overemphasise deer impact while neglecting other herbivores like sheep.

On advisory panels, most welcomed NatureScot’s active involvement, though concerns were voiced about potential conflicts of interest. Some saw NatureScot as previously acting more as a mediator than a decision-maker. While their involvement may add weight to the panels, others warned that their dual role as regulator and participant could undermine trust unless carefully managed.

### **Theme 3: Code of Practice**

Practitioners were generally positive about the current Code of Practice, with many viewing it as a useful, embedded part of their working lives. However, views diverged on how widely and actively it is used - some refer to it regularly as a benchmark for best practice, while others admitted to rarely revisiting it unless necessary.

There was a strong consensus that any future revisions must involve full consultation with the sector, and that frequent updates would be unhelpful given the long-term nature of deer management. The Code was seen as fit for purpose, provided it doesn't expand NatureScot's powers without clarity or consensus.

### **Theme 4: Grounds for Intervention**

This was one of the most contentious areas. While many participants thought that a move to nature restoration was a good and necessary goal, many participants also felt the Bill grants NatureScot overly broad and vague powers to intervene without a clear burden of proof or baseline data. Practitioners emphasised that meaningful intervention should be based on transparent evidence and agreed metrics, warning that without this, trust could erode.

Some feared that the "goalposts keep shifting", from habitat condition to deer density to ambiguous notions of "restoration", making compliance difficult. Concerns were raised about new targets being imposed without local consultation or consideration of existing efforts. There was a call for practical, site-specific management grounded in ecology, not political shifts or blanket assumptions.

Many noted that deer management groups have made significant progress in recent years, particularly in the Highlands. However, the expansion of species like roe and sika deer, especially in areas lacking coordinated management, poses growing challenges. Sika, in particular, were described as "almost out of control", with a lack of national data and response.

There was also a strong call to acknowledge other sources of grazing damage, especially from sheep, and to avoid unfairly scapegoating deer.

### **Theme 5: Control Measures**

Opinions were split amongst the groups. Some practitioners felt current measures were sufficient and that new proposals represented "solutions in search of a problem." Others acknowledged that deer management plans and Section 7 agreements, once seen as signs of failure, are increasingly accepted and understood as tools to access government support.

Concerns included enforcement capacity, particularly if measures are binding on future landowners or if NatureScot's powers expand without adequate staffing. Many feared a loss of voluntary cooperation if the new framework feels too top-down or punitive.

There was a recurring view that any intervention powers must be accompanied by adequate support, particularly for small landholders.

## **Theme 6: Authorisations and Competence**

Most participants felt the current authorisation system functions adequately. However, proposed changes to make competence requirements mandatory were seen as potentially exclusionary, particularly for low-income individuals or those working part-time. Concerns were raised about the cost of qualifications (e.g. DSC2) and firearms certifications.

Several participants questioned the quality and rigour of some existing qualifications, especially regarding night shooting and called for improved training and safety standards. Overseas qualifications were described as often more rigorous, prompting suggestions that mutual recognition should be considered to ease burdens on staff guiding visitors.

## **Theme 7: Venison**

Venison was seen as an underutilised opportunity. The Bill was criticised for focusing heavily on regulatory “sticks” rather than offering positive incentives to support communities. Participants advocated for greater Scottish Government investment in marketing venison, school procurement, and processing infrastructure (such as larders), which many said would increase cull capacity and local uptake.

There was debate about promoting venison as a premium product. While some felt this could alienate wider markets, others emphasised that raising the price per kilo was essential to making culling economically viable.

The current licensing system for venison dealers was criticised as ineffective. The Scottish Quality Wild Venison scheme was viewed more favourably, and there was broad support for a joined-up national approach to promote quality and accessibility.