

Consultation on Strategy for Wild Deer  
 Deer Commission for Scotland  
 Great Glen House  
 Leachkin Road  
 Inverness IV3 8NW

## Advocates for Animals' Response to Public Consultation on Draft Strategy for Wild Deer in Scotland

February 2008

### RESPONDENT INFORMATION

Name	Ross Minett
Organisation (if applic.)	Advocates for Animals
Address	10 Queensferry Street, Edinburgh, Scotland
Postcode	EH2 4PG
Daytime telephone	0131 225 6039
Email	ross@advocatesforanimals.org

a) Are you responding: (please place a cross in one box only)

As an individual		Please go to (b) then (d)
On behalf of a group/organisation	x	Please go to (c) then (d)

b) On behalf of groups/organisations:

The name and address of your organisation will be made available to the public (at Deer Commission for Scotland offices and website). Are you also content for your response to be made available?

YES	x	We will make your response available
NO		We will treat your response as confidential

c) How would you describe your interest in wild deer? (please tick all relevant boxes)

Employed stalker	
Recreational stalker	
Land Manager	
Community interest	
Non-Governmental Organisation	x
Public Agency	
Interested individual	
Food producer	
Other Business	
Other (please specify)	

## QUESTIONS ON CONSULTATION DOCUMENTS

Please complete as many of the following questions as you wish.

### 1. General

1.1 The overall aim of the strategy is to set out an approach to sustainable deer management which incorporates the desired environmental, economic and social wellbeing outcomes. To what extent do you think the strategy achieves this?

Fully	
Mostly	
Partially	x
Not at all	

Should you wish to expand on your response, please do so in the box below:

We believe a duty of care for wild deer should be laid down in legislation. A code has an important role to play in explaining the practical implications of the legislation although such a code should be seen as supplementing legislation, not as a substitute for it.

The draft strategy focuses on lethal deer management. We believe that non-lethal alternatives should always be considered before resorting to lethal management activities. We believe that insufficient attention has been given to non-lethal management approaches such as deer fencing, restricting winter feeding, immune-contraception and repellents that have been trialled in Europe and the USA that use natural and synthetic compounds and odours including predator odours. We believe that substantial resources should be committed to the development of alternatives to killing.

Insufficient focus had been given to the economic benefits to be gained from non-lethal activities such as deer-watching and other forms of ecotourism. Such activities are surely more ethical and better reflect the image which Scotland should be portraying in the 21st century.

Insufficient safeguards seem to be in place to ensure the highest levels of welfare. The strategy should surely incorporate a fundamental outcome of high welfare for the deer.

The draft strategy does not take sufficient account of the effects of management activities on the welfare of the deer. Most proposed management activities involve killing deer. When undertaking any killing we have a moral responsibility to ensure that this is carried out as humanely as possible. The strategy could have wide-reaching impacts on deer welfare. Ensuring good animal welfare should be an integral part of any management activities. We agree with the DCS statement that: 'A useful guiding principle in the management of free-living deer is that the greater the level of management (or the degree of intervention) and the greater extent to which this is for human benefit, the greater the moral responsibility those involved have for the welfare of the deer.' (DCS website)

The draft strategy proposes to increase the numbers of deer killed, partly by increasing the level of deer stalking, an activity often undertaken by amateurs. Surely our wild animals should not be viewed merely as a financial resource to be killed and exploited in the name of economics. Encouraging people to pay to come and shoot our deer for fun seems to be contradictory to respectful forms of ecotourism such as wildlife watching and photography. Is shooting our wild animals for fun really the image of Scotland we want to portray to the rest of the world in the 21st century?

Scotland's wild deer are all of our' natural heritage. With the concerning apparent increase in wildlife crime one must surely question what kind of message it sends out to society, and especially its younger members, that is it viewed by the law to be acceptable for people to pay for the enjoyment of killing wild animals. Research is increasingly showing links between peoples' respect and compassion towards animals and towards other human beings which raises serious concerns about the wider impact of the acceptance of activities such as killing animals for entertainment.

## 2. Context (draft strategy section 2)

2.1 Do you have any comments on the factors of change, identified in 2.3 of the consultation document, which are likely to affect the objectives of deer management in the future?

Public perceptions – This section mentions ‘animal welfare expectations’. The public would expect the welfare of deer to be given due regard and to be taken into account when any management activity is considered.

Surely the welfare of the deer themselves should qualify as a management objective in itself.

### 3. Vision (draft strategy section 3)

#### 3.1 To what extent do you agree with the vision statement?

Strongly agree	
Partially agree	
Disagree	
Strongly disagree	x

Should you wish to expand on your response, please do so in the box below:

The vision reflects a strategy for 'managing' wild deer as opposed to a strategy for wild deer.

The vision statement does not contain any reference to the welfare of the deer. Surely animal welfare should be an integral part of any management activities relating to animals.

We believe that the central principle in any management of wild deer should be that the culling of deer should be kept to an absolute minimum. Wherever possible, alternatives to culling should be used both to control the size of the deer population and as a means of avoiding damage by deer to woodlands and agricultural production. Where culling is carried out, it must be performed humanely by persons who have demonstrated that they are fit and competent to cull deer in as humane a manner as possible.

4. Key Issues to address (draft strategy section 4)

4.1 To what extent do you think the environmental issues identified reflect the key issues sufficiently?

Fully	
Mostly	
Partially	x
Not at all	

Should you wish to expand on your response, please do so in the box below:

4.2 To what extent do you think the sustainable economic development issues identified reflect the key issues sufficiently?

Fully	
Mostly	
Partially	x
Not at all	

Should you wish to expand on your response, please do so in the box below:

The focus is on economic benefits to be gained from killing deer with insufficient attention given to promoting and expanding the already-growing ethical alternatives such as ecotourism.

4.3 To what extent do you think the social wellbeing issues identified reflect the key issues sufficiently?

Fully	
Mostly	
Partially	x
Not at all	

Should you wish to expand on your response, please do so in the box below:

People in Scotland care about animal welfare. We believe that social wellbeing would be better served by promoting ethical and humane alternatives as opposed to the killing of deer.

The social wellbeing of people in Scotland would surely be better served by promoting a positive, respectful relationship between people and animals. Treating animals as commodities to be used as people wish for financial gain sends out a very concerning message to people in Scotland, especially young people. A more holistic, consistent, positive message of respect for all living things would be of great benefit to our society.

4.4. To what extent do you think the cross-cutting issues identified reflect the key issues sufficiently?

Fully	
Mostly	

Partially	X
Not at all	

Should you wish to expand on your response, please do so in the box below:

We welcome the inclusion of ensuring high levels of deer welfare as a key Cross-cutting issue to be addressed.

As detailed below, existing deer management activities raise a number of serious welfare issues.

It is difficult to assess thoroughly how the draft strategy would impact on deer welfare. This depends upon which strategies are implemented and to what extent. However, before new management techniques are implemented or changes are made to the current management scheme, research should be conducted specifically to assess the impact of such changes on deer welfare. Measurable indicators include individual and population fitness, fecundity rates, weight/size, longevity, survival rate, age at first reproduction, wounding rates and shooting accuracy.) These should be monitored routinely to assess how reduced numbers and increased culling rates are affecting the well-being and fitness of deer as individuals and at the population level.

Below are some issues which we believe must be addressed.

### **Competence of shooting skills**

The current situation, whereby those who wish to shoot deer only have to demonstrate that they are fit and competent in certain limited circumstances, is unacceptable. We believe all those who kill deer, both in and out of season, including sporting clients and first time shooters, must be “fit and competent”.

Fitness and competence should be demonstrated through an independent, formalised assessment process. Shooters should not be able to self-certify their fitness and competence. Such an assessment must rigorously ensure that the applicant has the shooting skill and accuracy to deliver as humane a shot as possible. The limited assessment of wounding rates caused by existing stalking activities that has been undertaken highlights a high degree of suffering caused to stalked deer. In addition, the mass-killing of deer at Glenfeshie undertaken by supposedly trained marksmen resulted in an unacceptable level of suffering.

According to the British Deer Society: “The correct placement of the bullet in the target animal is essential to minimise its suffering.” Wherever possible, a deer should be shot when it is standing broadside, and the bullet should pass through its heart and both lungs, referred to as a ‘heart/lung’ shot. Deer may also be culled humanely by shots to the neck, but these require greater skill and are discouraged unless ideal circumstances prevail or a close range ‘coup de grace’ shot is required. Although shots to the head can be instantly fatal if the brain is penetrated, non-fatal wounds involving the maxilla or mandible are possible, and such shots are actively discouraged.

Bradshaw & Bateson (2000) considered that wounding was the most important of a number of potentially serious welfare issues surrounding stalking.

They found that estimates of wounding rates by stalkers showed that 11% of deer required two or more shots to kill, 7% took 2-15 min to die, and 2% escaped wounded. Injuries observed during the study might have resulted from a number of causes, including wounding by poorly placed shots. They said: “Some of these wounds, particularly those

from head shots that shattered part of the jaw of a deer, were horrific.” Data was voluntarily provided by stalkers, all either experienced marksmen or, in the case of amateurs, accompanied by such. Bradshaw and Bateson added that wounding frequency obtained by these methods might well be an underestimate, since memories are imperfect and stalkers may not always be aware of when they have wounded an animal. In their view, stalkers did not like to admit to their mistakes, so getting reliable estimates of wounding by shooting was not always easy or accurate.

It was noted that higher wounding rates would be expected from poorer marksmen and that if shooting by inexperienced or incompetent stalkers increased, the estimate for numbers of deer that escaped wounded would have to be inflated. Bradshaw and Bateson concluded: “It follows that careful management of stalking is important for animal welfare.”

If the findings of this study were representative for all red deer shot in Scotland then of an annual total of 70,000 shot deer, at least 7,700 deer would require two or more shots to kill, over 4,900 would take 2-15 minutes to die and 1,400 would escape injured. This level of suffering is totally unacceptable. Of course thousands more deer of other species are also shot every year.

According to Urquhart & McKendrick (2003): ‘In recent years more than 75,000 wild red deer have been culled annually in Scotland. Despite the large numbers being culled there is little evidence about the number or location of the wounds created in these deer as a result of culling operations, and the need for research into shooting standards and skills has been identified by the Deer Commission for Scotland.’ They confirm that ‘The correct placement of the bullet in the target animal is essential to minimise its suffering’.

This study analysed a sample of deer carcasses considered to be a representative cross section of the red deer culled in Scotland at that time. Analysis of the wound tracts in 943 carcasses of culled wild red deer (from licensed venison dealer premises) found that up to 27% of the carcasses had more than one wound tract, averaging 14% across sampling days. This was considered likely to be an underestimate as it did not allow for tracts in the head or legs or trachea.

It is recommended that, wherever possible, shots should be taken at deer standing broadside and the bullet should pass through the heart and/or lungs. It is considered that deer can also be culled humanely with shots to the neck, although these are discouraged because of the risk that the deer may be paralysed while remaining conscious until it dies. However this study found that 15.3 per cent of culled deer carcasses with a single permanent wound tract had damage limited to cervical structures, indicating that ‘neck shots’ are commonly used.

Percentage of predominantly adult male carcasses with more than one permanent wound tract, 17.9%, was higher than the percentage of female and juveniles, 10.2%. The difference may be due to a number of factors including bodyweight. However, it was noted that another contributing factor may be that the adult males are predominantly culled by sporting tenants or by the landowners and their guests whereas most of the females and calves are culled by full-time, professional stalkers.

During the peak period of rut, there was a significant increase in the number of carcasses with more than one permanent wound tract. This is associated with a decrease from 89% to 71% in the probability of the first permanent wound tract also being the last. This could be due to the fact that increased fitness means it takes longer for serious gunshot wounds to incapacitate physically fit, highly motivated or animals in heightened state of mental arousal. Other possibilities suggested were rifle calibre, bullet specification, marksmanship and the range at which the deer were shot.

The study suggested that a significant increase in the percentage of carcasses with more than one wound tract merits review of the culling procedures by the deer manager to ensure that suffering is minimised and that this study could assist in setting minimum performance criteria for those involved in culling red deer.

Urquhart & McKendrick (2006) studied a sample of deer carcasses considered to be a representative cross-section of the red deer culled in Scotland in 2001. They found that although head shots are strongly advised against, 7.4% of carcasses examined showed head wounds, evenly divided between an elective 'head shot' by the marksman and a 'coup de grace' head shot to dispatch a previously wounded animal. They concluded that when elective 'head shots' are taken "the potential for the infliction of wounds that are not instantly fatal should not be underestimated."

We believe that all stalkers should be required to show competence of stalking ability through training and certification. Qualifications should also be renewed on a regular basis to ensure that stalkers are educated in the most current methods and techniques.

There are existing training courses and certification processes available, which are currently widely used on a voluntary basis. However if stalking is to be further promoted, qualifications and legislation would have to be clear, unambiguous, and mandatory. To assess the effect of stalking qualifications on deer welfare, a comparison should be made between qualified individuals and non-qualified individuals on shooting accuracy and wounding rates. This would demonstrate whether qualifications improve a stalker's ability to minimise suffering, and if so, this would provide support for enforcing mandatory qualifications before stalking.

We welcome the proposal by the DCS for a Register of Competence for anyone who shoots or supervises the shooting of deer. This would apply a recognised standard of competence for all people shooting or supervising shooting. The standard of competence would evolve over time as more of those shooting deer gained formal qualifications. It is not yet clear who would be eligible for a place on the register as this will be the subject of consultation with the deer sector. However there may be scope for those people with DSC DCS? Level 2 or other equivalent qualifications, or for those who qualified through some system of grandfather rights. The deer sector would need to discuss who should be given responsibility for managing the register. DCS is keen that those who shoot deer should take responsibility for protecting welfare and this was conveyed in a letter to the Minister on the Seasons consultation. However we believe that this would have to be regulated properly, with a high enough standard of competence to ensure that deer welfare is accounted for as much as possible.

If competence assessment does not become mandatory then at a very minimum there should be an obligation to be accompanied by professional or qualified individuals, to ensure that deer suffering is kept to a minimum.

### **Close seasons**

An area of concern is the situation regarding supposed close seasons. Deer are currently culled all year round by various individuals and for various reasons across Scotland.

Although a stalker is in theory not supposed to shoot deer out of season, authorisations are issued by the DCS that allow individuals to cull deer in circumstances when they would not normally have the legal right to shoot them, in order to prevent deer damaging natural habitats.

DCS authorises around a third of the deer culled during the Close Season and the other two thirds are culled by owner/occupiers who have the right to take action to prevent damage on enclosed ground without an authorisation from DCS.

There are strong moral and welfare reasons for deer of all species and both genders to have a close season. Females must have a close season in order to protect heavily pregnant animals and dependant calves. Male deer need a close season in order to have an undisturbed period to build up fat and energy reserves post-rut.

We are firmly opposed to close seasons becoming a voluntary matter at the discretion of owners and occupiers. We believe that it is essential that close seasons continues to be laid down in legislation. There has recently been growing concern about the welfare aspects of deer management and it would be a retrograde step for a factor as essential and crucial as the close seasons to be downgraded in importance by being removed from legislation and left to the discretion of owners and occupiers. Such discretion would inevitably be exercised in different ways, leading to inconsistency. Removing the close seasons from legislation would also lead to a reduction in transparency and accountability.

Close season dates should vary by species in order to respond to the differing welfare and life cycle needs of individual species.

Where it is practicable to do so in terms of administration and enforcement, seasons should vary to take account of geographical and habitat considerations.

Close seasons should be set so as to prevent the shooting of deer in the latter stages of pregnancy. We believe that a significant proportion of the public would find the shooting of deer in an advanced stage of pregnancy to be ethically unacceptable from the point of view of both the heavily pregnant female and the potential suffering of the foetus which, in a heavily pregnant animal, will be well developed.

It is extremely difficult to determine precisely at what point juveniles are no longer dependent on their mothers. In our view the mother provides a sustaining influence over and above the supply of milk. A juvenile born in June whose mother is shot in December may, without its mother, be unable to survive a harsh winter in a mountainous area. We believe that it is essential for there to be a close season for juveniles. This is partly to avoid the risk described in the consultation document of an adult female with dependent young being shot under the mistaken belief that she is a yearling with no dependent young. However, juveniles also need a close season in order to prevent the culling of very young animals. We believe that it is ethically unacceptable to cull young animals when they have known hardly any life at all. We believe that, where culling is necessary, the policy should be to cull sick, infirm, injured and old animals before any others. This has the advantage of following the natural pattern in which the diseased and old in a herd are the animals least likely to survive, rather than targeting healthy young animals which, as indicated as above, we believe to be unethical.

It is essential that there should be a close season for males. Post-rut males need ample feeding time to build up fat and energy reserves. Any disturbance to that feeding time can be detrimental to this process. The disturbance emanating from culling can be particularly unsettling for non-target males and can significantly reduce the feeding time available to them.

We firmly believe that close seasons should be based purely on welfare considerations. That said, we recognise the need to take account of damage control and cull effectiveness. However, whenever there is a conflict between these factors and welfare considerations, priority must be given to the latter.

The killing of deer during the close season in order to prevent serious damage to property should in all cases be subject to a statutory test that no other effective non-lethal means of

control is available. At present Section 5(6) of the Deer (Scotland) Act 1996 incorporates such a test, whereas the much broader Section 26(1) does not. We believe that Section 26 should be strengthened to include the test that no other non-lethal means of control is available. We believe that the Act should be amended to make it clear that the test must be applied rigorously with the onus being on the person who wishes to kill deer to demonstrate that no effective non-lethal means of control is available.

The term “serious damage” to property should be strengthened to make it clear that it only applies in the case of exceptionally serious damage.

It is essential that the exceptions are not over-used so as to become the norm. This can hopefully be prevented in the following ways:

- Clear and narrow definitions of the exceptions in the legislation.
- As indicated below, **all** killing of deer in the close season should require prior authorisation from the DCS.
- Legislation should stipulate that the DCS may only grant authorisation in exceptional circumstances and when no other means of non-lethal control is available.
- Legislation should provide that there is a presumption that authorisation should not be given for the killing of deer and that the person who wishes to kill deer has the burden of proving that (i) the circumstances are genuinely exceptional and so merit the grant of an authorisation and (ii) no other effective non-lethal means of control is available.

As indicated earlier, We believe that the current situation in which the killing of deer in the close season in certain circumstances requires DCS authorisation but in other circumstances requires no authorisation is inconsistent and unsatisfactory. In our view **all** killing of deer in the close season should require authorisation by the DCS.

We believe that a mechanism should be developed that requires notification to be made to DCS within, say, 48 hours of emergency killing. DCS will then be required to assess whether the action was reasonable, appropriate and followed the Best Practice Guidance. This would firmly place on the owner or occupier the obligation to ensure that their action was appropriate. If the action was found to be wanting, criminal proceedings should be instigated.

We understand that the existing Close Seasons will remain in place over the next five years while DCS works with the deer sector and other interested parties to develop and test new methods. Any proposed changes would be assessed through consultation with the deer sector and others to ensure that full account is taken of their expertise.

One final point is that in our view the 1996 Act should be strengthened to make it an offence not to humanely kill a wounded deer immediately after it has been wounded and certainly before shooting or attempting to shoot other deer or carrying out any other activities.

### **Non-lethal methods of controlling deer**

#### Restriction on the supplementary feeding of deer

About one third of all estate owners provide supplementary feed for deer. This is aimed mostly at stags and done for three main reasons:

- to keep deer on an estate and reduce risk that they go elsewhere and cause damage or be shot by others;
- to improve the condition of animals in terms of better antlers, body weight and reproduction;
- to reduce winter mortality.

Hunt (2003) makes a number of criticisms of supplementary feeding:

- interferes with natural feeding habits of red deer with unknown long-term effects on the species;
- debases the status of a wild animal;
- concentrates deer in a small area with risk of damage to vegetation from trampling and poaching;
- increases risk of communicating parasites and diseases;
- reduces winter mortality adding further upward pressure on red deer population when people already accept it is too high.

We believe that supplementary feeding should be limited to times and locations when it is done specifically in the welfare interests of deer. Landowners should not keep deer levels unnecessarily high in an attempt to attract high numbers of trophy stalkers. Estate owners need to be monitored in how they are managing their deer populations, and educated in the fact that increasing overall numbers of deer does not necessarily produce more stags for 'trophy' stalking. Resource limitation is a fundamental, natural aspect of keeping wild animal populations at a sustainable level and should only be interfered with when beneficial for individual animals, such as to prevent them from starving in the winter.

### **Immunocontraception**

We believe that immunocontraception of deer could provide a humane and non-lethal solution to deer over-population concerns.

Immunocontraception is non-hormonal form of contraception, based on the same principles as disease prevention through vaccination. An immunocontraceptive causes the production of antibodies against some essential element of the reproductive process, thus preventing pregnancy. There are a variety of immunocontraceptive vaccines under development including vaccines against brain reproductive hormones such as gonadotropin-releasing hormone (GnRH); pituitary hormones such as luteinizing hormone (LH) and follicle-stimulating hormones (FSH); and vaccines against steroid reproductive hormones such as oestrogen and progesterone. Thus far PZP has had the widest application to wildlife. (PNC (Pity not Cruelty) website - Project for Wildlife contraception)

Although expensive initially, immunocontraception might balance management costs in the long term, especially considering the amount of money currently being spent on government-assisted culling, fencing, damage control, etc. Considering the success of immunocontraception in US deer populations, we believe it is worth considering a trial run of a contraception programme here in Scotland. An assessment should be made of efficacy, costs and animal welfare implications and how it might be linked into the greater overall management plan. We believe that as far as deer welfare is concerned, immunocontraception has the potential to be a highly humane method of controlling population numbers.

We believe that if deer are to be shot some of the main animal welfare concerns associated with deer stalking may be partly addressed by the use of 'culling pens' and this should be further pursued and assessed on animal welfare criteria compared to other methods of killing deer.

Animal welfare representatives should be present on all Deer Management Groups.

4.5 How would you rate the priority of each set of key issues?

	High	Medium	Low
High Quality Environment			
Sustainable Economic Development			
Social Wellbeing			
Cross-Cutting	X (Animal welfare)		

4.6 Are there other issues you think should be highlighted?

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5. Ways of Working (draft strategy section 5)

5.1 To what extent do you agree with the principles set out?

Strongly agree	
Partially agree	x
Disagree	
Strongly disagree	

Should you wish to expand on your response, please do so in the box below:

We believe that ensuring high deer welfare should be a key guiding principle when any deer management is undertaken.

5.2 To what extent do you think these principles are reflected throughout the draft strategy?

Fully	
Mostly	
Partially	x
Not at all	

Should you wish to expand on your response, please do so in the box below:

We do not believe that the welfare of the deer is given appropriate priority in the draft strategy.

6. Objectives (draft strategy section 6)

6.1 To what extent do you think the objectives contributing to a high quality environment will be able to achieve the vision?

Fully	
Mostly	
Partially	x
Not at all	

Should you wish to expand on your response, please do so in the box below:

We welcome the statement that deer welfare will be considered in all management interventions. However, deer welfare must not only be considered but also given a high priority. We do not believe that deer are a resource to be exploited to the detriment of their welfare.

6.2 To what extent do you think the objectives contributing to sustainable economic development will be able to achieve the vision?

Fully	
Mostly	
Partially	x
Not at all	

Should you wish to expand on your response, please do so in the box below:

As discussed above, focus should be on alternatives to killing deer.

6.3 To what extent do you think the objectives contributing to social wellbeing will be able to achieve the vision?

Fully	
Mostly	
Partially	
Not at all	

Should you wish to expand on your response, please do so in the box below:

6.4 Overall, do the objectives cover the needs of all four species of wild deer in Scotland? If not, what other objectives are required?

6.5 Are there any objectives which you think do not apply to a particular species of wild deer in Scotland? If so, why?

6.6 Does the strategy address the future management of non-native deer species appropriately?

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6.7 Do you think the strategy addresses the interactions of deer management and climate change sufficiently?

Fully	
Mostly	
Partially	
Not at all	

Should you wish to expand on your response, please do so in the box below:

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6.8 To what extent do you think the draft strategy sets out an appropriate balance of objectives across the headings of a high quality environment, sustainable economic development and social wellbeing?

Fully	
Mostly	
Partially	
Not at all	x

Should you wish to expand on your response, please do so in the box below:

As stated above, we believe that deer welfare has not been afforded sufficient priority.
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## 7. Key Actions (draft strategy section 7)

7.1 To what extent do you think the high quality environment actions will be able to achieve the objectives?

Fully	
Mostly	
Partially	
Not at all	

Should you wish to expand on your response, please do so in the box below:

7.2 To what extent do you think the sustainable economic development actions will be able to achieve the objectives?

Fully	
Mostly	
Partially	x
Not at all	

Should you wish to expand on your response, please do so in the box below:

As stated above, emphasis should be on non-lethal ethical ecotourism as opposed to killing deer.

We are concerned that the draft strategy proposes to maintain existing markets and develop new markets for deer stalking. We oppose the killing of animals for so-called sport or entertainment purposes. We believe such a policy raises significant welfare concerns and is morally unacceptable.

The promotion of a deer stalking industry conflicts with many of the desired environmental outcomes of the draft strategy. For the estate owner in terms of private costs and benefits, the optimal red deer population would be high. Estate owners benefit from high numbers because they are interested in maximising the number of trophy stags available. Although there is scientific evidence to the contrary (Buckland *et al*, 1996), many owners believe that the stag quality and numbers are best maintained if the breeding population of hinds are kept at high levels. Shooting trophy stags is one of the more valuable hunting experiences provided by a Scottish sporting estate, and much of the estate's value is attributable to the number and quality of trophy stags that can be shot on an annual basis. Trenkel *et al* (1998) estimate the capital value of a stag to be in the region of £20-30,000, but the costs of maintaining a large and expanding deer population are borne by a much wider range of people.

Furthermore, hind stalking is not as prestigious as stag stalking hence large tips from wealthy clients are less frequent. Based on a 2000 mail questionnaire, only 19% of estate owners found hind stalking always or usually profitable, 10% found it variably profitable; while 31% of estate owners found hind stalking always or usually unprofitable, and 40% did not offer commercial stalking at all. Revenues from hind stalking ranged from £50-275 per day while costs varied from £70-135 per day (MacMillan, 2004).

Existing deer stalking raises a number of serious welfare issues which remain unresolved.

If the number of inexperienced stalkers should increase due to promotion of tourism-based stalking, the rate of wounding and injured deer and suffering is also likely to increase (Bradshaw & Bateson, 2000). Visiting tourists are unlikely to hold the relevant stalking qualifications (which are not mandatory in the first place). A Canadian tourist who went stalking in Scotland said on a Scottish Country Sports Tourism Group's recent promotional DVD (supported by VisitScotland): "It didn't seem to matter that I didn't have a great deal of shooting experience." Wounding statistics from stalking are likely to change with an increase in tourism-based stalking, and this information should be continually assessed to ensure that any changes in management are not having an adverse affect on wounding rates, suffering, and welfare in wild deer populations. Furthermore, because hind stalking is not as profitable as stag/trophy stalking, this might cause estate owners to promote high numbers of stags simply for economical reasons, thereby producing large numbers of deer which will need to be culled later on (MacMillan, 2004). Increasing tourism-based stalking also promotes Scotland as a 'hunting playground', as opposed to a place to come and observe wildlife in their natural habitat.

7.3 To what extent do you think the social wellbeing actions will be able to achieve the objectives?

Fully	
Mostly	
Partially	
Not at all	

Should you wish to expand on your response, please do so in the box below:

7.4 To what extent do you think the cross-cutting actions will be able to achieve the objectives?

Fully	
Mostly	
Partially	
Not at all	x

Should you wish to expand on your response, please do so in the box below:

We welcome the statement that the welfare of wild deer is a key part of management. The draft strategy lists specific actions:

- Agree a common understanding of deer welfare;
- Articulate the welfare responsibility associated with managing wild deer;
- Demonstrate high standards of competence in safeguarding welfare;
- Consider deer welfare in all management planning and activities affecting wild deer;
- Monitor disease risks and the effects of climate change on deer welfare.

However we would like to see the welfare of the deer given significantly increased priority.

7.5 Are other actions required? If so, what?

All proposed activities that could impact on deer welfare should be assessed. In light of the information gained, proposed activities should be amended to ensure

best practice, and, activities deemed to be detrimental to deer welfare should not be undertaken. We believe that regular ongoing independent assessments should be made of the effects on deer welfare of all management activities.

7.6 What do you think are the top priorities for action?

Use and development of non-lethal management techniques as opposed to killing deer.  
Promotion of humane and ethical ecotourism as opposed to killing.  
Compulsory competence assessment before anybody is allowed to shoot a deer.  
Assessment of impact on deer welfare of all proposed activities, and continued assessment and re-appraisal.

7.7 To what extent do you agree with the proposed indicators to monitor progress of the actions?

Strongly agree	
Partially agree	
Disagree	
Strongly disagree	x

Should you wish to expand on your response, please do so in the box below:

The proposed indicators to monitor progress regarding safeguarding the welfare of the deer are insufficient. Whilst we welcome the condition of wild deer populations and reported welfare incidents as possible indicators, these by themselves are insufficient.

7.8 Are there other indicators you think should be used to monitor progress? If so, what?

As stated above, we believe that thorough independent animal welfare impact assessments should be undertaken for any proposed activities under a new strategy. Future activities should then be amended accordingly in order to minimise deleterious effects on welfare. Ongoing independent assessment of activities on the impact on welfare should be undertaken on a regular basis.

## 8. Implementation (draft strategy section 8)

8.1 What opportunities do you identify for you/your organisation to contribute to implementing the actions in section 7?

We would be happy to consider providing comment on impact assessments and advice on how activities should be amended to ensure high welfare standards.

9. Monitoring and Review (draft strategy section 9)

9.1 To what extent do you agree with the proposed approach to monitoring the strategy?

Strongly agree	
Partially agree	x
Disagree	
Strongly disagree	

Should you wish to expand on your response, please do so in the box below:

10. Assessing the effects of implementation (Annexes 5 and 6)

10.1 To what extent do you agree the draft strategy has taken on board the potential effects on the environment identified in the Environmental Report?

Fully	
Mostly	
Partially	
Not at all	

Should you wish to expand on your response, please do so in the box below:

10.2 To what extent do you agree the draft strategy has taken on board the potential socio-economic effects identified in the Socio-Economic Report?

Fully	
Mostly	
Partially	
Not at all	

Should you wish to expand on your response, please do so in the box below:

Other Comments

Please use this space to provide any other comments you wish to make

## References

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