

Monday, 26 January 2015

Consultation on the Future of  
Land Reform in Scotland,  
Land Reform Team,  
B1 Spur,  
Saughton House,  
Edinburgh EH11 3XD

Dear Sir or Madam,

Enclosed is my completed response form to the Consultation on the Future of Land Reform in Scotland which I would like you to consider along with this letter as Animal Concern's submission to the consultation. I found that some of the response boxes were far too small and I am concerned that the fixed question short response format restricts input and may influence the outcome of the Consultation. I also include our Respondent Information Form.

Founded in Glasgow in 1876 Animal Concern campaigns for protection of Scottish wildlife and the environment that wildlife inhabits in our cities, towns and countryside.

Abuse and misuse of land in Scotland not only adversely affected the human population, it drove some native species of animals and birds to local extinction and continues to greatly suppress numbers of many indigenous creatures while artificially inflating the numbers of some animals and birds, including some which are not native to Scotland, to levels which create environmental damage and cause individual animals to suffer. Even in the 21<sup>st</sup> century some land owners and land "managers" illegally kill rare creatures such as raptors. On an even greater scale, within the law and with the assistance, and in some cases at the insistence, of the Scottish Government literally hundreds of thousands of animals and birds are needlessly killed by land "managers" every year.

Although this consultation on land reform is being carried out by the Scottish Government it is arguable that much of what is wrong in the Scottish countryside is due to the policies of this and previous Scottish Governments. Scottish Ministers condemn the illegal culling of raptors by land owners and managers but those Ministers seem unaware that a culling culture is rife within the Scottish Government and its quangos. It does not help that Scotland does not have a proper Minister for the Environment but instead tags the title to the Minister for Promotion of Farming, Forestry, (over) Fishing and Factory Fish Farming.

Scottish Natural Heritage, Forestry Commission Scotland and Marine Scotland facilitate, encourage and occasionally order the culling of animals and birds including all species of deer, grey and common seals, grey squirrels, wild goats and over 20 species of native wild birds. Even wallabies on an island on Loch Lomond are subject to culling. The Scottish Government does nothing to discourage the routine mass culling of mountain hares on and near grouse moors and the destruction of many small animals including hedgehogs, stoats and weasels in areas where they naturally eat the eggs or young of birds, including non-native pheasant, which some people shoot for sport.

One question which has always concerned me is what happens to the tens of thousands of deer that are culled each year? There was a much publicised incident in 2011 when The John Muir Trust left 40 culled red deer to rot in Glen Nevis. Once killed the deer could at least be used. Their meat is free range and organic and could surely be used in schools, hospitals and food banks to replace intensively farmed pork and poultry? We also have the ludicrous situation of Forestry Commission Scotland putting their name and logo on packs of venison imported all the way from New Zealand instead of endorsing the sale of local wild venison from the deer culling they so actively encourage in Scotland.

The main reason for killing deer is to help the regrowth of existing forest or the establishment of new forest and woodland. Not enough is done to utilise alternatives to culling including the use of sapling protectors and deer fencing. The rush to cover Scotland in new woodland has led to the planting of saplings in areas such as Tullos Hill in Aberdeen where soil and weather conditions may not sustain mature trees and tree planting could put at risk existing valuable habitat such as wild flower meadow.

One expert in woodland management told me that over-culling of deer can lead to unnaturally dense growth of weeds and grasses which can stop regeneration of woodland and in areas where saplings do take hold, they can do so at such a high density that you end up with unnaturally dense woodland of little conservation or amenity value. Browsing deer have been part of our natural ecosystem for tens of thousands of years and removal of too many deer can damage rather than enhance the natural environment.

Question 37 of the Consultation asks what disadvantages the introduction of further deer management measures would bring. I think increased culling of deer and new powers to force land owners to kill more deer could be counterproductive. Deer roam. If you kill deer in a place which is attractive to deer other deer will soon migrate into the area. The only way to keep deer out of an area is to fence it off. To protect trees only by culling you have to reduce deer numbers over a wide area to such low numbers that herds become unviable.

It would appear that the popularity of creating new woodland on the cheap, without investing in deer exclusion fencing, is resulting in over-killing in some areas with once sustainable small herds reduced to just three or four animals. Perhaps it is time to look at the massive scale of tree planting currently taking place in Scotland? Are we sacrificing native wildlife and reducing the variety in our ecosystem by planting trees in every open space? Our West Highland rail line is sold to tourists as one of the most scenic routes in the world. The last time I used it I couldn't see the views for the trees.

The most welcome proposal in the proposed reforms is removal of business rates exemption for shooting and stalking estates. I resent subsidising commercial businesses which annually kill thousands of native animals and birds to artificially increase the number of the few species of birds which they kill for sport. If someone set up a paint-ball game business in a warehouse in Glasgow they would pay business rates. Why should someone running a stag shooting business up the road in Argyll not pay business rates?

Let's not beat about the bush here – people who come to Scotland to shoot grouse and stags are not short of a bob or two. We already subsidise their sport by paying benefits to beaters and hotel workers struggling to get by on the minimum wage. If the fee for their shooting or stalking has to increase to cover business rates I doubt if many will even notice far less take their Purdey or their Remington to Cash Convertors. We must also remember that many more people visit Scotland to shoot wildlife with a Canon or a Pentax than with a shotgun or a rifle.

Animal Concern welcomes proposals for land reform in Scotland but these reforms must take into account the need to protect our native wildlife and the varied habitats our wildlife need to survive. Reforms should also look to the future, a future where the value of living wildlife will far outstrip the value of carcasses killed by a bullet or peppered with shot. The reforms should be overseen by a new body which takes in expertise from across the spectrum and not just those who see land as an inorganic investment or a playground for the affluent few.

Yours faithfully,

John F. Robins,  
Secretary to Animal Concern