

'Changes to Game Licensing and Game Management

Response of the Deer Initiative

Respondent details:

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Background

The Deer Initiative (DI) is a wide partnership of statutory, non-statutory, voluntary and private interests. Whilst originally set up by the Forestry Commission and still, in the main, funded by the Forestry Commission and English Nature, it has a core staff whose activities are both to co-ordinate the relevant activities of the partners and to deliver some functions directly.

The aim of the DI is *"to ensure the delivery of a sustainable, well managed wild deer population in England and Wales"*. The staff and finances of the DI are managed through the DI Ltd, a charitable company limited by guarantee, dedicated to supporting the DI.

Our remit is restricted to the management of wild deer and this response focuses on the issues that affect this role. Some of our Partners have wider interests and will undoubtedly respond in this wider context.

Introduction

Partners had an opportunity for a briefing from Defra and discussion prior to the closing date for the consultation. The Partnership is generally content with the thrust of the Part I proposals, though some organizations may have slight differences in their level of support for individual proposals.

Proposed Changes

Part I Game licensing

Proposal A – Remove Game License (RRO Proposal) – AGREED but:

We have been involved in the long running pre-consultation on this issue and are content that removing the Game License will have little or no effect in the prevention of poaching (lack of a Game license is occasionally used as a supporting charge in wildlife crime prosecutions).

We agree that adequate enforcement is likely to be difficult and costly and we agree that a general 'Game License' is probably unworkable given the current and likely future rate of compliance .

We are however ambivalent about the option of introducing a more focussed license that might fund conservation work with regard to wild deer. We can see some merit in

introducing a system that could offset the negative impacts of wild deer on biodiversity and might fund deer vehicle collision mitigation measures and potentially other impacts.

This work is currently funded by Government through the Deer Initiative either directly through core funding or through project funds. The current and likely future scale of impacts mean that increased funding for deer management at a landscape scale, through whatever mechanism, will be required.

We recognise that this would be at best an oblique way of funding such work since it is landowners not deer managers and stalkers who have the ultimate responsibility for the taking and killing of wild deer. We are also aware that there are, at most, 15-20,000 deer managers and stalkers in the UK and to produce a financially viable system may well impose an unreasonable burden on the industry.

Proposal B – Remove local authority and excise license (RRO Proposal)– AGREED

We agree that the introduction of the Meat Hygiene Regulations renders the current licensing system redundant and can see no benefit in retaining either. Those individuals/organisations processing and supplying venison commercially will now have to either register with their local authority or seek approval by the FSA depending on their throughput and method of operation.

Proposal C Remove restriction on dealing in deer during the close season, provided they were lawfully killed (RRO Proposal).- AGREED for the reasons set out in Para 68, 69 and 79-82 of the consultation.

Record keeping - We hesitantly agree with the preferred Option 2 accepting that the record-keeping requirements under S11 of the Deer Act should not be re-instated.

Whilst the incidence of poaching appears to be on the decline and thus the use of records in enforcement is less important there are other potential benefits that might be gained by one, more detailed set of records under a reinstated Section 11 of the Deer Act which would also meet the requirement of Regulation 178/2002. We have significant concerns over the future monitoring of deer culls (and hence our ability to prove a sustainable approach to deer management) in England and Wales. We accept that the current system has not proved a reliable mechanism for identifying culls in England and Wales (though the statutory requirements in Scotland have proved extremely successful). The new Meat Hygiene Regulations require primary producers to provide processors with significant additional information (through carcass tagging) which will currently be lost if legislation is not introduced to require processors to retain the information and preferably make it available to a competent authority.

‘Knowingly buying or selling unlawfully killed or taken game.’ – We agree that this offence should be retained.

‘Deterrence’ Para 221 of the consultation asks whether the removal of S13(2) is acceptable. We concur with the Defra view that other offences contained in the act already provide sufficient deterrent.

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