

Mr Rob Gibson MSP  
Convener  
Rural Affairs, Climate Change and Environment Committee  
M4.06  
The Scottish Parliament  
Edinburgh  
EH99 1SP

19<sup>th</sup> June 2015

Dear Rob

### **Deer management at Ardvar**

The letter of 18<sup>th</sup> May 2015 submitted to your committee by Susan Davies, CEO of SNH on deer management has just come to my attention. I would be grateful for an opportunity to provide clarification to your committee members on point 6 of the 'Ardvar Section 7 progress' briefing note.

*The note states: 'JMT remains opposed to fencing on a designated site in order to achieve favourable condition. FCS is meeting JMT on site on 17 June to discuss options on fencing/planting. If JMT retains its opposition to the woodland management plan, and we cannot reach agreement over method/timescales etc., we may need to take enforcement action via the Land Management Order (LMO) route. The LMO is the appropriate enforcement route as a S8 Order won't pay for fencing. Before we take any enforcement action SNH would need to have offered JMT a Management Agreement'*

When I met with Environment Minister Paul Wheelhouse on 30<sup>th</sup> September 2014, and with subsequent meetings with SNH, it was agreed that JMT could only *consider* fencing proposals on the designated site on Quinag if these were presented alongside a deer management plan and a draft section 7 agreement. Our understanding is that fencing is not the preferred ecological option of SNH and is only proposed as a temporary measure to allow the deer population to be brought down to a more sustainable level compatible with the designated site. The plans to achieve this are essential before fencing can be considered. To date we have yet to see either a draft deer management plan or a draft Section 7 agreement and are therefore unclear as to the cull levels proposed or mechanisms (e.g. close season culling) that will be available to manage the deer population. It is unfeasible to agree on a fencing proposal in isolation.

For clarification, JMT's opposition to fencing the designated site to protect existing regeneration is based on three areas of concern:

- Sustainability. Fencing treats the symptoms and not the cause. It merely concentrates deer impacts elsewhere and pushes the burden of management into the future.

- Cost to the public purse. SNH's fencing proposals will cost the public purse hundreds of thousands of pounds in order to protect the sporting aspirations of a private estate who does not take out paying guests. Legislative powers currently exist to compel owners to reduce deer numbers to protect designated sites at no cost to the tax payer.
- Precedent. If the answer to deer damage on this designated woodland site is fencing, then we are concerned that this could be applied on other woodland designated sites in Scotland, many of which are in unfavourable condition.

In a wider policy context we are also concerned that the fencing option on Ardvar is only being considered because of perceived socio-economic impacts on sporting estates. Yet the recently published 'Scotland's Wild Deer: A National Approach (WDNA) Reviewed 2014' states: *'Where resolving tensions between priorities at a local level is not possible and Government involvement is needed, this intervention will prioritise maintaining healthy ecosystems.'*

Yours sincerely



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cc Mrs Susan Davies, Chief Executive, Scottish Natural Heritage,  
Dr Aileen McLeod, Minister for Environment, Climate Change and Land Reform