



The Scottish Gamekeepers Association was formed in 1997 by a dedicated group of gamekeepers to promote the positive side of game conservation, to educate politicians, the media and the education authorities of the benefits of good game management.

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Introduction

The Nature of Scotland Policy Document (NSPD) states, *“The proposals in this policy statement will make a real difference to Scotland’s people’s ability to manage and protect Scotland’s natural heritage”*

Many of the proposals contained in The Nature of Scotland, a Policy Statement, have a direct bearing on the work of gamekeepers.

“We are committed to the continuing development of policies which work for Scotland’s biodiversity as well as the people and communities whom our natural heritage supports” (NSPD)

We feel deeply and passionately about the wildlife and the countryside we manage and about the rural communities in which we choose to live; it is time that proposed legislation takes account of the part we play in looking after your heritage and of the dependence of rural communities on our skills.

The assumption, made in the Nature of Scotland document, that all wildlife should be allowed to flourish in uncontrolled numbers, regardless of the social and economic requirements of the rural communities most affected, is a cause of deep concern to us. True conservation requires a balance of all species; as man is involved, his role and well being must also be considered.

The Scottish Gamekeepers Association, as an integral part of conservation, is pleased to respond to your document.



Chapter 1 – Working together across the country.

“We want to see a countryside in which biodiversity thrives alongside the economic and recreational activities which sustain our rural communities” – (NSPD)

Biodiversity, the rural economy and recreational activities are inextricably linked but this is not acknowledged in the document.

The Foot & Mouth outbreak has caused soaring numbers of tourist-booking cancellations, not only in agricultural areas but throughout Scotland; losses to the UK's rural economy are running at an estimated £100 million a week, highlighting the fragility of rural life.

The habitats managed by gamekeepers support and sustain biodiversity, which in turn attract tourism and associated recreational activities to fuel the rural economy.

Case Study Example: Eaglescairn Mains - No mention is made of effective forest protection requirements or pest control costs and objectives.

The long-term establishment of woodlands will require protection from deer, rabbit, hare, and grey squirrel. Wetlands will require mink management whilst crows, foxes and magpies will prevent the establishment of wildlife that will be initially attracted to the developing habitats. Failure to deploy positive wildlife management will detrimentally affect the long-term aims of this project.

Scottish Forestry Strategy: An authority whose directive was to plant fast growing conifers, created much of the environmentally unfriendly forest habitat dominating our uplands. Biodiversity and long-term wildlife management were not considered. Consequently, we have created habitats beneficial mostly to populations of pest species that threaten any conservation project requiring the re-establishment of species of flora and fauna; the pressure from predation ensures that the eggs and young of the species are destroyed. Grouse-moor and upland farms suffer a similar fate.

Paradoxically, the *earlier* forestry policies have resulted in extensive numbers of woodland deer threatening the *new* forestry objectives, which are to protect our forestry and woodland, expand the forest area, enhance the economic value of our forest resources and to conserve and enhance the biodiversity, landscape and cultural heritage of forestry and woodland.



A new grant system to financially support forestry ownership and effective forest protection will be essential to successful habitat creation, as will the employment of informed wildlife staff to protect and nurture the flora and fauna.

The Nature of Scotland does not acknowledge or appear to recognise these facts; facts well understood by those who have spent a lifetime working with trees and wildlife conservation.



Enjoying the countryside: The document makes mention of the income derived from mountaineering and hill walking but makes no mention of the income and jobs generated by country sports; again this essential part of rural Scotland's way of life is ignored by the Government.

The continual lack of acknowledgement, from those elected to govern, to the financial and ecological benefits of countryside sports is consistent with the apparently increasing need to promote protectionism at all costs. Protectionism does not promote sustainable biodiversity or rural sustainability.

SGA Case Study: Scotland's Red Deer Population

The SGA's professional stalker members and the deer stalking fraternity are concerned about the future of deer forests and those whose livelihood depends on them. The Nature of Scotland document does nothing to alleviate those concerns.

With the decline of the Atlantic salmon, the disasters in hill farming and the importing of cheap timber, many Highland estates rely on deer stalking as their main source of income. The large numbers of deer now being shot out of season in forestry and on the open hill is the result of failed deer management policy over the past 40 years.

We are also concerned that the Deer Commission for Scotland (DCS) appears to have recently become more influenced by the RSPB and SNH, neither of which has experience in deer management, at the expense of their own field staff and the professional stalker.



Deer forest managers are not in complete control of their environment. Severe winters, the slaughter on forestry land and areas of natural re-generation where it is proposed that deer fencing is removed, are all outwith his control. The DCS policy for the slaughter of deer in areas where traffic accidents occur and damage in areas of unfenced re-generation, will lead to more deer being killed. This will lead to the loss of employment exacerbated by the inevitable resulting drop in estate income.

Hinds heavy in calf and dependant mothers are being slaughtered in large numbers out of season in forestry and on the open hill. The deer damage, taking place in forests throughout the countryside, is a result of 40 years of negative wildlife management policies. The use of contract killers will do nothing to address this situation. They have no interest in effective crop protection or deer welfare and are paid on the number of carcasses, which is an incentive to shoot in open land rather than within the trees. The resultant stress, wounding and disturbance will result in escalating forest damage. By encouraging estates to regenerate trees in deer forests, SNH are adding to Scotland's deer problem.

The RSPB insist that deer fencing is, in part, to blame for the decline in capercaillie. At their Abernethy Reserve, they have taken down 25 miles of deer fencing, removed the sheep from the hill **and** reduced deer numbers by two thirds, but still their capercaillie numbers have declined. As we state in our case study of the capercaillie (P.13), old style deer fencing - which allows birds to fly through the wire - should replace the newer meshed fencing.

Under the Deer (Scotland) 1959 Act 1959, DCS was responsible for the conservation and control of red and sika deer. Its functions now include the

“sustainable management of deer” and keeping under review all matters relating to deer including their welfare. The proposed density of less than 5 deer per 100 hectare will make these forests unsustainable. The SGA are concerned that the DCS is doing nothing to stop SNH’s disastrous policy.

The current outbreak of Foot & Mouth disease highlights the critical flaws in growing trees without fence protection. A declaratory order enforced on 3rd March and lasting between 3 & 4 weeks, banned the shooting of deer. How do those in favour of growing trees without fences propose to protect the taxpayers’ investment when enormous amounts of damage can be done in a very short space of time?

Despite increased culls, DCS maintain deer numbers are rising. We disagree and would welcome any ideas for an independent deer count.

We recommend that the DCS and those with an interest in forestry take the following action:

- 1 End the planting and fencing-off of valuable deer wintering grounds resulting in the reduction of the deer range.
- 2 Stop the regeneration of trees without fencing in deer forests and neighbouring areas.
- 3 Take an active part in the design of woodlands for the benefit of deer and trees.



Those with a genuine understanding and interest in deer welfare, question the DCS support for killing mothers with dependent calves and out-of-season shooting in general.

Deer stalking is one of Scotland’s greatest assets, upon which many highland estates and fragile rural communities depend for a source of income. Sporting clients from all over the world visit our beautiful country to stalk deer in the wild and remote corries in the Scottish glens. This can only continue if those in authority have practical experience of deer management, both in woodlands and on the open hill.

Deer are part of Scotland's natural heritage so too are the people who live and work in the remote highland glens. Whether they remain so, only time will tell.

Chapter 2 - Water Framework

Predators such as mink, seals and cormorants are a threat to waterways from the top of the hill to the seaside. Predation control is an essential part of any long-term recovery plan.



Chapter 4 – Working together for special places:

Stalkers and keepers on sporting estates manage 50% of all SSSIs; why were the SGA not fully consulted?

“National Parks, which are provided for in the National Parks (Scotland) Act 2000 will provide for integrated decision-making about the management of large areas where the interests of nature, landscape, recreation and socio-economic priorities raise particularly complex issues. National Parks are likely to include a range of areas which are already SSSIs or Natura 2000 sites.” – The Nature of Scotland

Orthilia secunda - Serrated Wintergreen (scarce)



High density of flower heads - a benefit of heather burning by gamekeepers

The Scottish Executive's National Parks Bill aims "To promote sustainable use of the natural resources of the area" and "To conserve and enhance the natural and cultural heritage of the area".

The Scottish Executive says it has no 'view' on Lord Watson's Protection of Wild Mammals (Scotland) Bill. We urge you to re-consider that position.

Grouse-shooting underpins the rich and varied biodiversity of the Cairngorms and yet Watson's Bill would remove an important tool in maintaining our endangered heather habitat: the use of terriers to flush foxes from underground. Gamekeepers are employed to provide shooting. Shooting is a huge countryside industry. It relies on a healthy countryside, which supports an abundance of wildlife including game birds and they in turn, benefit from gamekeepers managing their habitats, providing their food and controlling their predators.

The Borders too, are a 'Special Place', renowned throughout the world for their beauty. The countryside has been hunted for hundreds of years. If hunting is banned, the incentive to manage the countryside as it is today will be lost and so too will the biodiversity it shelters. The Scottish Gamekeepers Association urges the Scottish Executive to take the view that the Protection of Wild Mammals (Scotland) Bill is contrary not only to the National Parks Bill, as it will clearly undermine the aims of a Park, but also to the sentiment of The Nature of Scotland document.

Thousands of tourists admire the abundance of our flora and fauna - Scotland has one of the richest examples of biodiversity in Europe. If grouse numbers fall because of inadequate predation control, the grouse shooter will find his sport elsewhere. It follows therefore that without the grouse shooter, there will be little incentive for estates to manage the heather mosaic and consequently either the taxpayer will have to foot the bill or it will fall into decline, thus losing our uniquely Scottish biodiversity.



Case Study Example: Corncrake SPA Management Scheme

Effective protection of the corncrake involving active predation control, is taking place on the islands of Coll, Tiree and Colonsay - why is this not mentioned in The Nature of Scotland document?

SGA Case Study: Langholm Moor



Langholm Moor

You will not hear anything about the human beings who have lost their jobs, the small birds & grouse that have gone and the countryside that has been denuded - in the name of conservation

Ten years ago, the Buccleuch Estates agreed to a remarkable experiment in conservation on their finest grouse moor. They proposed to resolve the age-old argument about whether birds of prey and the grouse they hunted could survive together if there was no interference from human beings.

For years the Royal Society for the Protection of Birds (RSPB) had accused the owners of sporting estates of killing rare birds of prey, scaring them off, or destroying their nests, in direct contravention of the law, in order to preserve the grouse that provided their sport - and sometimes their livelihood.

If only nature were allowed to take her course, said the RSPB, a healthy balance could be maintained.

The landowners, in turn, said that would be disastrous. While one or two pairs of peregrine falcon or hen harriers were manageable, unimpeded breeding would simply lead to grouse being wiped out, the end of their sporting business, and the loss of all the local jobs that depended on it. The argument went back and forward, but it was a sterile one, because both sides had only prejudice to go on.

Then, in 1992, the owner proposed that the RSPB's theory should finally be put to the test. He would instruct the five gamekeepers on his 12,000-acre Langholm Moor estate in the Scottish Borders to protect the birds of prey, or raptors as they are known, from egg-collectors, or anybody seeking to control their numbers, for five years. The experiment would be monitored by the RSPB, SNH and by other conservation bodies, so that it was fairly conducted. At the end of the five-year period, they would take stock, and see what had happened. All the parties involved agreed to accept the results.

By 1997, there was little doubt about the outcome. The number of hen harriers had increased from two to 28 breeding females, the peregrine from two to seven pairs. The grouse had fared less well. They had been virtually wiped out. What had once been one of the most successful moors in Britain had ceased to be viable as a commercial proposition.

Given the terms of the experiment, the RSPB should, at this point, have accepted the conclusions and got together to find means of reducing the harrier numbers. Various approaches were suggested, such as scaring off the harriers at nesting time. The most realistic, from the Game Conservancy Board, was an extensive programme of relocation - moving the harrier and peregrine to areas where there were none at present, so that they could continue their breeding.

Instead of this, however, the RSPB simply moved the goalposts. The decline of grouse, they said, had nothing to do with the raptors. It was due to the poor state of the moor, the lack of heather cover, and the way the earl's sheep had grazed the hills over the years. If only sheep were removed, and heather allowed to grow, the grouse would find somewhere to hide.

Not surprisingly, the owner protested. None of this had been raised at the outset, and grouse had always flourished alongside the sheep in this supposedly poor habitat. Who was to pay for the moor now? With no grouse to shoot, and therefore no income, he would have to lay off his keepers. Surely, the point of the experiment had been to find a solution, not to destroy the only local source of employment.

The conservationists then came up with their own solution. It had a sort of mad logic to it. If only the harriers - the real killers of the moor - could be persuaded to eat something else, perhaps they would give the grouse a chance. Thus, it has transpired that every day a supply of dead rats (white ones are favoured) is put out on the moor to provide the harriers with a ready-made larder. The rats are shipped up from England, no expense spared. The harriers are delighted. Instead of having to cruise the hills in search of elusive grouse, they are given their feed, almost literally on a plate.

Despite the alternative-feeding programme running for 2 seasons following the experiment, in 2000, hen harrier nests were down to 7 as the natural food supply (grouse, meadow pipits, skylarks etc) dried up. Because of the lack of keepers, foxes predated 2 of the harriers' nests and only 5 nests were successful.

What of the grouse? They have not thrived. Their numbers remain so low that shooting has had to be suspended. The five keepers have been reduced to one part time. Net result: raptors 20, grouse nil, keepers nil, landowner distraught.

Everybody knows it is lunatic, but the RSPB cannot publicly admit it. The society is, of course, a prisoner of its members who would never agree to interfere with these magnificent hunters of the skies. Nature must be allowed to take its course, goes the argument, even if that means sacrificing large numbers of rats (who nobody minds about) and the grouse, which come lower down the pecking order.

To suggest that feeding dead rats to wild hen harriers is restoring nature's balance is not just dotty - it is offensive. The habitat is entirely unnatural in the first place, and has been for centuries. Man has cut down the trees, introduced sheep and cattle, allowed the heather to grow by burning it in rotation. The scenery so cherished by ramblers and tourists alike - rolling purple hills, rocks and golden bracken - is in fact preserved by gamekeepers, who know how to maintain the balance of wildlife in the countryside and who are able to sustain biodiversity and employment in rural areas by creating a shootable surplus and farming that crop carefully. Take away one element - the grouse - and all that is at risk.

Try arguing that with the RSPB however and they will talk about poor habitat and overgrazing. What you will not hear is anything about the human beings who have lost their jobs, the small birds and grouse that have gone, and the countryside that has been denuded - all in the name of so called "Conservation".

SGA Case Study: Endangered Birds and The Heather Habitat

Declining waders such as golden plovers, curlew and lapwing are up to five times more common as breeding birds on grouse moors than on equivalent moors not managed for grouse, a scientific paper by the Game Conservancy Trust and the RSPB reveals.

A scientific paper published in leading international scientific publication *The Journal of Applied Ecology* (April 2001) reveals that management done by moorland gamekeepers, including predator control (foxes, stoats and crows) and rotational strip burning of heather, to favour red grouse habitats are keys to the waders' success.



"The effect of management for sport shooting of red grouse on the density of breeding birds on heather dominated uplands" - Andy Tharme (RSPB) and Dave Baines (The Game Conservancy Trust), Rhys Green (RSPB) and Ian Bainbridge (formerly of the RSPB - reveals that management of grouse moors has major benefits to other birds using this fragile and unique environment. Golden plovers and lapwings are five times more abundant on grouse moors compared with other non-sporting moors and curlews are twice as common. Gamekeepers managing grouse moors reduced carrion crows, a common predator of bird eggs, by three fold.

Dr Dave Baines of The Game Conservancy Trust said: *"Here we have strong evidence that gamekeeping on grouse moors greatly helps other ground nesting birds. **Birds such as waders do much better on grouse moors where they are given protection from predators and better habitat by gamekeepers.**"*

He added: *"It also costs the tax payer little as grouse management is privately funded. The government has proposed that wild birds should be indicators of sustainable agriculture. **Grouse management is clearly a sustainable land use which helps biodiversity enormously.**"*

Simon Bostock of the Moorland Association said: *"This scientific report endorses that moorland management for grouse shooting also benefits golden plover, curlew and lapwing which are in danger of rapid decline if not protected. They are on the RPSB's Amber List of bird populations. The Government has proposed that wild birds should be indicators of sustainable land use and the keeping of heather moorland for grouse*

shooting, which is privately funded, is seen in this report to sustain a great wealth of biodiversity."

The red grouse, which eats predominantly heather shoots, is only found in the UK and Ireland. Grouse shooting has provided an incentive to manage and care for heather moorland, which is recognised as a habitat of international importance.

Without grouse shooting much of the UK's heather would have been lost. Aerial photographs have shown that since the 1940s heather loss has been 17% on Scottish grouse moors but there has been a reduction of up to 50% on moors where there has never been shooting or where sport has stopped. In England and Wales over the past 15 years, however, due to the efforts of the Moorland Association and with help from agri-environment schemes, 160,000 acres of heather have been successfully regenerated with many more in the pipeline.



**Grouse management is clearly a sustainable land use,
which helps biodiversity enormously**

Grouse moors are deemed to be so valuable for other forms of wildlife that the Westminster Parliament's recent Countryside and Rights of Way Act will allow owners to ban dogs from grouse moors. Landowners can also consult with English Nature in a bid to have access to walkers restricted if conservation is threatened. We would like to know the Scottish Executive's position and urge them to seriously consider the implications of their proposed legislation and of the Protection of Wild Mammals (Scotland) Bill on the conservation work carried out daily by Scotland's gamekeepers.

Chapter 5 – Working together for wildlife

The Nature of Scotland document advocates jail sentences for wildlife crime but fails to address the causes of the crimes. Professional bodies and the public should have the right to protect their stock from attack and slaughter, particularly by protected mammals and birds that are neither rare nor endangered. A licensing system would enable legitimate predation control to promote biodiversity and would penalise those not permitted to carry out these controls.

Many of the birds under protection are neither rare nor endangered. Some species of raptors are at saturation level while other species such as cormorants, ravens, badgers and pine martens are damaging wildlife and game stocks in many localised areas. The document fails to address this damage and it appears that personal consideration by the police and conservation bodies takes precedent over the property and livelihoods of citizens.

Garden bird-tables: A sitting target



**The pine marten preys on red squirrels
but there is no mention of the balance
required between Predator and Prey, if
the latter is to have a chance of
survival...**

The SGA is concerned that the Scottish Executive may have been misinformed. We recommend that a committee be formed, consisting of people with a minimum of 20 years full-time employment in practical land management (not information gathering from office bound staff or by academics). This will enable the committee to give practicable and factual advice. The Scottish Executive will then be able to put forward realistic proposals to address rural problems and safeguard our heritage.

SGA Case Study: Capercaillie

Wrapped up in the Nature of Scotland document is the status of capercaillie protection, the plight of which intrigues us.

Capercaillie & Brown Hares are Threatened Species. Action Plans have been produced for their survival. In both cases, one of the factors in their decline is increased fox predation ("Biodiversity of the Cairngorms - An Assessment of Priority Habitats and Species" p62 - Brown Hare and p76 - Capercaillie refers.)

Following the loss of the capercaillie in the mini ice age and deforestation in the 18th Century, capercaillie were re-introduced by landowners in the 1830s and flourished until the 1960s/70s when a massive increase in the fox population occurred. Between 1830 and 1960, deer fences were common, deep ditching took place and, most importantly, extensive predation control was undertaken.



Removing the capercaillie from the quarry list will not protect it from predation...

... Nor stop it from crashing into meshed deer fencing

Loss of habitat and deer fencing are not wholly responsible for the decline in capercaillie. Many areas still have suitable habitat but no capercaillie. Old style deer fencing, while more expensive, allowed birds to fly between the wires. The modern – cheaper - fence has meshed wire through which only a smaller bird could fly. One of our Management Committee members has 17 years experience of managing capercaillie and 45 years managing black grouse. His experience, backed up by that of other committee members, has shown that deer fencing kills 1% of the population; predation and disturbance kills 80%.

Pre-1960, forestry interests classed capercaillie as pests and they were shot as such; their numbers, however, remained sustainable. Only when the fox population exploded in the 1970s, did capercaillie numbers reduce to today's levels.

Experiments carried out by the RSPB at Abernethy go a long way to proving this point.

Consultation was taken by the Scottish Executive to ascertain the best way forward to protect this magnificent bird, of which it estimated that less than 1,000 remain in Scotland.

Despite this consultation, advice from shooting and countryside bodies and the Biodiversity Action Plan working group that the capercaillie be placed on Schedule 1 Part 2 of the Wildlife and Countryside Act, has been ignored in the Nature of Scotland document which proposes the bird is placed on Schedule 1 Part 1...

Annexe B, 10 of the policy document states *"Because of its decline in recent years a voluntary ban on shooting has been in place on Forestry Commission and privately owned land since 1990"*

The Executive recognises that for over 10 years, landowners and gamekeepers have protected the capercaillie by imposing a voluntary ban on shooting it but does not appreciate that because of this interest, the ban has worked extremely well and the shooting community has been encouraged to secure the bird's future. We have ensured that in the few areas where this bird survives, the predation by stoats, mink, foxes and crows has been controlled.

The Executive continues: *"While the ban has been generally effective, the parlous state of the species in Scotland means that greater legal protection is now required."*

Allowing it to remain on the quarry list will maintain the interest required to save this bird. Furthermore, if the capercaillie is managed as we recommend, as numbers increase it will become necessary to selectively shoot the old cocks in order to improve fertility. No scientific evidence has been made publicly available to suggest that removing it from the quarry list will address the problems facing the birds' survival or the problems of 'intentional disturbance'.

Disappointingly, the Executive has decided to listen to conservation and protectionist bodies such as the RSPB who showed scant concern for this bird when they ceased all predation control at their Abernethy Reserve, a stronghold for capercaillie.

By 1991, capercaillie numbers at Abernethy had plummeted; the subsequent re-introduction of predation control of foxes and crows led to a considerable increase in numbers during 1992–6.

In 1995, Dr Robert Moss of the Institute of Terrestrial Ecology reported: "Capercaillie brood counts at Abernethy began in 1989 when there was no predation control on the estate. By 1991, the continued poor breeding and declining densities of the capercaillie at Abernethy were enough to indicate that predators were having a serious impact on numbers there." Despite this evidence, the RSPB instigated a further "experiment" and again ceased predation controls in 1997. In 2000, following a further crash in numbers of the already endangered species, the RSPB reluctantly reversed their decision and re-imposed limited controls. A scientific experiment conducted by the Game Conservancy Trust between 1984 and 1990 on Salisbury Plain in Wiltshire, demonstrated that predation control enabled birds such as grey partridge to increase their breeding

stock by 2.6 times (260%) and autumn stock by 3.5 times. This shows that predation control can be an important part of conservation in the UK.

"Foxes and other mammal predators are known to have severe impacts on colonies of ground nesting species"
SNH

Foxes have a wide and varied diet, which includes the eggs and young of ground nesting birds.



Fox predation - 14th April 2001

If our advice is not taken, we predict predators will exterminate capercaillie within 10 years; and further reduce numbers of black grouse, ptarmigan, partridge and dotterel (to name but a few) over the next few decades.

The document states, *“SNH is our key public sector partner”*. The SGA have reservations about SNH's perspective on conservation. SNH are not specifically a scientific body, nor do they have practical knowledge on the ground. They appear to listen and act on opinions from organisations with a protectionist agenda and seem incapable of balancing wildlife with the livelihoods of communities; geese, cormorants, raptors, ravens and some mammals (regardless of population densities) are given precedence over human needs.

The Scottish Wildlife Trust was another body consulted by the Scottish Executive during the draft stage of the Nature of Scotland document. This group publicly encouraged farmers to throw the carcasses of farm animals into open pits in a bid to encourage eagles, ravens and anything else attracted by rotting flesh. There was no consideration to the risks of spreading disease in their advice or to the fact this was unlawful.

We question some of the professional decisions made by these organisations. They purport to be the embodiment of expertise yet have proved they have little idea of the consequences of some of their actions. The Government, however, accepts their advice without question. We have given advice on predation controls and yet this document does not address the need for extensive predation control to protect capercaillie.

We suggest that predation control guidelines be drawn up in consultation with the SGA (representing Scotland's Wildlife Managers) and given to Land and Reserve owners with an interest in creatures of all descriptions.

Proposals for the jailing of persons convicted of wildlife crime have also been covered in this document. We were not consulted about these proposals and yet we will be affected if they become law. Whilst we agree that persistent egg stealing should be dealt with severely, we cannot agree that people should be jailed for defending their stock and their livelihood.

We recommend research be funded by the Scottish Executive into the reasons for some wildlife crime, such as the killing of birds of prey and protected mammals.



Game-managers and farmers do not kill wildlife for fun. If eagles or ravens attack lambs, there is no legal redress; in some cases, this frustration has unfortunately led to some individuals taking the law into their own hands.

It is possible that when trying to eliminate a problem with ravens (whose population has increased by 40%), eagles and other less numerous species of raptors have been involved. We do not condone such actions but feel that had there been legal methods of solving this problem, these incidents may not have occurred.

We believe that research will substantiate our opinion and should allow for constructive legislation permitting licensed control for protection of private stock.

Good News Case Study (Education): Effective pest control is vital to conservation of our biodiversity, why is this not taught in schools? The Wildlife manager – as the gamekeeper has increasingly become - is the frontline in conservation; another fact ignored by this document.

Conclusion:

The Nature of Scotland document states: *“Our natural heritage is in many cases the fruit of many centuries of human stewardship, we want to support and reward that continuing wise stewardship”*.

The document continues: *“To propose a new duty for Scottish Ministers to have regard to the conservation of biodiversity, the richness and variety of our species and habitats”*.

To ensure this sentiment is not lost to rhetoric, the Scottish Executive will undoubtedly find it helpful to seriously consider the advice and expertise of those who work with Scotland’s nature on a daily basis. Furthermore, if the “Duty” is to be fulfilled, recognition must be given to the value of the shooting industry’s contribution to conservation work. The continual hype surrounding mistakes made 100 years ago is unconstructive, does nothing to safeguard our heritage, and should be taken out of today’s equation.

*Zygaena exulans (Mountain Burnet Moth) on
Astragalus alpinus (Alpine Milk-Vetch)*



Both rare, both protected by balanced estate management.

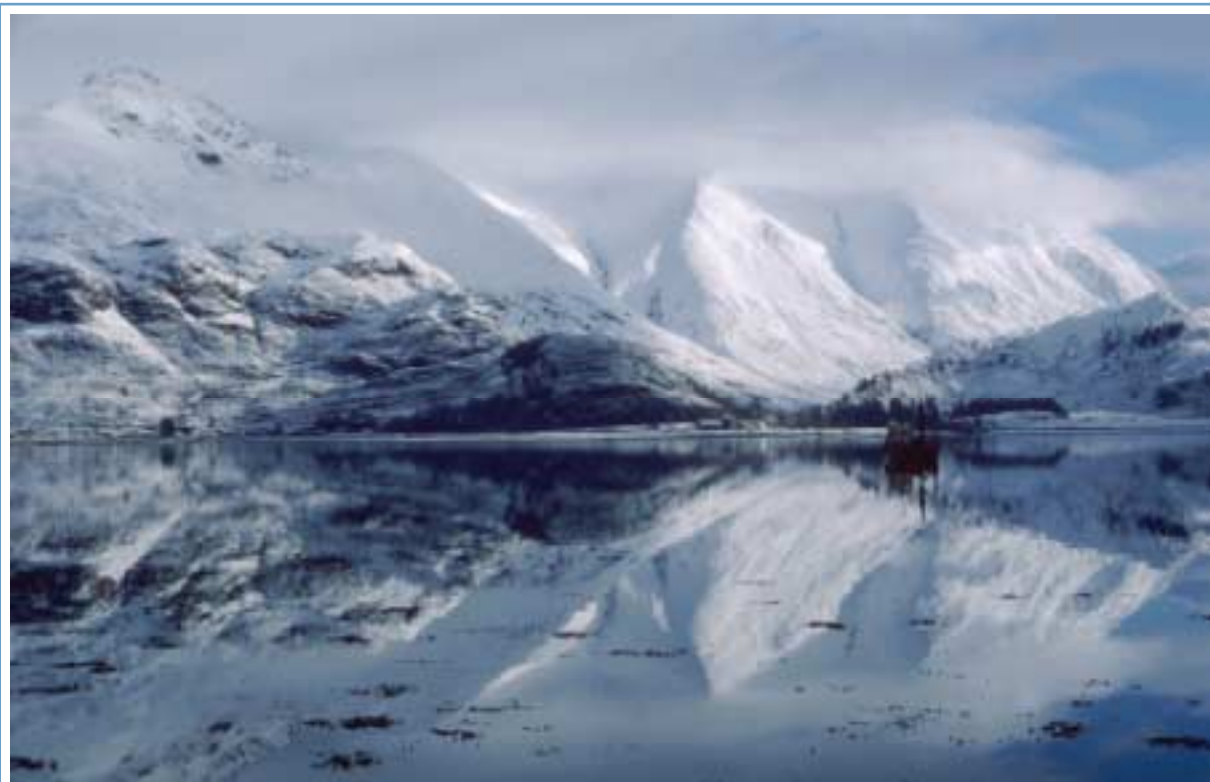
The Scottish Executive apparently does not recognise that its vision of Scotland’s nature does not need creating; it already exists.

A vibrant and biologically diverse countryside is already flourishing under the stewardship and management of the gamekeepers. Many of the policies so detrimental to our countryside were instigated by government and implemented by

farming forestry interests. The shooting industry's views on whether these decisions were likely to benefit conservation were sadly not sought.

Enhancement of our countryside would benefit all, but many of the proposals in the Nature of Scotland document will support the *deterioration* of our unique biodiversity and of our rural communities.

The SGA submits that many of the views expressed in the Nature of Scotland policy document are protectionist and will not sustain or enhance the Nature of Scotland.



"We are indeed a country with a past. The past has shaped us, but our task now is to shape the future. I hope that we can all co-operate to do that."

Donald Dewar

The Scottish Gamekeepers Association urges the Scottish Executive, and the Deputy Minister for Rural Development in particular, to meet and discuss the proposals with us at the earliest opportunity and to heed our expertise before it is too late.