



**SCOTTISH GOVERNMENT CONSULTATION:  
SIMPLIFYING THE LANDSCAPE: CONSULTATION ON PROPOSALS  
AFFECTING THE DEER COMMISSION FOR SCOTLAND**

**SUBMISSION BY  
SCOTTISH ESTATES BUSINESS GROUP**

**1. BACKGROUND**

SEBG represents a group of progressive land-based estates with significant agricultural and rural business interests. It aims to promote a modern business approach in the management of Scotland's land resource in ways which deliver social, economic and environmental benefits. The Group seeks to secure a sustainable and prosperous future for rural areas.

Estates are proven business models that assist the development of smaller rural businesses, and landowners and estates have a vital role to play in the ongoing and future development and prosperity of Scotland. SEBG is committed to rural economies and its members work hard across Scotland to stimulate enterprise and economic development.

**2. SEBG OVERVIEW OF MERGER PROPOSAL**

SEBG welcomes the Scottish Government's determination to simplify government, drive efficiencies and increase productivity. Its commitment to removing unnecessary burdens and bureaucracy in the search for more effective government is to be applauded. Its SEARS project, which aims to reduce bureaucracy and duplication across Scotland's Environmental and Rural Services, is a good example of a constructive initiative which offers the potential to reduce administrative and inspection burdens, as well as simplify the process of accessing information and guidance.

However, when such determination to trim back excess appears to put at risk the delivery of key objectives or the effectiveness of proven and practical management tools, then SEBG would urge reconsideration in the search for a more constructive way forward.

The Deer Commission for Scotland (DCS) was established in 1996 as the successor to the Red Deer Commission, charged with furthering the conservation, control and sustainable management of all species of wild deer in Scotland, and keeping under review all matters, including welfare, relating to wild deer. As such, its remit is wider than consideration solely of the natural heritage of Scotland's iconic species, and encompasses also animal welfare, food production (venison), the stalking industry (worth over £105 million to Scotland's economy each year), tourism and land use. Deer management provides significant rural employment as well as contributing to successful businesses and thriving rural communities. Indeed, red deer in particular often comprise the major form of land use over wide areas and make a significant contribution to the fragile economies of Scotland's remote communities. Clearly there are many different issues involved in effective deer management other than simply the natural environment in which the deer live.

**SCOTTISH ESTATES BUSINESS GROUP**

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It was in recognition of the increasingly complex issues surrounding deer management that the Commission was instrumental in initiating a joint working arrangement with SNH, the Forestry Commission and the Scottish Rural Payments and Inspections Directorate to investigate the factors preventing an improvement in the condition of designated priority sites. These sites have a multi-dimensional deer aspect and the proposed amalgamation of DCS within SNH would remove its ability to participate objectively in the Working Group and with the trust of the affected landowners.

SNH necessarily has a much narrower focus than DCS and lacks the balance inherent in a structure which includes an elected body of Commissioners, which ensures it is broadly representative. DCS is not only widely respected by those in the Scottish deer industry, but is also admired by those involved in the sector in other countries across Europe.

Against this background, SEBG does not see a comfortable match between the responsibilities and objectives of the two organisations. It would be no easy fit for the broad range of DCS roles - involving animal welfare, food production, employment and business activity, tourism and optimum land use – to be drawn into the confines of SNH's narrower remit of promoting and preserving Scotland's natural heritage. Indeed, a merger of these two organisations would pose potential conflict between the need to balance the impact of deer on the natural heritage and the associated deer welfare and economic implications. It would be inappropriate for a single body to be expected to balance such potentially conflicting interests.

It is of concern to SEBG, therefore, that consideration is seriously being given to a graft of the broad range of deer management issues and responsibilities onto an existing Government agency in the apparent interests of administrative tidiness rather than effectiveness and fitness of purpose.

Pragmatism would suggest, as an alternative, that the DCS might be established as one pillar of an overarching structure designed to oversee the preservation and development of rural Scotland as a whole, with promotion of Scotland's natural heritage constituted as another and separate branch. Such a Rural Development Agency would, by the way, be able to link in well with the concept of the Scottish Rural Development Plan and its delivery through Rural Development Contracts. It might also mirror the concept promoted by the example set by the Scottish Government itself of a simplified, more co-ordinated and cross-cutting approach to policy development and application.

Over the years, DCS and the structure of Deer Management Groups with which it works, has developed into a lean but effective delivery mechanism for the protection, promotion and sustainable management of all species of wild deer in Scotland, and their welfare. If change is needed in the interests of efficiency, then it should only be to a model designed for effective delivery of objectives and fit for purpose, rather than the use of an existing vehicle for reasons seemingly of convenience and expediency.

**SEBG**  
**27<sup>th</sup> February 2008**

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