

Consultation on the proposed deer management strategy

CONFOR RESPONSE TO THE DEFRA CONSULTATION

Introduction

About Confor

Confor (www.confor.org.uk) is the not-for-profit organisation for the UK's sustainable forestry and wood-using businesses. It has 1,500 members, representing the whole forestry and wood supply chain from tree nurseries to sawmills and wood panel businesses.

Confor welcomes the opportunity to comment on the key proposals being considered for the deer strategy.

Confor is a member of the Deer Initiative Partnership, a broad partnership of statutory, voluntary and private interests dedicated to ensuring the delivery of a sustainable, well-managed wild deer population in England and Wales. The Partnership met to discuss the consultation and this response is partly informed by the views expressed at that meeting.

Consultation questions

Introductory questions

Q1. What is your correspondence address?

caroline@confor.org.uk

Q2. Would you like your response to be confidential?

No

Q3. What capacity are you responding to the consultation in?

Sector trade body or membership organisation

Q4. If you are responding on behalf of an organisation, please tell us what organisation this?

Confor: Promoting forestry and wood

Q5. If you are responding on behalf of an organisation, how were your answers to the questions below determined? (For example, consultation of staff or members, senior management team input, individual, or other)

Consultation with staff and members.

Sustainable management

Q6. To what extent do you support the introduction of incentives for reducing deer impacts to protect woodland?

- **Strongly Agree**

Confor strongly agrees with this proposal. The way to incentivise deer managers to shoot more deer is to have a high market value for the carcass. An option for this would be for the government to purchase carcasses from Approved Game Handling Establishments (AGHEs) through some form of targeted incentive scheme.

However, any incentives must focus on the species and specific areas where there are known problems.

Improving the laws and regulations on deer

Q7. We propose to review and amend existing legislation to allow shooting of male deer during the existing close season. To what extent do you support this proposal?

- **Disagree**

Confor disagrees with this proposal. It is our view that it wouldn't help reduce population levels in the long term, which can only be achieved by concentrating on the female cull. There is already an option in the Deer Act for landowners who are suffering damage to control male deer during the close season. However, this legislative exemption could be made less restrictive by amendment.

Defra and its Arm Length Bodies should review the policies for issuing and enforcing licences to simplify and streamline the system, thereby enabling deer managers to obtain the necessary licence where and when it is required.

Q8. We propose to review existing legislation to either reduce or remove the licencing process to permit shooting of deer at night to enable appropriate, proportionate, and effective control. To what extent do you support this proposal?

- **Disagree**

Confor disagrees with this proposal. Defra and its Arm Length Bodies should review the policies for issuing and enforcing licences to simplify and streamline the system, thereby enabling deer managers to obtain the necessary licence to allow night shooting where it is required, subject to Best Practice Guides. The licensing system would also help prevent some of the illegitimate killing (poaching) of deer at night and the risk to public safety and animal welfare.

Q9. We propose to review deer legislation to enable landowners and managers to reduce deer damage to woodlands or to other public interests, preventing the further spread of non-native species and preventing serious damage to any form of property as well as to the natural environment and public safety. To what extent do you support this proposal?

- **Don't know**

See previous answers.

Q10. We propose to enable occupiers (tenants or owners) of land to control deer, where the deer rights are retained by the landlord or previous owner (and where serious damage is occurring to trees crops or property), particularly where these are publicly funded. To what extent do you support this proposal?

- **Disagree**

Confor disagrees with this proposal. Civil and legal disputes could likely result in cases where sporting rights and licences and leases exist. There is however a case to address the problem of those who hold the absolute rights to manage (or not manage) deer in situations in which appropriate management is not being exercised. Legislation exists providing for compensation in cases where unacceptable damage occurs and this process could be made more effective. In addition, financial penalties through existing grant schemes could be considered.

Q11. We propose to clarify the legal status of wild deer particularly in relation to enclosed deer in parks or private collections, thereby reducing the likelihood of negative deer welfare or public health issues. To what extent do you support this proposal?

- **Strongly Disagree**

Confor strongly disagrees with this proposal having consulted, informally with the British Veterinary Association and the British Deer Veterinary Association. Both organisations will be writing specifically on this issue. Confor refers to their response.

Q12. We propose a more statutory approach to landowner responsibilities for deer where they are causing significant negative impacts to neighbouring land where these are impacting upon publicly funded woodlands, biodiversity and public interests. To what extent do you support this proposal?

- **Disagree**

Confor disagrees with this proposal. Deer are not owned by anybody. If the law were to be changed this would add unwanted liability to the landowner.

Defra should encourage and support landscape scale control/collaboration historically pursued by the Deer Initiative.

Defra may wish to use the current/new grant scheme better, i.e., monitor and enforce Deer Management Plans, withdrawing grant where conditions have not been met, and mandate that all new woodland creation schemes are entered into a local Deer Management Group.

Minimising the spread and impacts of non-native deer species

Q13. Which actions would you consider, to allow more effective means of controlling muntjac to prevent them damaging woodlands and biodiversity and expanding their range into areas they are not currently present?

The current legislation is adequate regarding allowing effective control. Any proposal to change the status of muntjac would not be in the interests of deer welfare particularly regarding permitted firearms for their control. Emphasis should be placed on a landscape collaborative approach. Examples of effective management of this species exist in many parts of the country. Incentives could be considered to encourage more effective management in the areas of concern. A bounty scheme may be explored providing financial benefit to deer managers on the numbers culled. The processing of muntjac is not always commercially cost effective and therefore there may be scope for financial support for the venison market.

Deer Health, Welfare and Safety

Q14. We propose that everyone who culls deer in England has to reach the same standard. To what extent do you support this proposal?

- **Agree**

Confor agrees with this proposal with DSC1 being encouraged as the minimum. Most stalkers already have DSC1 or DSC2 and landowners often stipulate that their stalkers have the minimum level of formal training.

However, there may be a negative net result of a mandatory requirement for training in that it could reduce the numbers of deer managers available to undertake the cull required as this could act as a significant barrier to entry into the sector. The deer management sector is an aging sector and there is concern that a mandatory setting of standards may impact negatively on attracting new entrants.

Q15. What would you consider the most effective means of developing a consistent national approach to responding to deer collisions and deer welfare incidents?

There are areas of England that operate best practice DVC and deer welfare management through the local police, using trained volunteers/humane dispatchers, i.e., Hampshire and Thames Valley. Confor believes that the National Police Chief Council should be urged to standardise the approach taken by the police and adopt the Hampshire and Thames Valley across England. Consideration could also be given to amendment of Road Traffic legislation requiring RTA's to be reported and recorded for statistical purposes.

Wild Venison Market

Q16. Do you consider there are presently barriers to the development of a commercially successful wild venison market?

- **Yes**

Game Handling Establishments have tended to have control of venison prices paid which are too low thereby reducing the incentive for more deer to be culled. Large Government contracts with dealers in some areas can stifle and flood the market bringing about a lack of incentive for others to cull deer that cannot be sold. Government subsidy for the venison market and any proposed Assurance Scheme would result in an increased cull in problematic areas.

Q17. To what extent do you agree that Government should support development of the wild venison sector?

- **Strongly Agree**

Confor strongly agrees with this proposal. As stated previously where Government has incentivised market development, i.e., woodfuel or biomass, then supply chains have been set up to meet demand.

Developing and improving the Evidence Base

Q18. To what extent do you support the development of a National Deer Data Dashboard?

- **Agree**

Confor agrees with this proposal. An app-based system, similar to the badger cull app, could be developed. The app would contain basic data such as species and sex but also location shot plus destination of the carcass. This would allow the full supply chain to be examined.

Financial implications of proposed strategy actions.

Q19. Do you believe any of the proposed actions will have any positive or negative financial implications for the woodland/land management sector?

- **Yes**

There are obvious positive and negative financial implications in both pursuing good and bad deer management which have a direct bearing on the woodland/land management sector.

Q20. Do you believe any of the proposed actions will have any positive or negative financial implications for those involved in deer management?

- **Yes**

There are obvious positive and negative financial implications in both pursuing good and bad deer management. The former being positive and the latter negative.

Q21. Do you believe any of the proposed actions will have any positive or negative financial implications for wild venison production?

- **Yes**

There are clearly both positive and negative implications for wild venison production dependent on which proposals are ultimately accepted. Results of this consultation should clearly identify such implications.