

E-MAIL FROM: John F. Robins, Secretary, Animal Concern Advice Line (ACAL), c/o Animal Concern, Post Office Box 5178, Dumbarton G82 5YJ. Tel 01389-841111. Mobile: 07721-605521.
Animal Concern Advice Line (ACAL) is a recognised Scottish charity: No. SC030982. Animal Concern Advice Line was established in 2001 to take on the charitable work of Animal Concern which was founded as the Scottish Anti-Vivisection Society in 1876.

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Roseanna Cunningham MSP,
Cabinet Secretary for Environment, Climate Change & Land Reform,
The Scottish Government,
St. Andrew's House,
Regent Road,
Edinburgh,
EH1 3DG

Dear Cabinet Secretary,

Please accept my belated congratulations on being re-elected and on obtaining your post as Cabinet Secretary for Environment, Climate Change & Land Reform.

Since the establishment of the new Scottish Parliament I have been lobbying for the environment and agriculture & fisheries to be given separate portfolios. Previous Environment Ministers had to play both poacher and gamekeeper. It was disconcerting to see Environment Ministers arguing for increased catch quotas in Brussels or using the word "sustainable" multiple times in press releases aimed at boosting foreign sales of salmon reared in our far from sustainable and mainly foreign owned salmon farming industry.

It has also greatly concerned me to see Environment Ministers taking advice from very biased "stakeholder" groups. During the production of the legislation which replaced the 1970 Conservation of Seals Act in Scotland advice was taken from an advisory group of organisations which was nearly 3 to 1 biased in favour of pro seal culling organisations. Despite knowing the 1970 Act inside out and having brought the only successful prosecution under that Act I was refused membership of the advisory group on the new legislation.

Last year I had to make a public request to the Environment Minister before an advisor on wild salmon conservation legislation who had earlier in the year pled guilty in court to multiple counts of breaching wild salmon conservation legislation was stood down from his position as advisor to the Government on wild salmon conservation legislation.

About a year ago your predecessor addressed an event organised by the Scottish Gamekeepers Association (SGA). At that event she thanked the SGA "for all the long term support which you have provided to Scottish Government in various areas of policy, development and implementation and making sure we are implementing best practices of conservation and wildlife (sic) and wildlife management...". After she made that statement I asked Dr. McLeod if she would ask the SGA if any of the gamekeepers convicted of wildlife

crimes including illegally killing birds of prey in Scotland were members of the SGA. My request was refused. If you are to take advice from the SGA on wildlife conservation I ask you to please put that question to the SGA.

There are several outstanding issues which I hope you will be able to resolve in the near future. We had been promised a decision by the end of 2015 on whether or not beaver would be given legal protection in Scotland. At the moment wild/feral beaver in the Tayside area have no protection and are being shot all year round. Carcasses autopsied by the Royal Zoological Society of Scotland show that lactating females have been shot leaving their kits to suffer a slow death from starvation. I ask you to at least bring in a close season for shooting beaver until a long term decision on their future can be taken. The main reason beaver are being killed is because farmers claim beaver dams are undoing the work of farmers who have drained ground to create arable fields in the upper reaches of the Tay catchment. I hope that consideration will be given to the possibility that this artificial field drainage has contributed to flooding problems further downstream and the beaver dams may be restoring the natural balance.

I am not sure where it might come under your remit but, after it was discovered that lions and tigers were being overwintered (2014/2015) in tiny travelling cages on an Aberdeenshire croft, we were promised action to outlaw the use of "wild" animals in circuses in Scotland. Can you give me any idea of when this issue might be dealt with?

For many years we have been calling for a review of the General License system for "managing" over 20 species of native wild birds. I raised this within the Cross Party Group for Animal Welfare and a senior employee of SNH addressed the Group. When I questioned him on the issue the MSPs present appeared surprised to learn that anyone, after simply reading, understanding and complying with any of the many varied General Licenses on the SNH website can legally go ahead and kill an unspecified number of 20+ species of wild birds. The main reason for killing these native birds is to protect birds, including non-native pheasant, being raised to be shot by paying guns.

In the very near future you may be asked to add Ravens to the species of birds covered by the General License scheme. The main reason being given for this is that farmers claim Ravens kill healthy lambs. I have spoken to someone who closely studied the interaction between Ravens and hill lambing sheep. I have also viewed video and photographs which are claimed to show predation on lambs by Ravens.

From the evidence I have seen and heard Ravens are most likely to be scavenging on afterbirth and the large number of hill lambs which are stillborn or die soon after birth due to adverse weather conditions. A healthy sheep could chase off Ravens but instead have been seen to allow Ravens to pick out birth debris from their fleeces, a bit like large fish allowing cleaner fish to clean them of parasites. A recent published photograph purporting to show a lamb with its eye pecked out appeared to show a lamb with a cataract or similar damage to an intact eye.

Before allowing Ravens to be added to the General Licences I ask that farmers be asked to provide the carcasses of Raven predated sheep and lambs to SAC for autopsy to determine cause of death and whether any damage by Ravens was inflicted before or after death.

In the very near future you will be asked to consider a consultation which closed in December last year and decide whether or not to give legal protection to the large seal colony near the mouth of the river Ythan. For the last three months we have been getting numerous reports of members of the public disturbing seals hauled out on the sands near the mouth of the Ythan.

The main problem has been people getting very close to hauled out seals to take selfies of themselves with the animals. Sadly, despite some warning notices which people either don't see or choose to ignore, the seals are being disturbed and the amateur photographers are putting themselves at risk of injury. At least one person has flown a camera drone low over the seals. This caused the seals to panic and pups were put at risk of being crushed or abandoned.

Last month a young man deliberately threw a ball at a large hauled-out seal and then sent his pal to recover the ball which was only inches away from the seals head and canine teeth.

We have not had any reports of people deliberately trying to harm the seals but their irresponsible behaviour is disturbing and displacing the animals.

I urge you to give these seals extra protection in order that people can, if necessary, be penalised for harassing and disturbing the colony.

My apologies for the length of this e-mail but I had to raise the outstanding matters which you inherited from your predecessors. I will be in touch in the future and I hope our communications can be constructive rather than negative or combative.

I hope you agree that protection of our environment and all the creatures (including humans) which inhabit it is above political point scoring and it is essential to try and make the right decisions to foster long-term recovery and sustainability of our fragile ecosystem.

Yours sincerely,

John F. Robins,

Secretary to ACAL