

Consultation on the proposed deer management strategy Response from Wildlife and Countryside Link

Introduction

- Wildlife and Countryside Link (Link) is the largest nature coalition in England, bringing together 65 organisations to use their joint voice for the protection of the natural world.
- We welcome this consultation from Defra, asking for views on their proposed deer management strategy. We note that the core motivation of the proposals is to protect woodland, a goal we welcome as a coalition working to recover nature. However, we are concerned that the proposals have come forward in a haphazard and unevidenced manner, to such an extent whereby nature recovery benefits may fail to materialise whilst unnecessary welfare harms are caused.
- We have provided responses to the questions where the expertise of our members can add relevant evidence for Defra consider. Our responses to the consultation questions include:
 - Strong disagreement that incentives for reducing deer impacts, an end to the close season for males and the deregulation of night-time shooting should be introduced in isolation.
 - A recommendation that a strategic plan, drawn from evidence and based around clear woodland protection, wider nature recovery and welfare objectives, be developed first. Only then should culling measures and incentives be considered as a last resort where non-lethal measures have been exhausted.
 - Strong support for improving standards for those involved in deer culling.
 - Strong support for the development of a National Deer Data Dashboard. We recommend that the dashboard be developed first, to inform a strategic plan and subsequent implementation measures.
- Overall, Defra's order of proposals need to be fundamentally rethought. Rather than culling measures being introduced up front and in isolation (as proposed by the consultation) evidence should first be gathered to develop an effective plan to deliver clear objectives, with culling only then taking place to reach those objectives where the desired outcomes cannot be achieved via non-lethal measures (applying the Dubois international principles for ethical wildlife control¹). This considered, evidence-led and holistic approach is required to ensure that deer management is both humane and effective for woodland protection, and for nature's wider recovery.

¹ <https://conbio.onlinelibrary.wiley.com/doi/10.1111/cobi.12896>

Response to consultation questions

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

We disagree with this proposal.

Whilst there is need to reduce deer impacts to protect woodlands, the provision of incentives to landowners without an evidenced and objective-focussed strategic plan first being in place could lead to further, unintended impacts.

The relationship between deer populations and nature's recovery is complex, and – due to a wider lack of resources for environmental monitoring – not fully understood. The differing impact of different deer species on different habitats are far from being mapped out. This is also the case for population numbers and reproductive rates across the different deer species. The granular ecological evidence needed to inform effective deer management is currently lacking. Without this evidence, reduction measures amount to a leap into the dark.

Effective deer management also requires clear objectives. In the case of deer management, woodland protection objectives need to be set in the context of wider nature recovery goals, including the apex Environment Act target to halt the decline in species abundance by 2030², and to sit alongside animal welfare objectives. Such animal welfare objectives should be founded on the recognition of animal sentience contained in the Animal Welfare (Sentience) Act 2022 and informed by advice from the Animal Sentience Committee established by the Act.³

Without relation to clear objectives, the incentivised killing of deer could continue for an unspecified period of time because there will be no criteria for the culling to be considered a success (and therefore to be stopped). This could result in far more deer being culled than required.

Defra have failed to put forward a strategic plan for deer management, drawn from detailed evidence and based around clear objectives. In the absence of such an underpinning plan, incentives to reduce deer impacts constitute putting the cart before the horse.

Once an evidenced, objective-focussed plan is in place, incentives may place a useful role in delivering the plan on the ground. However, if divorced from an overarching strategy, as proposed in the consultation, isolated incentives are likely to lead to unpredictable consequences, which could have detrimental impacts on nature's recovery and animal welfare.

² <https://www.legislation.gov.uk/ukpga/2021/30/section/3/enacted>

³ <https://bills.parliament.uk/bills/2867>

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?

We strongly disagree with this proposal.

The policy would lead to the killing of thousands of male deer, who would not otherwise be killed. This is a clear negative welfare impact. There is insufficient evidence that ending the close season for males would deliver the desired overall reduction in deer population.

Most deer populations are already predominantly female, with only a small number of males required to keep reproduction numbers high. Data from the Red Deer Research Group suggests that 80% of red calves born on the Island of Rum are fathered by about 20% of the stags.⁴ It is notable the muntjac deer have never had a close season in the UK, despite this the population has grown since the 1980s.⁵ As long as some males are present in deer populations, those populations have the potential to continue to grow.

This reality is recognised by organisations with a hunting rather than a welfare focus. In the words of the British Association for Shooting and Conservation (when responding to similar proposals in Scotland):

*"It is widely thought that abolishing the male close season would do little to effectively reduce the overall size of Scotland's deer population because such a provision would not reduce the reproductive capacity of any given deer herd."*⁶

In addition to thousands of unnecessary deaths, the end of the male close season could lead to orphaning impacts for young deer. Amateur sportsman may struggle to recognise the difference between male and female deer at certain times of year, especially with young deer and species like chinese water deer. The end of the male close season could lead to females being accidentally killed and their fawns orphaned and left to starve.

It is concerning to see such culling measures, resulting in negative welfare impacts without necessarily delivering ecological benefits, presented by the consultation as the key means of reducing deer impacts to protect woodlands. There is more to deer management, or indeed any humane and effective wildlife management, than culling and this needs to be the starting point of a holistic ethical strategy to manage deer impacts and numbers.

Non-culling forms of deer management include:

- Introducing fertility control in deer, through injection and ingestion. Some products have been shown to be very effective at preventing breeding in deer in the USA⁷, sometimes with one dose

⁴ <https://www.wildlifeonline.me.uk/animals/article/red-deer-breeding-biology>

⁵ <https://ptes.org/get-informed/facts-figures/reeves-chinese-muntjac/#:~:text=Population%20size%20%26%20distribution,They%20are%20absent%20from%20Ireland.>

⁶ <https://rifleshootermagazine.co.uk/article/an-open-letter-to-the-scottish-animal-welfare-commission>

⁷ <https://blog.humanesociety.org/2017/07/epa-gives-thumbs-vaccine-manage-deer-populations-humanely.html>

being effective for some years without affecting behaviour or compromising the value of deer meat. Further research into how these products could be effectively deployed in the UK could prove fruitful.

- Reintroducing native species, such as lynx, in appropriate locations to control the number of deer. The reintroduction of lynx would also deliver local ecotourism benefits and restore key ecosystem services. It is important however that all species reintroductions are evidence-based, considered within the context of the entire ecosystem and follow appropriate guidelines.
- Using thorny scrub habitat to protect young native trees from grazing activity. This also serves to grow an important woodland habitat in its own right.

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?

We disagree with this proposal.

A range of studies suggest that 7-19% of shots hit deer in the legs and abdomen, causing significant pain, with 82% of deer requiring a second shot in order to be killed.⁸ This inaccuracy is greater at night, when terrain and distances may be misjudged, leading to higher wounding rates and consequent animal welfare issues. A high level of expertise and equipment is required to shoot at night without causing undue distress to the deer targeted. Most shooters will not have this level of expertise and equipment.

Recent improvements in technology for night-sights are unlikely to make a significant difference. Data from night-time shooting carried out as part of the badger cull in England show relatively high miss rates, suggesting that even with the new night-sights, night-time shooting is inherently inaccurate.⁹

This measure may also lead to female deer being killed during their close season. Telling the sex of a deer in the dark is particularly difficult, and females are likely to be mistaken for males, leading to orphaning of fawns.

There are also concerns that permitting widespread night shooting will make poaching virtually undetectable. Any poachers caught in the act will be able to claim that they are taking part in legitimate culling activities.

⁸ <https://www.gov.scot/binaries/content/documents/govscot/publications/advice-and-guidance/2021/01/management-of-wild-deer-scottish-animal-welfare-commission-response/documents/management-of-wild-deer-scottish-animal-welfare-commission-response/management-of-wild-deer-scottish-animal-welfare-commission-response/govscot%3Adocument/SAWC%2BResponse%2Bto%2Bthe%2BReport%2Bof%2Bthe%2BDeer%2BWorking%2BGroup%2B-%2BJanuary%2B2021.pdf> p6

⁹ <https://www.gov.uk/government/publications/bovine-tb-summary-of-badger-control-monitoring-during-2021/summary-of-2021-badger-control-operations#accuracy-of-controlled-shooting>

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

We strongly agree with this proposal.

All people culling deer should be required first to attain to hold Deer Stalking Certificates 1 & 2, to ensure they have the expertise needed to avoid causing undue distress to the culled animal.

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

We strongly agree with this proposal.

As set out above, the evidence base for deer populations in the UK is currently limited. The extent of this uncertainty is illustrated by the fact that whilst the consultation document suggests an overall population of 2 million across six species, the Mammal Society estimates that number to be around 1.1 million.¹⁰

Further evidence is needed to address these discrepancies before further action, especially any decisions to cull, need to be based on accurate population data, including inter-species data.

The National Deer Data Dashboard should allow a fuller understanding of deer populations and their effects on woodland, and nature's recovery more widely. This data needs to be detailed enough to allow for a full assessment of the differing impacts of different species, to inform varying approaches tailored to address the specific impacts of each. It should also inform welfare considerations, by allowing analysis of the impacts of different shots on the humanness of a deer's death. It should also allow conclusions to be reached as to whether deer management objectives are being reached.

The National Deer Dashboard should be developed first, so that it can then inform a holistic strategy plan for deer management (following the Dubois principles for ethical wildlife control), based around clear woodland protection, nature recovery and welfare objectives. Only then should the culling measures proposed by this consultation be considered, when non-lethal measures have been exhausted.

This response is supported by the following Link members:

Humane Society International – UK

Born Free

National Trust

RSPCA

FOUR PAWS UK

¹⁰ <https://www.mammal.org.uk/wp-content/uploads/2021/06/MAMMALS-Technical-Summary-FINALNE-Verision-FM3290621.pdf>

League Against Cruel Sports

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