Response ID ANON-FAFD-UXWV-B

Submitted to Consultation on proposals for the deer management strategy (consultation now closed)
Submitted on 2022-08-30 16:54:26

Introduction

1 What is your correspondence address? Please provide an email address or telephone number unless unable to. If you enter your email address, then you will automatically receive an acknowledgement email when you submit your response.

email address :
james-aris@countryside-alliance.org

2 Would you like your response to be confidential?

No

If ticked Yes, please state why:

3 What capacity are you responding to the consultation in?

Non-governmental organisation

Other (please state):

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

Organisation:
Countryside Alliance

5 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)

how were your answers to the questions below determined:
Senior management team, expert members and in consultation with the Deer Partnership Initiative

Sustainable management

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

Strongly Agree

If you answered Disagree or Strongly Disagree, please explain why.:

Improving the laws and regulations on deer

7 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

If you answered Disagree or Strongly Disagree, please explain why.:

• We believe that protection should be maintained for males as well as females of the indigenous species of roe and red deer in order to maintain a stable and thriving population.
• The focus must be on a female cull of non-indigenous species, as the shooting of only male deer will not reduce population levels, contrary to the proposal's aims.
• An open season for male deer only would also result in resources being focused on them, again not solving the issue.
• Landowners already have the ability to shoot male deer outside of the season by a grant of a license, therefore it is unnecessary. This licence can however be made less restrictive by amendment.
• We also have concerns that an open season will force deer to change their natural habits and will serve only to push deer to other areas, therefore not resolving the issue.

8 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

If you answered Disagree or Strongly Disagree, please explain why.:

• The current licensing system must be made more accessible and user-friendly where it is required.
• The removal of a licensing system would be detrimental to poaching prevention efforts, and create an adverse risk to public safety.

9 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?

Disagree

If you answered Disagree or Strongly Disagree, please explain why.:

• Unable to answer as further clarification is required, however other answers within this consultation may go some way in response.

10 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

If you answered Disagree or Strongly Disagree, please explain why.:

• Unable to answer as further clarification is required.
• The ability to control deer where there is an issue is important, but it must still be done in conjunction with the owner of the rights and in line with an agreed cull. What amounts to serious damage? Will there be a requirement for a licence?

11 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?

Disagree

If you answered Disagree or Strongly Disagree, please explain why.:

We defer to The Deer Initiative Partnership response.

• We both agree and disagree dependent on how this may be clarified.
• Numerous and contradictory legislation exists within this subject and some degree of clarity is called for.
• Careful consideration needs to be taken to any proposed status changes that risk being counter-productive, actually increasing the risk of negative deer welfare and public health issues.

12 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

If you answered Disagree or Strongly Disagree, please explain why.:

We defer to The Deer Initiative Partnership response.

• This proposal raises considerable concern.
• Rather than a statutory approach consideration should be given to a landscape, collaborative approach as historically pursued by the 'Deer Initiative'. This approach enables a more effective means of controlling the spread and impact of problem species in certain areas of the country.
• Consideration could be given to financial penalties or incentives via current grant schemes

Minimising the spread and impacts of non-native deer species

13 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?

free text box:

• Incentives targeted towards females, paid for by Government and administered through Approved Game Handling Establishments (AGHEs).
• This would support the ambition to develop the wild venison market as a carbon-positive healthy meat, and a product of sustainable woodland management.

Deer Health, Welfare and Safety

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

Disagree

If you answered Disagree or Strongly Disagree, please explain why. :

• There is no evidence to support this proposal.
• The sector currently self-regulates well and offers DSC1 and DSC2 qualifications, with over 50% of deer managers holding the former.
• There is no evidence that mandatory training is required.
• Introducing a minimum level will cause a financial barrier to entry that currently does not exist, and it will lead to fewer deer being controlled in the long run - contrary to the aims of proposals laid out in this document.

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

[Free text box]:

• Standardisation across police forces via Home Office issued guidance.
• This should be based on the Hampshire and Thames Valley scheme.

Wild Venison Market

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

Yes

If you answered Yes, please explain what these are.:
Anti-shooting campaigns - money (subsidise) - lead alternatives

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

Strongly Agree

If you answered Disagree or Strongly Disagree, please explain why:

Developing and improving the Evidence Base

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

Disagree

If you answered Disagree or Strongly Disagree, please explain why. :

We defer to the Deer Partnership Initiative response.

• There is support for developing and improving the evidence base dependent on how this may be achieved.
• The technology and methodology of some government wildlife control schemes to gather data could be explored.
• It may be beneficial for such development to rest with an independent body well placed to enhance data already collated e.g. The British Deer Society.

Financial implications of proposed strategy actions

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

Yes

If you answered Yes, please explain what the implications are.:

Proposals are unspecified and unclear, therefore cannot answer this question in the specific as will have both positive and negative impacts.

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

Yes

If you answered Yes, please explain what the implications are.:

Proposals are unspecified and unclear, therefore cannot answer this question in the specific as will have both positive and negative.

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

Yes

If you answered Yes, please explain what the implications are.:

Proposals are unspecified and unclear, therefore cannot answer this question in the specific as will have both positive and negative.

Consultee Feedback on the Online Survey

22 Overall, how satisfied are you with our online consultation tool? Please give us any comments you have on the tool, including suggestions on how we could improve it.

Dis-satisfied

What happens next?