

# **ADMG, Environment LINK, SLE & Scottish Venison**

## **Submission to Rural Affairs & Islands Committee**

Through discussions fostered by the Common Ground Forum, key organisations involved in the deer management sector (Association of Deer Management Groups, Scottish Environment LINK, Scottish Land & Estates and Scottish Venison) have recognised four major areas of the draft Natural Environment Bill where there is consensus.

### **1. Section 6ZB Case Studies**

We are looking for clearer definitions and clarification as to how a possible 6ZB application would be applied in practice and for open-ness and transparency of process. We have already asked for this exercise to be conducted at the NatureScot-convened Deer Management Round Table.

- ***We ask the committee to support the development by NatureScot of a series of case studies setting out a range of scenarios covering possible 6ZB application in upland, lowland, woodland/forestry and peri-urban areas.***
- ***Recognising that much of the detail of the use of 6ZB will be contained in a new Deer Code, we ask that all key stakeholders are fully involved in its development.***

### **2. Venison**

ADMG, LINK, SLE and SV see considerable potential for venison to support a wide range of benefits for restoring nature: contributing to local economies; and to public health and well-being<sup>1</sup>. This potential can only be realised by greater public investment in capital infrastructure and the supply and marketing of venison. We argue that the value of this will be more than realised in public savings elsewhere and through the wider public benefits that will accrue. As Parliament considers Part 4 of the Natural Environment Bill, we jointly urge that the following steps are taken by the relevant public agencies working in tandem with the deer sector.

#### **2.1 Support the increase in the annual deer cull with a venison subsidy**

The Natural Environment Bill envisages a significantly higher annual deer cull to contribute to nature's recovery. With limited income to support the costs of lifting the

---

<sup>1</sup> [A venison subsidy is a positive and unifying issue for deer management in Scotland](#)

cull above current levels, other than the very low returns from venison sales, every extra deer culled incurs a net cost, regardless of venison value, of around £1 per kg for red deer; far more for roe deer. Using public investment to increase the return to deer managers from venison, as for other red meat production, has the advantages of placing tangible value on this activity whilst also maintaining high welfare and hygiene standards.

Data gathered on the net costs of deer management, which will be published soon, indicate that the costs of the increased cull could be readily covered by the budgets of existing land management support such as the Forestry Grant Scheme. Our joint proposal was estimated to have a cost of £3-5m pa if paid at £1 per kg on female and juvenile cull<sup>2</sup>. Three deer management incentive schemes were piloted in 2024 by the Cairngorms National Park Authority and NatureScot. We firmly support these initiatives, and the announcement by Mairi McAllan<sup>3</sup> in April 2024 that these would be built upon to develop a national scheme which incentivises increased management and investment in the venison supply chain<sup>4</sup>.

- ***We ask that the pilot venison schemes be developed with deer managers in the scheme areas, with a view to extending this to a national scheme by 2027.***
- ***We ask that if the pilots are for any reason discontinued then serious consideration should be given to a venison support scheme as opposed to a headage payment.***

## **2.2 Invest in venison marketing to increase demand and revenue to reinvest into sustainable deer management**

Wild venison is a healthy, sustainable and distinctively Scottish food product. Its potential to become a high-quality commercial product that can be sold at a variety of price points both at home and abroad is undeniable. Investing public money in marketing beef and lamb has long been recognised as an impactful way of drawing higher revenues into the farming and livestock sector. Extending this approach to venison would leverage income to the deer sector in the same way, noting that venison was included into the recent Agriculture and Rural Communities Act. As the market value of venison rises, it will begin to replace the need for a public venison subsidy, offering the prospect of phasing out that funding support over time.

---

<sup>2</sup>[Joint letter from Scottish Venison, Scottish Environment Link and the Association of Deer Management Groups](#)

<sup>3</sup><https://www.parliament.scot/-/media/files/committees/net-zero-energy-and-transport-committee/correspondence/2024/climate-policy-update-sg-18-april-2024.pdf>

<sup>4</sup> [Venison Subsidy for Scotland -Joint Statement ADMG, LINK & SV](#)

- ***We ask that sustained marketing support, akin to Scotch Beef and Scotch Lamb, is planned and delivered for Scottish Wild Venison.***

### **2.3 Support the venison sector through increase in processing capacity**

Almost 20 facilities, mostly lowland, will have received or be receiving support through two pilot schemes to extend larder/chill provision in areas where such facilities are in short supply. After review and if these ventures are seen to be delivering an increased cull, then this support should be extended to embrace both lowland and upland enterprises particularly in areas where little or no provision currently exists.

- ***We ask that following a review of the current schemes to support venison processing infrastructure and if deemed successful in delivering an increased cull, then these are extended to other upland and lowland areas over the next five years.***

### **2.4 Invest in Quality Assurance and skills training to support buyer confidence**

Supply chain 'end-to-end' quality assurance is fundamental to consumer confidence. Scottish Quality Wild Venison is in the process of reviewing its longstanding and widely used producer QA scheme and extending its verifiable quality scheme to cover processors of all sizes also. However, there is a need for investment in training in meat handling and in facilities for storing and processing carcasses to allow more deer managers to put venison into the food chain with verifiable quality. By supporting training and adding a minimum level of competence in wild venison handling to Deer Stalking Certification level 2 requirements, we would immediately begin to raise standards and improve the scope for higher culls in the lowlands and uplands alike.

- ***We ask for government funding support for skills training.***

### **2.5 Venison Dealers License**

We agree that the effectiveness of the Venison Dealers Licence is limited by current arrangements.

- ***We ask that they should remain until a better system is implemented in their place (e.g. the Deer Management App being developed by NatureScot – see Section 4) to ensure traceability and clamp down on rogue sales/grey/black market.***
- ***Furthermore, we ask that the opportunity should be taken to rationalise the respective public bodies and that alternatives should be looked at which might mean moving to a single responsible authority with oversight of the whole venison sector.***

### 3. Deer Management Incentives

Delivering and maintaining the deer population levels stated in the Government's Scottish Biodiversity Strategy Delivery Plan will require increased deer management efforts that will not be supported by income from sporting sales. However, we note that significant gains in woodland expansion are likely as deer impact levels decrease, while costs data on current deer management activities indicates that the funding needed to achieve the additional cull falls well within the scope of the current Forestry Grant Scheme budget. This potential is such that supporting the intended increase in the national deer cull with approximately a quarter of the FGS budget would deliver the Government's woodland expansion target through natural woodland regeneration while also supporting a Just Transition for Scotland's essential deer management workforce.

- ***To ensure a Just Transition for the livelihoods and communities impacted by a significant and sustained reduction in deer numbers, we ask that adequate funding mechanisms are put in place to support deer managers and landscape scale collaborative initiatives through future Rural Development Funding or other such relevant funding mechanisms.***

### 4. Data Collection & Sharing

The sustainable management of deer, at landscape scale, will require robust and accurate provision of data, particularly in lowland, woodland and peri-urban areas where there is currently a significant gap. We need one system for data collection and presentation for the whole of Scotland, which can be easily interrogated and interpreted by deer managers to inform the delivery of sustainable deer management and venison provision to market. NatureScot is currently in the process of developing an App which could facilitate this.

- ***We ask that consideration is given by NatureScot and FLS to setting out one single and clear national standard of deer management data collection and provision. The range of data collected, for example for the disposal of carcasses, should be combined into one system to fulfil all the key requirements, both for deer management practitioners and for public authorities.***

23<sup>rd</sup> April 2025

Tom Turnbull, **Chair, Association of Deer Management Groups**

Duncan Orr-Ewing, **Convener of Deer Group, Scottish Environment LINK**

Ross Ewing, **Director of Moorland, Scottish Land & Estates**

Richard Cooke, **Chair, Scottish Venison**