

***Summary of Responses to the Deer Commission for Scotland's  
Consultation on Close Seasons***

***March 2005***

**Summary of Responses to the DCS Consultation on Close Seasons March 2005**

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## Summary of Responses to the DCS Consultation on Close Seasons March 2005

### CONSULTATION PROCESS

The Close Seasons Consultation Paper was published on 29 October 2004. The consultation list included all members of the Deer Round Table, the Chairs of all Deer Management Groups, all local Authorities, Association of Chief Police Officers and factoring and woodland management companies. The initial deadline for receiving responses was 4 February 2005 but was subsequently extended to the 25 February to allow Deer Management Groups in particular, further opportunity to respond.

In total 1193 responses were received. Of these 1001 were received en bloc from the Scottish Gamekeepers Association and took the format of a pre-printed response within which respondents required only to complete their name and address. In addition a number of individually posted SGA pro formas were also received. Where the SGA pro forma had been annotated, this was analysed individually. A list of respondents is provided at Appendix 1.

### ANALYSIS

The primary purpose of the consultation process was to elicit the spectrum of opinions on close seasons current amongst those interested in deer management in Scotland. Specifically the consultation sought views on the concepts and issues behind the need for close seasons rather than seeking to concentrate on specific dates.

As it was intentionally not a referendum on a suite of proposed date, the analysis has concentrated on the range of statements produced. It has not attempted to rank the common responses by popularity.

In the following pages, each question is taken individually and the responses summarised using the following format:

- **Headlines:** Provides a snapshot of the spectrum of views.
- **Summary of views:** Outlines the broad spectrum of views
- **Graph of response by categories of respondents:** The respondents were subjectively put into 7 categories.<sup>1</sup>
  - Occupier- owner or occupier of any land.
  - Agency- any public body such as SNH, FCS or local authority.
  - Manager- whether woodland or open hill and includes the factoring agents.
  - NGO - includes both conservation, sport shooting and representative bodies.
  - Stalkers- open range
  - Stalkers- recreational
  - Stalkers – woodland.
- **Range of statements:** Where statements expand the thinking behind individual responses, these were highlighted and recorded.

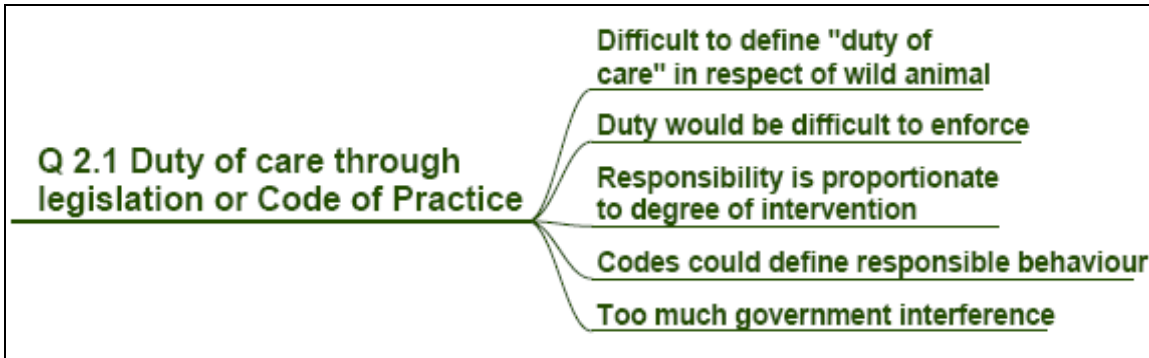
<sup>1</sup>

	Occupier +	Agency	Manager	NGO	Stalker open range	Stalker recreational	Stalker woodland	SGA
n	42	7	14	15	38	23	8	1047

# Summary of Responses to the DCS Consultation on Close Seasons March 2005

## Q2.1 Duty of Care through legislation or Code of Practice

### HEADLINES



### SUMMARY

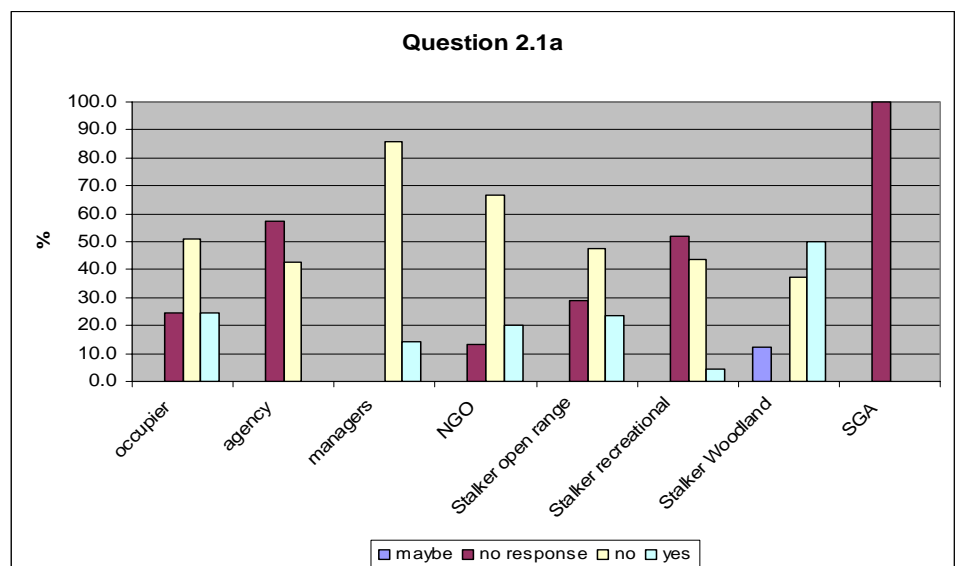
In absolute terms the majority of respondents were not in favour of a duty of care prescribed in law.

Amongst agencies and a number of NGOs there was agreement that the degree of responsibility should be proportionate to the degree of intervention and that in terms of deer managers this would be best described through a set of guides and not through primary legislation. The difficulty of providing a meaningful definition of duty of care that would stand testing in Court was put forward as a further reason for using codes but the quasi-legal status of these codes was also questioned. While animal welfare organisations believed in a greater degree of responsibility, codes were still viewed as the main policing method.

There was general confusion amongst respondents as to what the difference was between codes of practice and guides. LANTRA helpfully described the approach taken by Health & Safety legislation where a code of practice is sanctioned by Ministers, everything else being guidance. This guidance does have a critical role in providing learning support material and could be used to provide examples of how a practitioner met the Statutory Code when being challenged. LANTRA felt that with the low degree of intervention in wild populations the duty of care was limited and the duty of care rested with Government and the industry as a whole to ensure that there was the appropriate skilled and resourced workforce to manage deer.

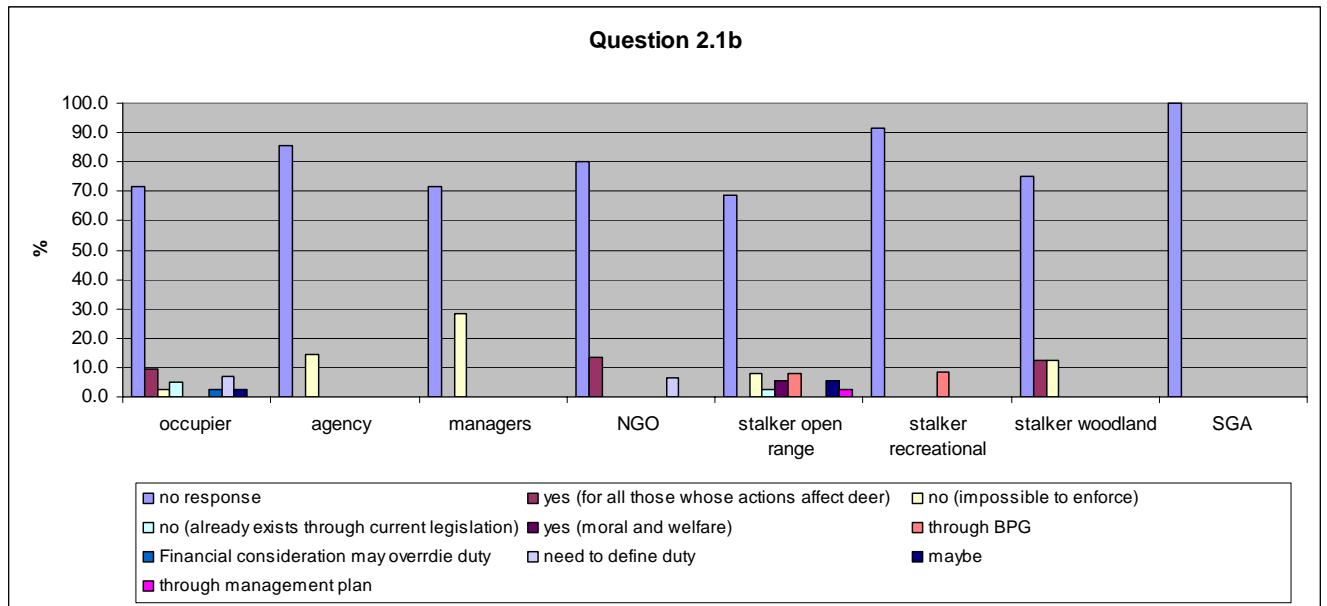
### By Categories

"Should there be a duty of care, prescribed in legislation, on those who manage deer?"

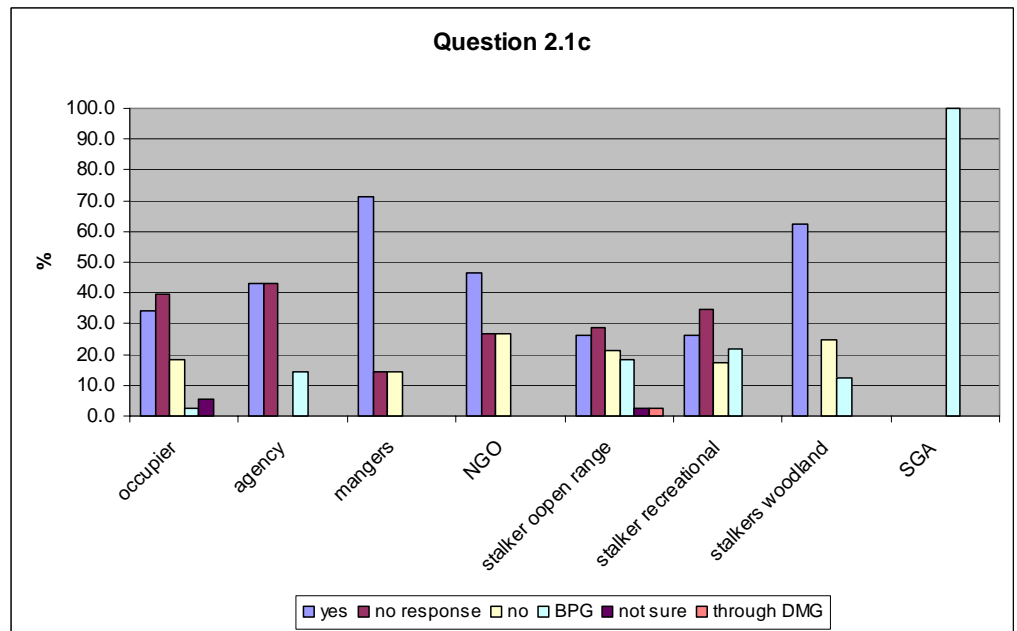


# Summary of Responses to the DCS Consultation on Close Seasons March 2005

"If so, why and how?"



"...Alternatively should Codes be introduced?"



## Summary of Responses to the DCS Consultation on Close Seasons March 2005

### Range Of Statements

Normal sportsmanlike behaviour - not legislation code ok
Not advocate legislation, enough of it
They need to take some form of responsibility
Legislation must be avoided at all costs (Nanny State)
Code of practice that deals with disturbance where deer are under stress
Compulsory record and weight recording and membership of your DMG and total openness of activities
Best practice codes should become the norm
The ring fencing of open range, of artificial feeding. This is not however the norm for free living deer over the majority of their range and it would seem stupid to legislate solely for these circumstances, Codes of conduct could be introduced for these situations.
Livestock, there cannot be any justification for treating deer differently. Separate codes of practice for those who manage wild deer and farmed deer.
Impossible to enforce, a code of practice would be helpful
By recognising requirements of wildlife and acknowledging under severe winter conditions shelter is required. Placing on the Forestry Commission a requirement to cater for this.
I do think it's wrong that someone can obtain an FAC one day and go stalking deer the next.
To make them effective there would have to be a mechanism devised to enforce them
We do not feel that there should be a legal responsibility on those who manage deer. We for see difficulty defining "those who manage deer". We have reservations over the introduction of codes.
Codes would be most effective in raising standards amongst practitioners. If Code of Conduct is not effective then there may be a future requirement for a legally enforceable statutory duty of care.
Duty of care already exists within DCS Best Practice Guide and within DMQ.
Codes rather than legislation should be sufficient to deal with a duty of care, professional stalkers being licensed by DCS to act as responsible people.
Legislation would need to be well designed in order to cover the various circumstances where deer are managed.
there seems to be little or no evidence that deer managers are compromising deer welfare
I do not believe the right to manage and shoot deer should be linked to land ownership
Duty of care involves 3 aspects: (a) Care of the national deer herd (DCS responsibility) (b) Animal welfare relating to the individual animal(responsibility of estate or individual manager) (c) Maintaining the quality and reputation of Scottish venison (meeting health, hygiene and meat quality legislation)
Should be able to demonstrate that they are able to meet the minimum standards of competency by showing a certain standard of safety and certification.
The duty of care should by proportionate to the degree of intervention. Coupled with the fact that other wild mammals do not have a legal duty of care, more consistent to address this through codes of practice rather than through legislation.
We believe that all those managing wildlife have a duty of care to the animals that they are managing, whether they are game animals shot for recreation purposes, or animals that are managed for conservation or other purposes.

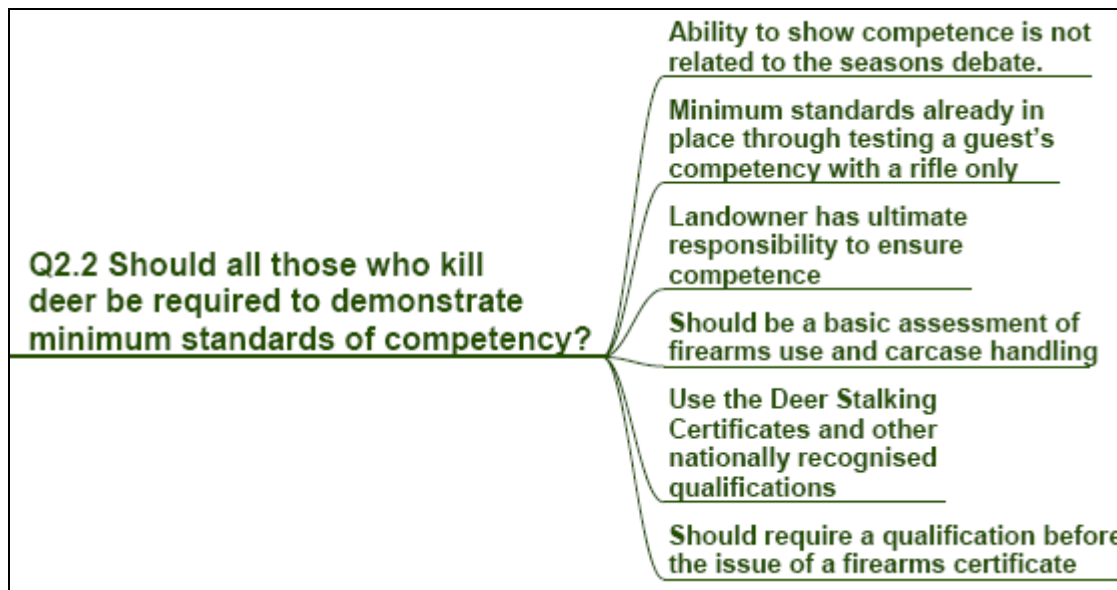
## Summary of Responses to the DCS Consultation on Close Seasons March 2005

An acceptance of a moral responsibility towards engagement with deer populations must incline the realisation that lethal control should not be used while there are management options that do not involve the killing of deer.
I am anti legislation but too many people are entering stalking who do not have any basic knowledge.
Perhaps premature to proceed to legislation. Duty of care, duty of careful stewardship encouraged by promotion of a formal code of practice.
Deer managers already have a duty of care in relation to deer stocks. No further legislation needed
Welfare response should be based around the type and degree of intervention made into the deer habitat. Continuing intervention in the population to maintain. Within the carrying capacity of the habitat. Whilst also having a close season to allow the animals to recover or breed and develop. Good management relies on economic criteria being met. The low degree of direct intervention in the wild population the duty of care is limited. In these circumstances a legal duty of care on operators is inappropriate. Individual cases of cruelty can be handled by existing legislation. In our view the most significant duty of care rests with the government and the industry as a whole ensuring that there is
We believe that the DCS should be responsible for enforcement of animal welfare law in relation to wild deer.
All those whose actions affect deer.
Codes would demonstrate a move toward a legal rather than moral responsibility on those who manage deer.
This competence must be seen by the stalker. Certificates mean nothing in practice.
There can be no legal duty of care for a wild animal. Drafting a law to make such codes legally binding and a failure to obey them, a criminal offence would be extremely difficult. Man's responsibility for welfare of wild deer occurs where positive action is taken during population management.
No objection to duty of care prescribed in legislation. We believe it would be difficult to define in law concepts such as a duty of care, or to identify clearly on whom that duty falls, in the context of our interaction with a wild species.
We support the principle of demonstrating competency and adherence to codes of practice, of which adequate monitoring of voluntary schemes and compliance with authorisation procedures plays an important part.
Causes of poor health are various and may not reflect the actions of the manager on whose land the deer may reside during a particular period of the year. The coding approach does not suit the management of wild animals.
Current restrictions on shooting and legislation on the protection of wildlife and animal welfare all provide adequate parameters which demand a duty of care when managing deer. The Deer (Scotland) Act 1996 and the Protection of Animals (Scotland) Act 1912 are examples of relevant legislation.
Agree with the principle that those who manage deer have responsibilities as well as rights. Exercise of their deer management and wider land management activities, ensures that a balance is struck between deer welfare issues and the need to meet land management objectives. Imposition of legal duty of care is not the best way forward. Support the development of a code a practice approach.
A duty of care should be imposed on any land owner who interferes with the natural range of deer, such as fencing or to those who provide supplementary feeding to encourage deer on to the land. Which point further intervention should take place to alleviate a problem?
How could it possible be policed? What protection will there be to stop legitimate control being constantly compromised by either malicious or ignorant complaints. The level of competency required should reflect the intensity of the control undertaken. Employed - DMQ2 / Semi-professional & self employed - DSC 1 working towards DMQ2 /Unsupervised leisure stalkers - DSC1 / First time & supervised sports shooters, standard shooting competency test.

## Summary of Responses to the DCS Consultation on Close Seasons March 2005

### Q2.2 Should all those who kill deer be required to demonstrate minimum standards of competency?

#### HEADLINES



#### SUMMARY

There was general agreement that competence should be demonstrated. There was however considerable divergence as to what this meant and what form the demonstration should take. A number of individual responses and SGA explained that taking a guest to a target was the most common method of competency testing and that this combined with Best Practice Guidance was adequate. These responses did not indicate whether there should be any form of independent check.

A number of NGOs and SNH were concerned that a legal requirement to demonstrate competency may have implications on the ability of landholders to control deer in season. This was taken further by a number of sporting NGOs in that they believed the ultimate responsibility lay with the landowner and that it was they who should ensure the competence check was appropriate. They also cited the well developed training and assessment opportunities offered through voluntary qualifications such as the Deer Stalking Certificates and S/NVQs in game-keeping and wildlife management and other equivalent qualifications.

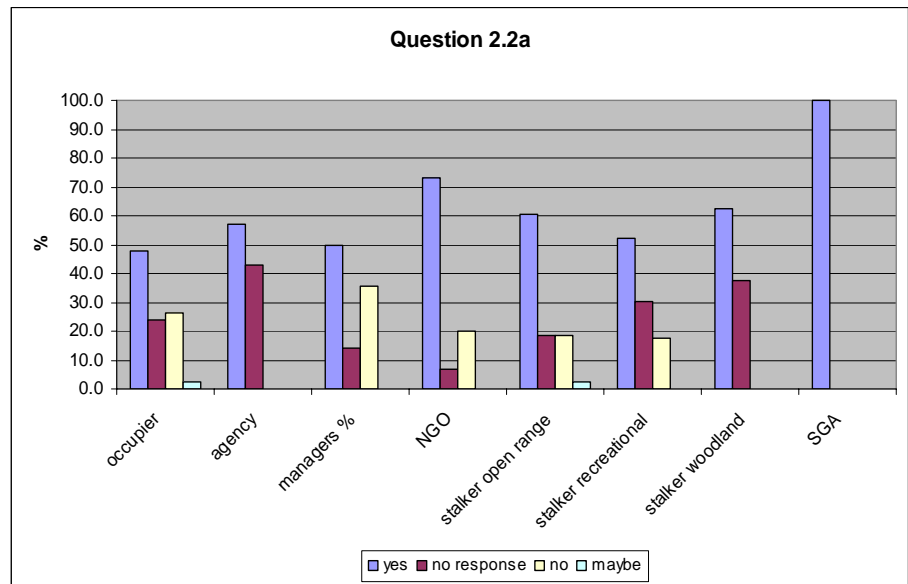
Some NGOs advocated that the demonstration of competence should be tied in with issuing Firearms Certificates. ACPOS, while supporting the concept, outlined a number of difficulties that would require much greater consideration before this approach could be considered.

A number of NGOs including SSPCA, the John Muir Trust and SRPBA believed that all who shot deer should be required to be independently assessed as fit and competent.

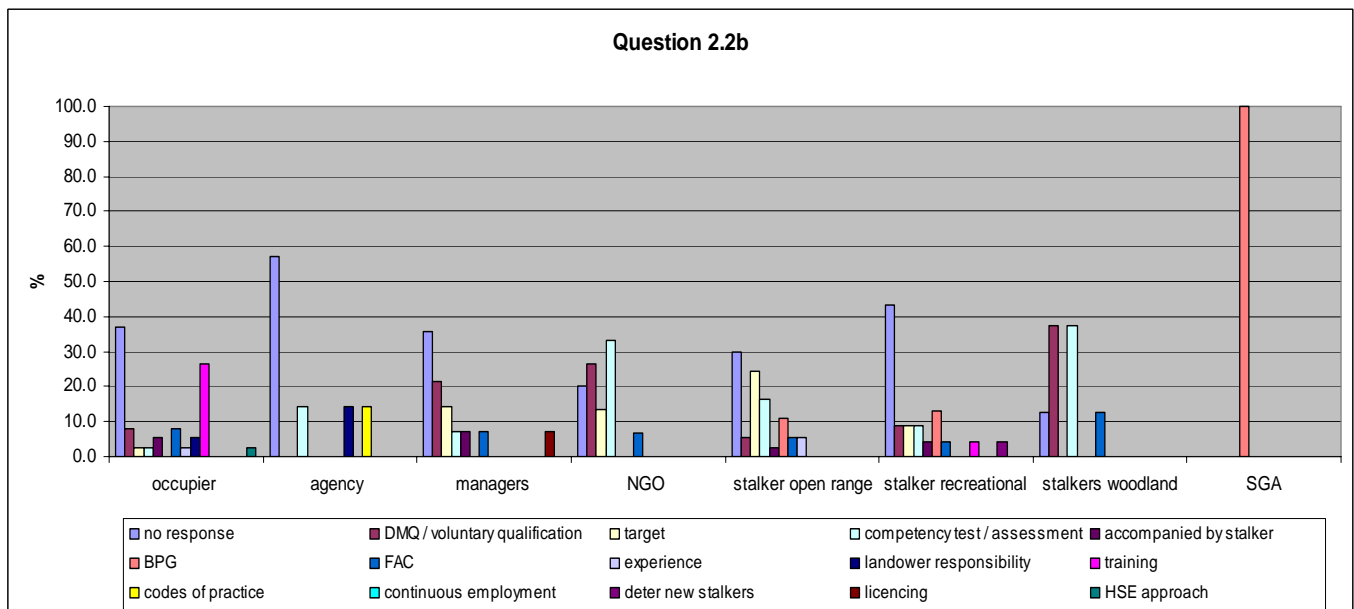
## Summary of Responses to the DCS Consultation on Close Seasons March 2005

### By Categories

"Should all those who kill deer at anytime, including sporting clients and first time shooters, be required to demonstrate that they are able to meet minimum standards of competency?"



"If so, how?"



## Summary of Responses to the DCS Consultation on Close Seasons March 2005

### Range Of Statements

Some passing a test might consider that they are an expert.
Basic assessment of firearm knowledge. Demonstration of basic carcass handling.
Should work towards European system of assessment.
In the text prior to this question a suggestion is made that a person should demonstrate competency in deer stalking before a condition is entered by chief constable on a firearm certificate authorising the use of a weapon for that purpose. In principle this is an excellent suggestion but there are many difficulties on the road to achieving this situation Scotland –wide. Firstly what would happen with current certificate holder who has weapons with which they are allowed under their certificate to shoot deer? What would be agreed as min qualification? How would this be viewed by those who feel there are already enough stringent conditions on their acquiring and possession of a firearm?
Be accompanied by someone, answering a few questions or shooting a piece of paper doesn't prove much.
Well run estate.
Demonstrate levels of competency.
Definitely, for example the FC, the majority of European Countries have examinations.
The current system is quite satisfactory. The formulation of a regularity body or the empowerment of the DCS to be the arbiter of who should shoot would be unnecessary and unhelpful. This question has nothing to do with close seasons and is no more than the DCS trying to create to create extra work for themselves.
keeper should oversee all practice shots with the right to refuse to take someone out
Current situation is probably satisfactory. Very open to avoidance.
To set the firearms certificate at different grades from target shooting through to the person who uses firearms only on conjunction with a stalker to alternate the stalker using a rifle on a daily basis to kill deer. I do not believe this is an issue for the DCS. I cannot see why fit and competency should only be dependent on the position where an out of season licence is given.
This would cost employment and income to rural areas.
Defining "qualified person": this should be an individual who has formally shown a level of practical competence in health and safety, deer recognition, an understanding of deer biology and good working practice.
Shooting of deer with a rifle should depend on demonstration of a certain minimum level of competence.
The casual stalker should have some form of competence prior to killing deer. A test could be made and merged with a fire arms certificate.
Everyone starts off incompetent.
We do not feel that questions like this belong under a consultation on "close seasons". We feel that there is no proven need for such a requirement and support the voluntary uptake of both training and assessment.
Further advice to practitioners could be disseminated through the BPG. It is essential that the standards cover ecological and habitat issues as much as the animal welfare and firearms safety
There already exists DMQ levels 1 & 2, all sporting quests are required to demonstrate competency on a target and are usually out under guidance of a professional.
It should be allowed for a non licensed guest permitted to shoot deer when under the supervision of a professional stalker. An alternative could be the introduction of a general hunting qualification covering all species.
Firearms certificates endorsed for shooting deer should only be issued to those who can provide two adequate referees, one of whom must be qualified to appropriate DMQ standard and will certify that the applicant has achieved the minimum standard required to be regarded as fit and competent. Novices or sporting clients should always be accompanied by someone who is qualified. Carcass tagging could act as a safe guard if tags were only issued to those qualified to meet minimum standards.
Possession of a FAC should be considered adequate but possibly with a simple text on granting or renewal of certificates.
Any shooting party should have at least one qualified person named as in charge. Firearms certificate should also require training.
Any reduction in shooters would lead to decreased culling.
No further controls are required on use of firearms by farmers or their agents to control deer.
Demonstration of competency a legal requirement would have significant implications for the ability of small holders to manage their deer in season and accentuates the disparity in the regulations governing the control of other mammals.
Would support the wider promulgation of collaborative Best Practice Code.
Anyone who intends to kill a deer should be required to undergo rigorous training. We would recommend mandatory training and testing, regulated and licensed by the Deer Commission Scotland.

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<p>Procedure adopted for example in training bird ringers (make A, B and C class licences permitting different levels of independent activity).</p>
<p>Primary responsibility rests with landowners and occupiers who have the legal right to shoot the deer. That responsibility is defined by variety of legislation and regulation including; criminal negligence, deer, firearms, health and safety, animal welfare and others. All that health and safety law requires is that people receive adequate training. The traditional process of people being guided by experienced practitioners is a form of dynamic risk assessment and risk management that is also very supportive to of authority and responsibility from those that have the right to kill deer, namely the owner or occupier of the land, to the person taking a supervised cull shot. In my view it does no such thing. As indicated earlier people acquire competence in a variety of ways. Responsibility for competence rests with the person or organisation that has the right to shoot deer. It is likely that the vast majority of these deer were culled by people operating competently. Generally it is the activities that contain the highest safety risks that have mandatory systems. The requirement for mandatory qualification is proportionate to risk.</p>
<p>Too many out of season licences are being issued by DCS to places where it is unnecessary. DCS should inspect each place first. A small block of trees of hill ground, without fences should not be an excuse to shoot deer out of season.</p>
<p>Those who own land and hold the right to kill deer on their land have a responsibility to ensure that not only they themselves but also their employees and all those whom they allow to shoot deer on that land are fit and competent i.e.; sufficiently qualified.</p>
<p>A simple extension of the firearms certificate application process. Should be a requirement for two referees to verify the fitness and competence of the applicant in terms of ability, experience and attitude. There is a rapid move towards bringing training standards into the industry, which we support, we would be reluctant to tinker with a system that works well and which could, if overly bureaucratic restrict the market.</p>
<p>Supports the broadening of the principles that demonstrate competency beyond deer commission for Scotland authorisations, principally through supporting best practice, codes of practice and through procedures for firearms certification. A legal requirement would have significant implications for the ability of small holders to manage their deer in season and would further accentuate the disparity in the regulations governing the control of other mammals. Not be in favour of extending the fit and competent person test to those who are accompanied and supervised by a fit and competent third party.</p>
<p>The person responsible for supervising the killing of deer should only be required to demonstrate that he or she is suitably competent in the event of an incident that requires investigation.</p>
<p>Anyone putting carcasses into the food chain for public sale should also have DMQ2 everyone shooting deer should have to prove competency and safety. This could be done by not issuing/renewing an FAC without proof of competency.</p>
<p>Needs to be in the hands in national body. Not control by various organisations with a purely financial interest.</p>
<p>Yes but responsibility for assessing should be devolved to a low level.</p>
<p>Deer Management Qualification system provides a good basis on which to build, but that other national and international qualifications should be respected where appropriate. An accompanied stalker, we would suggest that a Best Practice Guide covering this situation require stalker demonstrates an appropriate level of marksmanship.</p>
<p>Anyone who is expected to or those who wish to kill deer should be independently assessed as fit and competent by a person holding an appropriate Deer Stalking Certificate.</p>
<p>Believe such matters as damage assessment rest with the owner or their agent and disagree with the idea of means testing. One problem arising out of means testing, apart from the obvious extra bureaucracy, is that it often requires a financial evaluation, which many of our clients regard as confidential or subject to personal interpretation.</p>
<p>Fitness and competence should be demonstrated through an independent, formalised assessment process.</p>

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## Q3.1 Are there moral reasons for a close season?

### HEADLINES



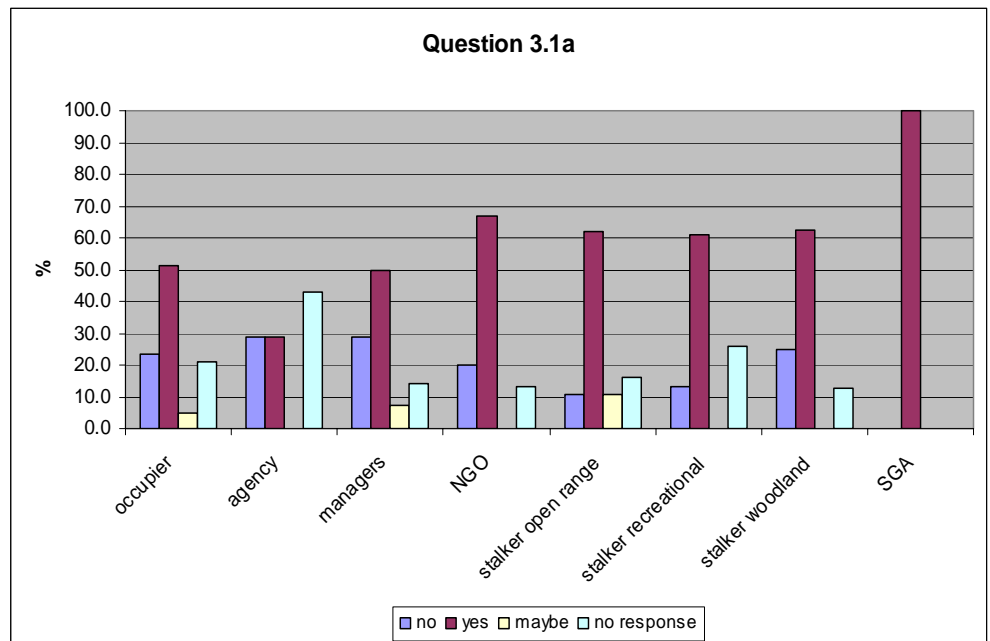
### SUMMARY

There was no clear opinion as to whether there were moral imperatives that dictated the need for close seasons. A number of respondents commented on how other mammals were not subject to the same degree of legislative control as are deer. SSPCA, RICS Scotland and ADMG thought the moral reasons for close seasons depended on the degree of intervention.

A number of respondents commented on the 'distasteful' aspect of shooting pregnant hinds and felt there were welfare considerations to shooting females at certain periods as well as shooting stags after the rut.

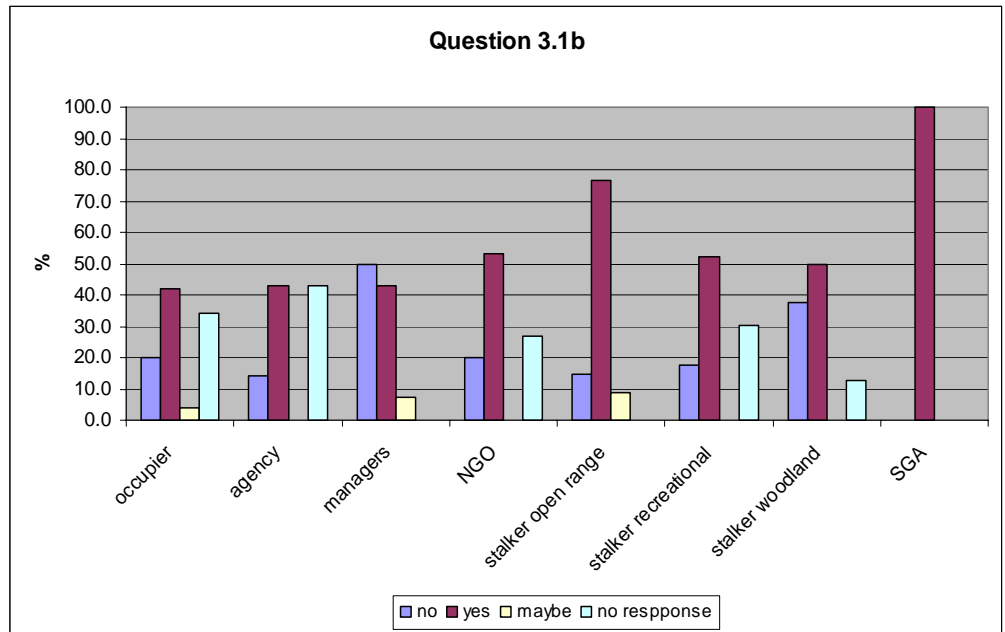
### By Categories

"Under current deer legislation there is a requirement for a close season to be set for females. A close season for males is discretionary. Are there moral reasons for deer **of all species** ..... having a close season?"



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".... and **both sexes**  
having a close  
season?"



## Summary of Responses to the DCS Consultation on Close Seasons March 2005

### Range Of Statements

Morally there is no reason for males to have a close season.
Once rut is complete to shoot stags is akin to catching spawning salmon. Unscrupulous people may also see this as just another to take out clients only interested in trophy head.
Females not when heavy with calf, only reason advanced to October 1st allowed recuperating. Red deer stag season is ok.
Yes, male requires a recovery period. Pregnant female is repugnant.
Yes there is moral.
There is no "moral" argument worth its salt. To argue that there is hypocrisy. Knowledgeable stalkers should be allowed to run their estate as they see fit, i.e. no close season for the deer.
This should apply to male and female alike in the spring when little feed is available.
12 month of shooting would disturb the deer too much.
It ensures the product, i.e. venison is of an acceptable quality.
Quality of venison will go down. Deer treated as vermin so taking away rural income.
The very fact that there are those who now call for unlimited season's shows that legislation is needed.
The welfare aspect of relentless disturbance to adults of both sexes. As a parallel take, for example, cold weather orders prohibiting woodcock shooting.
Close seasons should be based on objective data relating to the importance of the desired objective.
As long as animals are culled as humanely as possible, I can't see that there is a convincing case for having a close season at all.
Venison market ruined by putting out of season animals on the market.
Heavily pregnant should not be disturbed or stressed. Stags after the rut are exhausted, should not be disturbed.
There should be a close season for male deer but there may be reasons that override control of numbers and distribution/colonisation.
It is immoral to cull heavily pregnant female's young or new born calves and deer in springtime when they are inedible and unmarketable.
However there is no need to have a close season for males.
Less reason for having a closed season for males. Open hill stags suffer if stalking during the late winter and spring to suggest a minimal closed season from December to May.
To protect the welfare of the deer - stags need a period of recovery from the rut and the winter.
A widening of the season for male deer would assist a more flexible approach to deer management.
There is already far too much talk of morality in the management of wild animals
In the interest of protecting our internationally renowned and economically essential open range red deer stalking industry, some protection should be provided to stags during their wintering period.
So long as red deer are protected by statutes the least that can properly be done to protect them is to have a close season for each sex.
The existence of a close season for deer and other game species, but not all species have evolved largely for historical and cultural rather than welfare reasons.
Deer should not be harassed all year round, it compromises good management.
A closed season for males should be imposed as this would protect them from being the targets of sport shooting. Lack of a closed season for sport shooting might have negative effects on the vitality of the deer population.
However population control has to be through limiting female numbers, so there is little reason for abandoning close seasons for males.
Males should be protected for quality of venison, run down stags should not enter the food chain.
Moral? That harks back more towards the pragmatic purpose of seasons in regulating competition between neighbouring landowners.
An all year uncontrolled shooting policy would go against all the principles of species protection which apply to other non-pest animal species.
Red deer enjoy an iconic status among both the shooting and non shooting public. Treat the species with respect, if we wish to maintain their status.
No moral requirement to allow wild deer into all woodlands and fields or to provide them with supplementary food in winter. There is a natural humane aversion to harassing male deer all the year round and the result is usually counter-productive in deer management terms. Close seasons should generally be as short as possible without prejudicing animal welfare so that resorting to exempting and risking welfare impacts will occur as seldom as possible.
For surviving deer, whether males, females or juveniles, disturbance as a result of being swept up in a culling operation can have negative welfare implications, particularly when animals are in poor condition as they often are after a long hard winter and a cold wet spring. We maintain the view that Males of all species welfare can be

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prejudiced by culling disturbance at any time when in poor condition, for example following the rut or at times of the year when they do not have access to shelter or adequate feeding.

Accepts the principle that the greater the level of intervention in the management of a wild species, the higher the level of moral and ethical responsibility for the welfare of that animal, female and male equally. Do not believe there to be strong arguments, on biological or animal welfare grounds, to support legislation for a close season for male deer, providing stalking is carried out in accordance to best practice. Believes that it is appropriate to retain a discretionary close season for male deer.

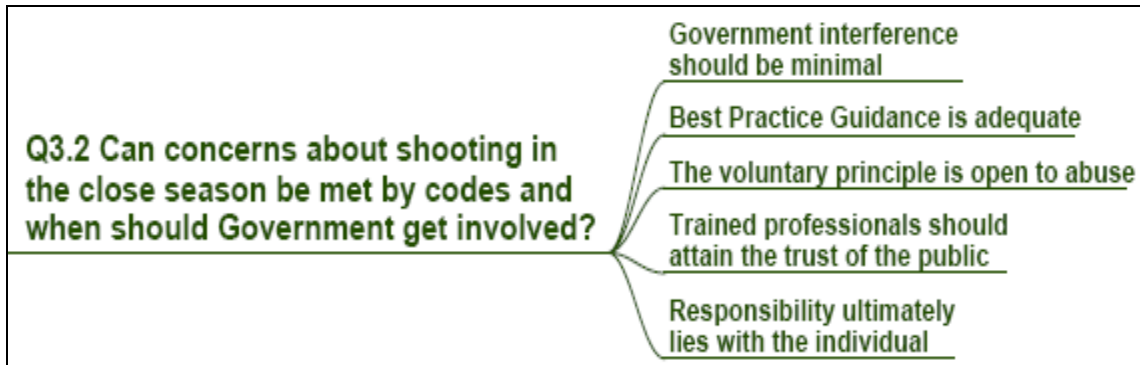
I have not heard of the close season for males being discretionary although from the amount of licences for out of season shooting - one might imagine that it is discretionary.

The moral issue would depend on the level of intervention on individual estates.

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### Q3.2 Can concerns about shooting in the close season be met by codes and when should Government get involved?

#### Headlines



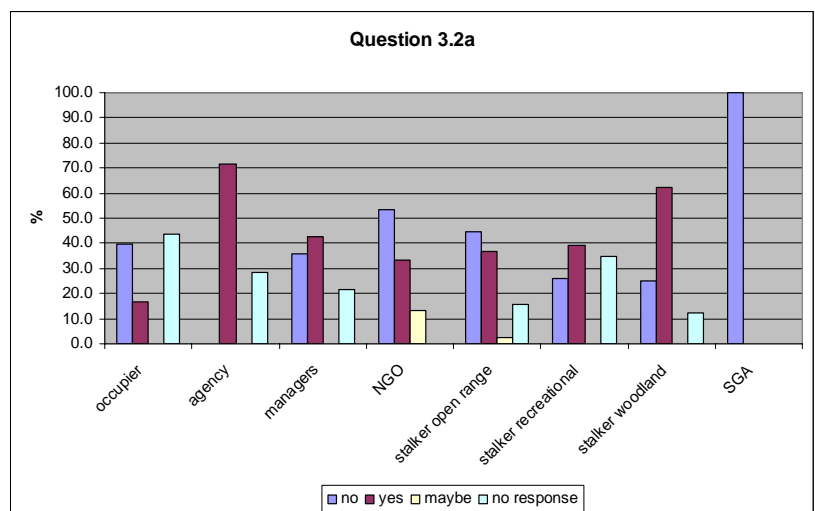
#### SUMMARY

There was no clear outright overriding opinion expressed. Most of the agencies agreed that codes and best practice guidance had a strong role to play in reducing the development of welfare issues. There was recognition that in practice this was already happening due to the owner occupier right to shoot to protect against damage.

There was a split between the NGOs. Some argued that government intervention was required to moderate welfare concerns during particular times of the year and that this should be through a close season with appropriate authorisations. Other NGOs felt that with the development of best practice and that ultimately the responsibility for welfare could not be derogated to a third party, there was no need for legally imposed close seasons. Those same NGOs strongly supported the application of voluntary close seasons implemented through agreement at the Deer Management Group.

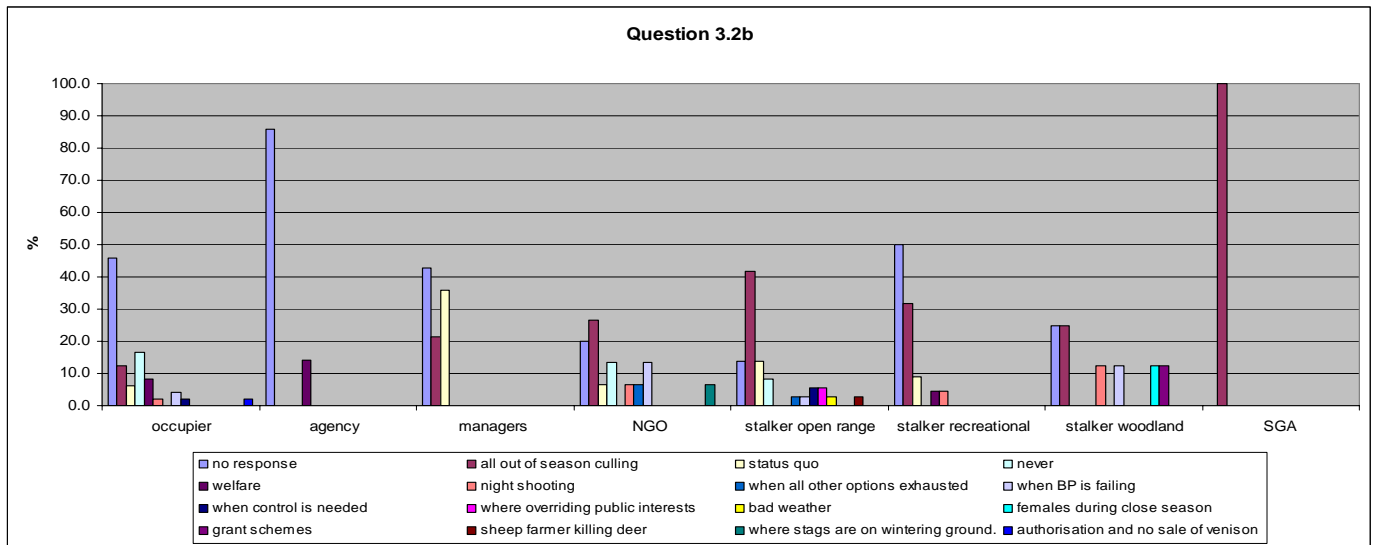
#### By Categories

"Are there legitimate concerns arising from deer management/control during the close season that can be met through practitioners following Best Practice and voluntary codes of practice?"



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"Under what circumstance do you think that these decisions should be moderated by government?"



## Summary of Responses to the DCS Consultation on Close Seasons March 2005

### Range Of Statements

Tighten up closed seasons and night shooting.
Night shooting is dangerous, should be outlawed.
There are no legitimate reasons for heavy culling by anybody for either sex during the close. Only exception in the interest of animal welfare. This should be up to owner/occupier, no circumstances for government to get involved.
Voluntary codes of respect, i.e. better monitoring, loop holes in legislation
Voluntary codes of practice are abused.
What is wrong with the current legislation?
The solution is wildlife managers who are properly trained and therefore have the confidence of the public.
Once again best practice should prevail.
BPG codes
There is abundant evidence that the voluntary principle does not work throughout the deer industry.
The answer will depend on whether DCS adopt a minimal approach to close seasons. This should not be just left to voluntary Codes of Practice.
Closed season should be defined in legislation.
Prescriptive legislation.
Authorisations, as at present, should be used to control out of season shooting.
BPG should be sufficient unless there is strong evidence that it is not working.
The introduction of government interference would be counter productive and mistaken.
Working to a best practice ideal is a good theory – still need monitoring just as legislation does. Legal guidelines are needed, to work strictly to.
The DCS Board does need a correct cross section of the venison industry.
Self interest by conservation groups can manipulate management/control. Removing fences for blackcock and capercaillie then shooting deer in the woodland
Culling out of season not effective long term, will impact on neighbouring interest. Could have economic impact on estates and rural employment.
Concerned about issues relating to public access to the countryside during periods when shooting may be taking place. Access takers are in many respects protected by knowledge of the close seasons. For low ground and forest shooting best practice guidelines and voluntary codes can ensure that public safety is adequately taken into account
Out of season shooting Authorised by DCS.
Such codes do not appear to work, the worst offender government related bodies.
Best Practice seems like a contradiction in the context of shooting out of season deer.
I thought the red deer were already regulated through deer management groups with counts carried out and culls agreed by the governing body, the DCS.
In circumstances where legal protection on wintering stags was removed – and we do not support this – national guidelines should also recognise the essential contribution to the rural economy provided by red deer stags.
The government should not be brought into this except by taking advice from the DCS.
In 1954 all deer hound and deer hunting were banned. This meant that the wounded deer were not followed up. Permitting deer hounds to follow up wounded deer would solve the problem.
We are not in favour of legally imposed closed seasons, but support the idea that deer management groups or individual managers could apply voluntary closed seasons that are applicable to their particular objectives.
If control is needed it should be authorised by DCS.
We are keen to encourage DCS to look for a solution that provides the greatest flexibility for the industry. We would encourage that regulation should be used only where there is a transparent, definable rationale which sets out why an issue cannot otherwise be addressed through the use of codes of practice or BPG. We feel it is important that the industry is encouraged to take responsibility for the sustainable management of wild deer and that this is undertaken in an open and transparent way.
With hinds in poor condition and no milk, calves have weaned themselves in bad condition and will be lucky to survive the winter.
Close seasons should be governed by legislation to protect all interests.
No government involvement required. Perhaps marauding deer could be shot. I am uncomfortable however that a person who shoots a marauding deer has property in its carcass and may offer for sale.
Currently exemptions are insufficiently policed to ensure that all out of season shooting really is proportionate and justified by damage.
Legitimate concerns arising from deer management/control during close season, particularly in relation to culling without authorisation under occupiers' rights. Ideal world all out of season culling should require an authorisation which should include a commitment to follow relevant Best Practice.

### **Summary of Responses to the DCS Consultation on Close Seasons March 2005**

A tradition stalker is likely to have followed Best Practice throughout his life having inherited his skills and knowledge from his father (or head stalker). There is no harm in there being sensible and practical voluntary codes of practice.
Deer Management groups have been set up to co-ordinate the management of deer that range freely between properties; they should be consulted before out of season licences are issued.
Government should not seek to intervene in deer management beyond specifying when deer may or may not be killed.
Close seasons are currently enshrined in legislation, the right of occupiers to take action at any time to protect property means that, effectively, the decision whether to operate a close season is already at the discretion of land owners and occupiers.
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.

# Summary of Responses to the DCS Consultation on Close Seasons March 2005

## Q3.3 Should seasons vary by species and sex?

### Headlines

**Q3.3 Should seasons vary by species and sex?**

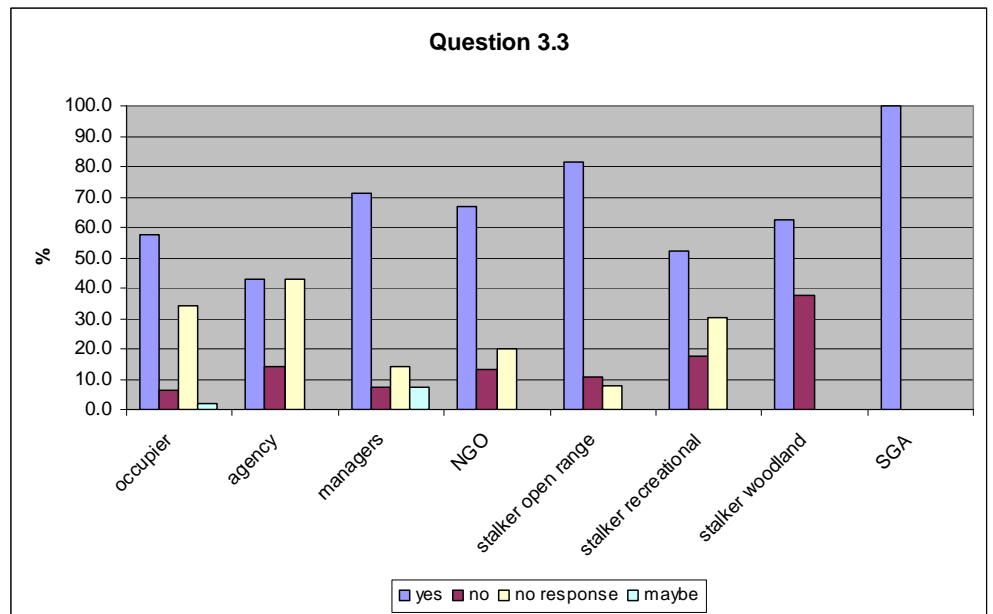
- Change where the welfare risks can be related to periods unique to different species
- Biological variance not so great that warrants different timings
- Greater variance between woodland and open range rather than between species
- Compact female season based upon critical periods

### SUMMARY

There was a majority agreement that if seasons were in place then they should vary by species. The reasoning given was that different species had different biological and sporting requirements. However a number of NGOs advocated a compact close season based on females having dependent young and if this was adopted, they would advocate no differentiation. There were a number of NGO and agency responses that believed the biological variance was not so great as to warrant different dates for species.

### By Categories

“Should seasons vary by species?”



## Summary of Responses to the DCS Consultation on Close Seasons March 2005

### Range Of Statements

Closed seasons for muntjac and Chinese water deer should be introduced. Additionally no min. calibre required for these deer. Would suggest .222 REM.
Happy with the seasons for red deer.
Seasons should vary by species.
People will express concern about young calves being shot and this can be dealt with by a code of conduct.
There are stronger management, sporting and revenue arguments in favour of seasons for roe deer being different from those for red deer. Appears anomalous that roe deer can currently be shot until much later in gestation period than the other species.
Open hill red deer have a different biology to deer in woods and the seasons should reflect this.
From a biological point of view it would make sense to rationalise the hind season to coincide with the roe doe season. With reference to male deer of all species there is no biological reason why they should not be culled all year.
This recommendation does not mean that female deer have to be shot up to the last day in march or from the first day in September, however, it will give some field operators the option to do so if necessary to achieve cull targets/prevent damage.
Stags of other species live in a kinder habitat and therefore it is not quite so necessary for them to have a close season.
This would be a benefit, especially sika deer when big estates are busy at red deer.
Yes for obvious reasons e.g. roe buck stalking in spring summer.
Yes where there are welfare risks which can be related to species specific timings
Vital that the calving times of the different species of deer. The impact of climatic changes on these are the subject of regular research.
Exception would be Muntjac where the close season might have to be abandoned.
Seasons for males are largely political. Variation may depend on need for a regulatory cull. For females must reflect vulnerability of dependent young.
Depending on their lactating periods.
It may be possible to establish a uniform close season for females of all species. Situation for males is more complex and for the most part our members favour no change.

# Summary of Responses to the DCS Consultation on Close Seasons March 2005

## Q3.4 Should seasons vary geographically?

### Headlines

**Q3.4 Should seasons vary geographically?**

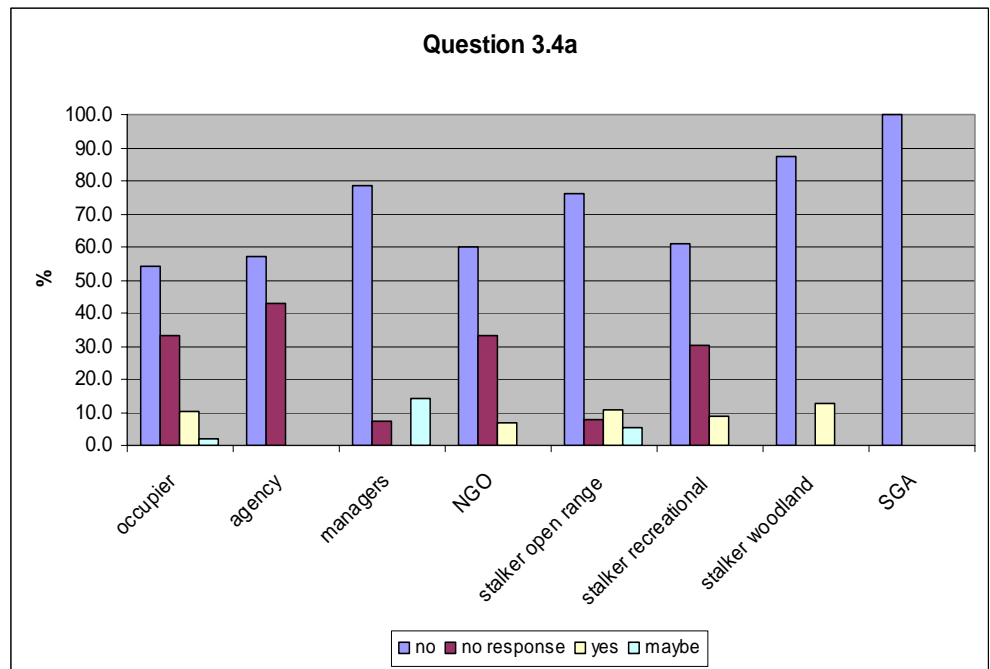
- Too complicated
- Difficult to police
- Flexibility can be implemented through codes

### SUMMARY

There was general agreement that while there were different considerations between geographical and woodland v open range habitats, the legislation required would be too complex.

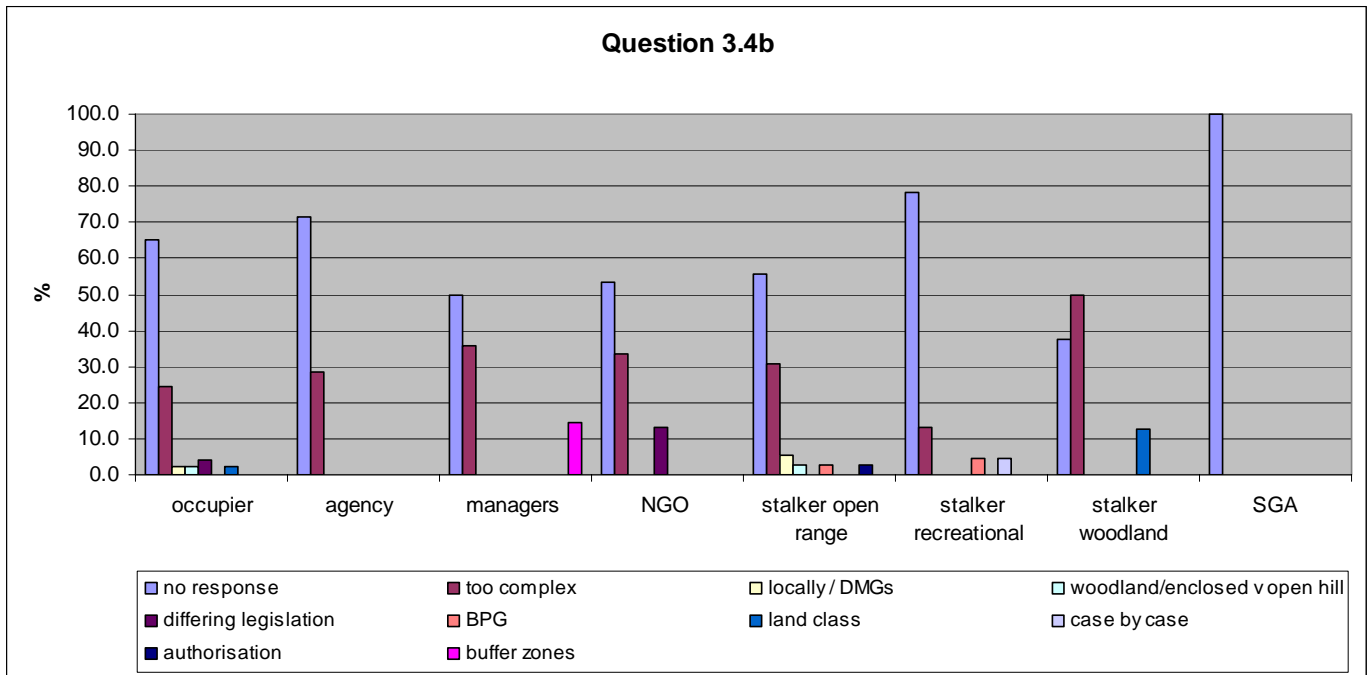
### By Categories

“The relationships between climate, habitat and human management objectives are complex. Should seasons vary to take account of either geographical or habitat considerations?”



## Summary of Responses to the DCS Consultation on Close Seasons March 2005

“If so, how could this be practically achieved and enforced?”



## Summary of Responses to the DCS Consultation on Close Seasons March 2005

### Range Of Statements

No, we do not support local arrangements. Current seasons are there for a reason and there is no evidence to suggest any radical changes.
Believes that, on open hill ground, the needs of both sporting interests and access interests are best met by ensuring that the open and close seasons are easily understood.
This cannot be readily adjusted by enforceable legislation.
Difficult to police.
Creation of corridors and the use of environmentally/animal – bird life friendly equipment.
Anybody involved in deer management or stalking or culling should know that fawns and calves are dependent on their mothers until nearly 1 year old.
There is a significant benefit to a simple system. A six month close season would seem to cover this variation for all four species in most Scottish habitat and geographical conditions.
Prohibitively complex.
Variations in climate from year to year within the same region can have just as much impact. There are valuable advantages in fixed national closed seasons. The interface between deer management and public access is becoming increasingly important and fixed seasons are an important consistency.
Flexibility is the key to sound management.
A precautionary window of dates that encompasses possible variation due to geographical or habitat conditions would appear more practical. Close season authorisations or codes of practice could still be used to provide flexibility.
The introduction of variable close seasons to account for geographical or habitat differences would make enforcement difficult.
Sooner see the seasons the same throughout the whole UK. Universal seasons which are selected are sufficient in length to cover the full range of biological seasons.
In the east red deer seasons could be extended while remaining unchanged in the west where a combination of weather change and loss of wintering ground to forestry interest has made life increasingly difficult.
The bigger issue here in Scotland is loss range to the red deer herd due to fencing and forestation.
Would cause huge confusion and could increase poaching.
This would cause chaos amongst professionals, amateurs and the trophy segments of stalking.

# Summary of Responses to the DCS Consultation on Close Seasons March 2005

## Q3.5 Should close seasons take account of the stage of pregnancy?

### HEADLINES

<p><b>Q3.5 Should close seasons take account of the stage of pregnancy?</b></p>	<p>Acceptance that not a welfare issue for the foetus</p>
	<p>Emotive issue with public perception concerns</p>
	<p>Is disagreeable to certain practitioners</p>
	<p>Welfare issue if disturb excessively near full term females</p>

### SUMMARY

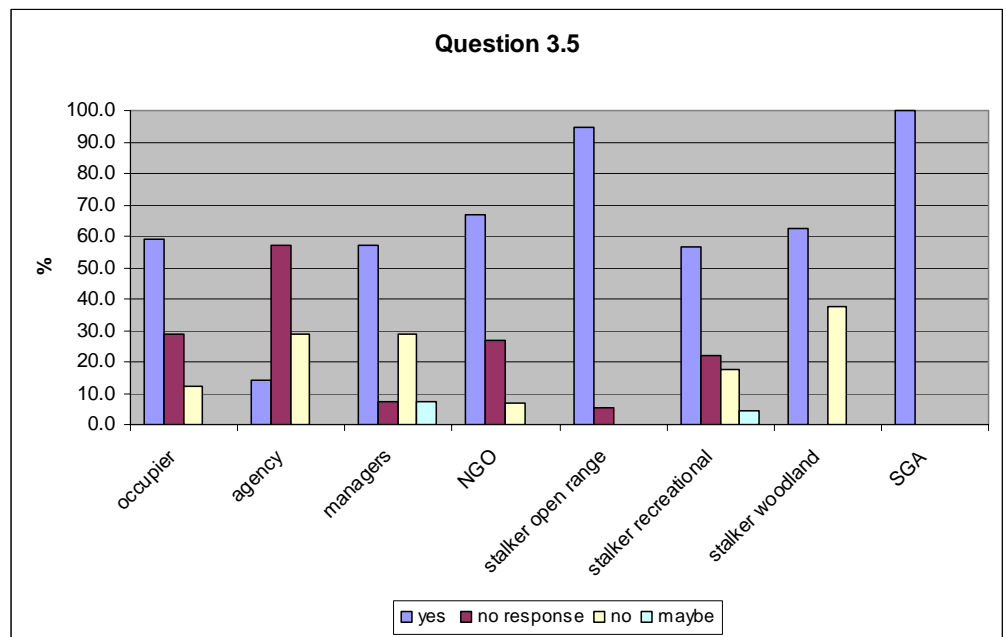
The majority of responses thought that close seasons should take account of the stage of pregnancy. The arguments for this included the abhorrence of shooting females in late pregnancy both from the sensitivities of the stalker but also from the possible reaction by the general public.

One welfare argument advocated by a number of NGOs was the possible risk to females close to full term from excessive disturbance, although no evidence was cited. Additional arguments included the need for a close season for females that covered the calving dates and a period beforehand to allow for early calves.

Advocates for Animals and League Against Cruel Sports did not agree that hinds should be shot while they were pregnant and felt that there was a welfare issue for the growing foetus.

### By Categories

Should seasons take account of the stage of pregnancy?"



## Summary of Responses to the DCS Consultation on Close Seasons March 2005

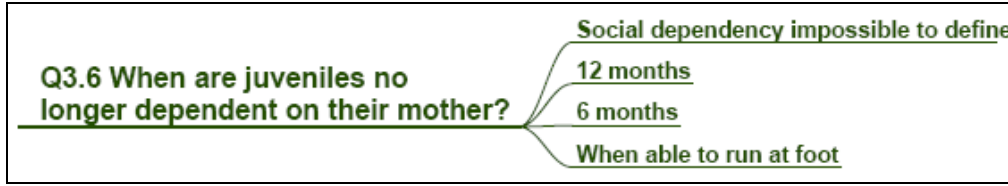
### Range Of Statements

Calves die in womb - no moral issue, should not dictate seasons.
Red hind season should not be before Christmas.
Make some guidelines.
No - this is "Bambi" thinking, deer are one of the few natural assets that estates can run for profit and for the benefit of the whole community.
This is highly emotive subject and the Council believes that it is important for public acceptance of good deer management that wherever possible, deer are not shot in late pregnancy. The Council believes that the close season for roe deer should be brought forward to protect does in the later stages of pregnancy.
Pregnant females are both welfare and an ethical issue.
No stigma should be attached to those wishing to carry on as long as welfare issues are not compromised.
Asking them to conduct extremely disagreeable culling operations of mothers near giving birth is itself undesirable. Furthermore, such a move would give rise to amazement abroad.
Stalkers do not like killing heavily pregnant hinds and there are moral issues to be addressed (e.g. the anti abortion lobby)
They are fine as they are - much prefer to cull pregnant females rather than orphan calves/kids.
Scientific evidence of foetal brain development does not justify culling late pregnant animals.
Welfare and ethical issues should apply only to living animals.
Scientific advice should inform this debate.
Welfare implications.
A 1st March close season start date for all female deer would recognise that some two-thirds of foetal growth occurs in the final third of pregnancy.
Shooting hinds should be a culling operation. Either it is necessary or it is not.
As well as being abhorrent to most stalkers, it is difficult to defend shooting in late pregnancy to Joe public.
Largely of public perception and PR, we strongly advise that the DCS be cautious of advocating any extension to the season which could involve unpalatable images of pregnant hinds and unborn or newborn calves.
The trust believes that shooting pregnant females is not a deer welfare issue, though it may cause distress to the practitioners; therefore affect the dates adopted within voluntary codes of practice.
Defined so that no pregnant female may be shot.
Always the risk of early calves.
Feb 15 is too late for red deer hinds - January 31 or even Jan 20 would be more suitable
Unless in very poor condition, female deer can also cope with some stress until very late in pregnancy without the risk of aborting.
Late pregnancy and when calves are very young.
Should cover the birth of a calf, and period of some months before hand to protect the welfare of the female, in addition to a period during the early life of the calf, until it is capable of accompanying its mother full time.
Few stalkers would be willing out of choice to kill a hind in heavy calf.
There is no difference between shooting a pregnant hind in January as in march. Seasons should take likelihood of calving into account so as not to orphan young.
stop culling before start of April
Perhaps we should look at a slight shortening of the control period for each species in the last month or so of the gestation period.
Not be disturbed during the later stages of pregnancy or for some months after giving birth.
no one wants to shoot heavily pregnant hinds
The season should finish in time to ensure that no early calving females are likely to be shot, but otherwise we feel the issue of shooting heavily pregnant females is best left to be determined by discussion and agreement between deer managers and their employers.
Many of the welfare issues can be dealt with by using truly fit and competent individuals.
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. Cannot share the confidence of the DCS consultation document that the foetus is unlikely to experience suffering when deer is shot.

# Summary of Responses to the DCS Consultation on Close Seasons March 2005

## Q3.6 When are juveniles no longer dependent on their mother?

### HEADLINES

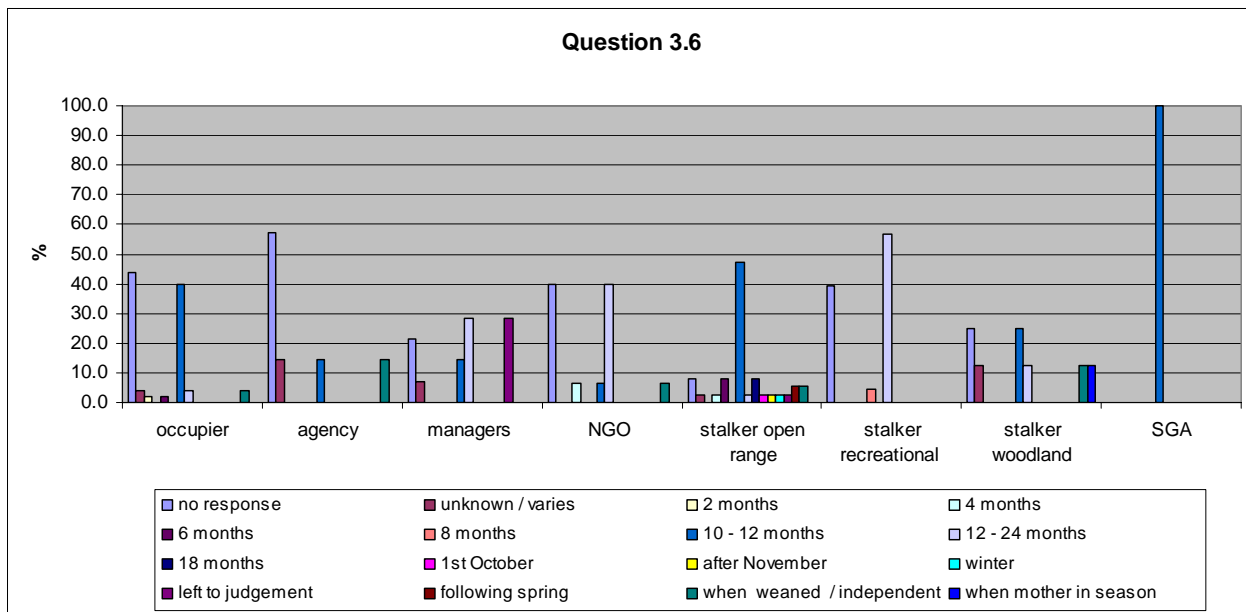


### SUMMARY

The majority response was 'no response'. Of those that had an opinion the majority view was that it was difficult to set the date, but if supplied, this ranged from 2 months to 24 months, with a slight weighting to 10 to 12 months. There was clearer opinion about the ability to set a date regarding when the juvenile was no longer nutritionally dependent on its mother and this was related to weaning.

### By Categories

"When are juveniles no longer dependent on their mothers to the extent that there are no welfare implications?"



## Summary of Responses to the DCS Consultation on Close Seasons March 2005

### Range Of Statements

10 months
Largely beyond dependency, one year from birth.
The following spring.
The Council believes that the current close seasons are a suitable compromise between the welfare of calves and the need to cull hinds.
Any answer to this question would be purely speculation and dependent on a number of varying factors e.g. habitat, age and condition of the juvenile and mother, prevailing weather etc.
A very good reason for restricting night shooting to a minimum.
When they are dead
Lactation may extend beyond the period necessary to support life in the juvenile for other reasons. Juveniles moving in a herd will learn life skills from the rest of the herd even if the mother is removed.
The young may starve to death. It is considered morally wrong to allow this.
Better dealt with in cull practice than legislation.
The situation should be capable of assessment by any competent stalker and dependant calves shot at same time as mother.
Dependant on their mothers for 18 - 24 months. If the mother is wounded and needs to be shot then the dependents should be too.
Huge variation in the seasons for males and females throughout Europe. In many cases a mismatch between shooting/close seasons and breeding seasons...other countries interpret the welfare issues rather differently.
Hind. Yearling and calf, to shoot hind and calf and leave yearling. This situation would cause severe hardship and stress.
First 6 months of life but they are dependant on the mother for at least the first 12 months.
Some calves continue to suckle long after they need to. A competent stalker with knowledge of deer is best placed to advice on the dependency issue in respect of his ground.
Juveniles are able to cope if there is keep available and if their dam was in good condition during lactation.
The key issue is likely to be the number of days since birth and, given the spread of calving dates, it is impossible to fix one date on which the majority of juveniles can be said to be independent of their mothers.

# Summary of Responses to the DCS Consultation on Close Seasons March 2005

## Q3.7 Do juveniles require a close season?

### HEADLINES

**Q3.7 Do juveniles require a close season?**

**Young females misidentified as juveniles could have dependent young**

**Practitioners operating in the woodland more likely to say no than those on the open range**

### SUMMARY

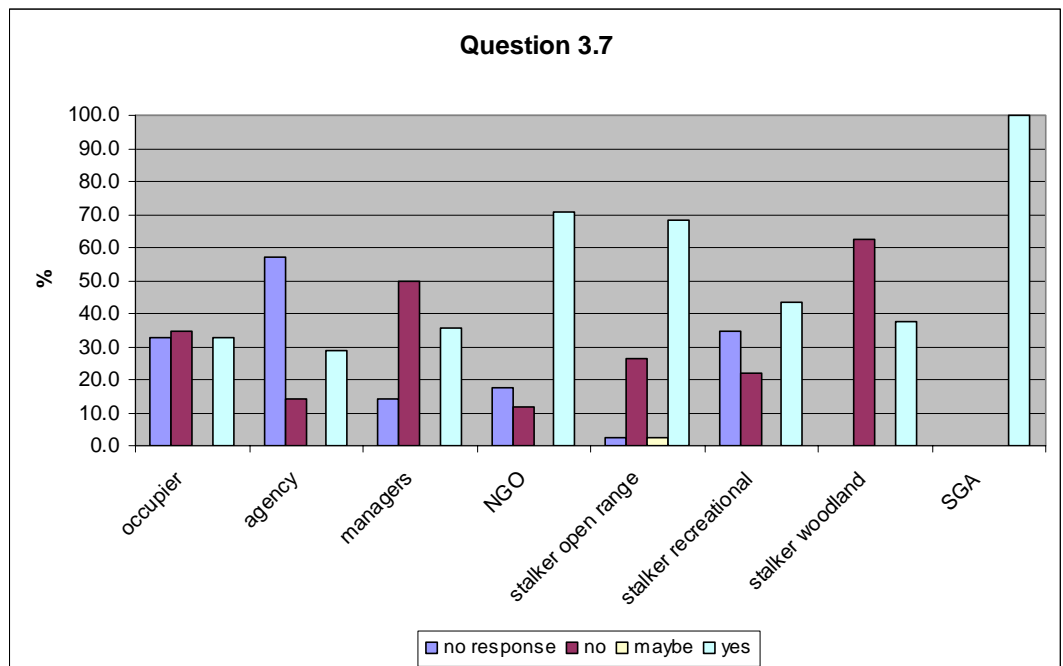
There was some confusion in that a number of responses stated that there should be a close season for juveniles because the hind season existed without further teasing out the arguments for or against.

A number of NGOs suggested that there should be a close seasons for juveniles at least until they were at foot. This would remove any possibility that misidentification could lead to young females being shot where they had a calf lying in cover.

The NGOs, who advocated earlier that there was no clear need for legal close seasons, did not believe that this should be any different for juveniles. There was a clear difference of opinion between those on the open range and those who stalked predominately in woodland with those in woodland more in favour of not having a close season for juveniles.

### By Categories

“Do juveniles require a close season?”



## Summary of Responses to the DCS Consultation on Close Seasons March 2005

### Range Of Statements

Females yes. Males, positively identified, no.
Yes except dependent juveniles.
A separate one to hinds not necessary.
I don't think juveniles require any close season.
Not for welfare reasons but for practical reasons it makes a lot of sense to link it to seasons for females.
Identified risk inherent in the identification of juvenile deer from adult females of the same deer species.
All juveniles should be regarded as adults after April of the year following birth.
Closed seasons for juveniles should be concurrent with the female seasons
Few stalkers have sufficient skill to judge the age of a yearling female with sufficient confidence to allow them to be shot during the period when older females usually have dependent young at foot.
Require a close season at least covering the period from birth to the point when they can run with their mother at all times.
Close season to protect the period between birth and the calf becoming strong enough to run with its mother.
Would like to think they could have 3-4 months of life before being culled.
Problem distinguishing female years olds from say some two years old or older.
If there is an issue in identifying sub-adult and young females, then no hinds or juveniles should be shot before July or August.
It is acceptable to take both juveniles and weakened animals but only in cases where the management of deer is for the protection of agricultural, forestry and natural heritage interest.
Advocates believe that it is ethically unacceptable to cull young animals when they have known hardly any life at all.

# Summary of Responses to the DCS Consultation on Close Seasons March 2005

## Q3.8 Do males require a close season?

### HEADLINES



### SUMMARY

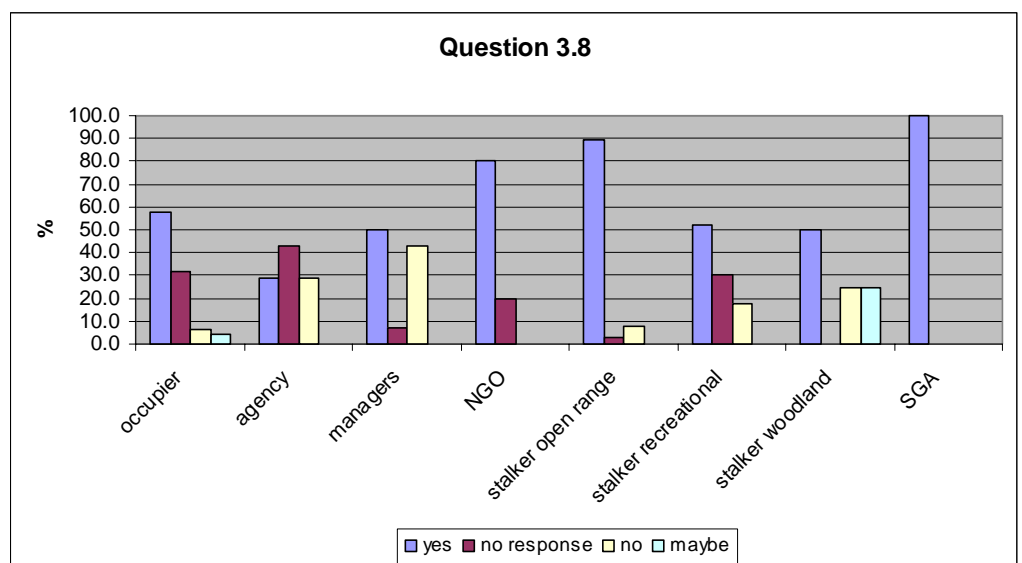
The majority of respondents advocated a close season for males. The impression from the responses was that this was based on the premise that open range red deer stags require protection after the rut because they are in poor condition and require access to undisturbed winter feeding and shelter. BDS exemplified this by their contention that protection is required only for upland red males but that being able to define upland and woodland would be impossible and therefore there was a need for a short winter season for red stags (and their hybrids).

BASC believed that red deer and roe deer males did require a season, citing post-rut welfare considerations for red deer and that the present dates should remain. For fallow deer and sika deer, BASC advocated that a change to the close season would increase the efficiency of control but there was a need for a close season to ensure that some recognition was given to the species as a sporting quarry rather than simply a pest.

SNH, FCS, NTS, RSPB, JMT and the RICS Scotland believed that there was no biological or welfare argument that required males to have a close season.

### By categories

“Do males require a close season?”



## Summary of Responses to the DCS Consultation on Close Seasons March 2005

### Range Of Statements

Morally a short close season is desirable.
Only for sporting considerations.
Allow recovery following the rut.
Males on different grounds vary; I do think they require a close season.
The sporting element is very important to the "image" of Scotland. It is part of the tourist industry, important as a revenue earner.
There is a requirement for a close season on stags in the Spring when they are under stress with food being short.
Stags are a commodity for sporting purposes and should have protection accordingly.
The current close season may help minimise competition for hill access between sporting use and hill walkers. The council therefore favours retention of the existing arrangement for red deer stags.
Disturbance from rifle shooting.
Greater flexibility should be given for shooting stags outside of season.
In the vast majority of circumstances, and particularly woodland, there could be no biological reason for not maintaining an open season throughout the year.
Under circumstances where there appears to be a need for strengthening stock, yes.
They should not be hunted all year round for welfare reasons.
There is no need for change to any of them. Personally I am sick and tired of people stating there are too many deer in Scotland. Who are these people that say so?
Stags Should be out of season from the end of October until a date in the summer when they have regained their energies from the winter. Licences are available for the culling of males over the winter.
Shooting obviously stresses male herds as much as female herds. Stags are an asset - value to estates, not vermin.
Where sport is the major management objective, managers may choose a voluntary, self-imposed, close season. It should not be imposed by law.
Does not believe there to be strong arguments, on biological or animal welfare grounds, to support a closed season for male deer, providing stalking carried out in accordance with Best Practice. We are satisfied with the current system.
Traditionally it has been considered that animals require a quiet time, but it can also be argued that predation is a year round phenomenon and animals are adapted top this situation. Moreover, male deer are, arguably, in poorer condition during the rut (when they can be shot) than they are in May/June after feeding on flushed vegetation (when they cannot be shot). Thus, in our view the current seasons do not appear to show any welfare logic for male deer and could be abandoned.
Open Hill red stag deer yes, Woodland deer no.
Keep to present practice.
Minimise disruption.
At the end of the season they are in such poor order, they should be left to try and recover for the winter.
Hill stags should therefore continue to be protected from November to June.
Regular disturbance through the late winter and early spring would be a welfare matter, as deer management would adversely impact on the recovery of those males not taken or killed. Taken matters in relation to "enclosed" and "open range" habitats into account. A single close season for all males should be established from 1st March to 30th April.
Closed season after the rut and during winter when they are at their poorest.
Should be of much shorter duration and take account of species related factors; example roe bucks cause tree/vegetation damage in Feb. / March.
We believe that existing measures could be made more transparent and easier to apply.
Males require a close season to ensure there is a balance between males and females.
Populations may be vulnerable to over killing of trophy males by sport shooters, and should therefore be given protection.
With the exception of the red deer stag, there is little welfare requirement for males requiring a close season. Rutted red stags require "mending" time during post rut, autumn and winter. There is less logic to close season for males of other species, but as licenses can already be granted for necessary out of season culling, there is no need to alter the current situation.
Biologically no, possibly as a mechanism to prevent over-exploitation.

## Summary of Responses to the DCS Consultation on Close Seasons March 2005

Good quality stags will die of malnutrition and exposure if chased around as a result of continuation of shooting in January and February.
For males there is little humane penalty incurred by having no statutory close season. Upland red stags do need a period of peace without continual harassment during late autumn and winter in order to regain their bodily condition and enable them to survive a harsh winter. Describing what constitutes an upland stag in accurate legal terms and distinguishing them from woodland stags is probably impossible. Most humane answer is to retain a short winter close season for all male red deer.
Welfare grounds, to minimise the disruption on stags post-rut.
On balance there are no moral reasons for having a short close season for males to settle and recover after the rut and economic reasons i.e. to conserve the stag population.
No closed season means longer open season, more potential for sporting guests, requiring more stags therefore more deer.
Otherwise unscrupulous stalkers may be tempted to overshoot on the more valuable trophy males, whilst ignoring females, the key to populations.
Not be shot on wintering ground i.e. after rutt.
Do not see any compelling reason for a compulsory close season for male deer, but recognise that in some situations, deer managers may wish to avoid culling at certain times of the year.
Immediately after the rut to ensure the long term welfare of those not killed. Could end at the end of February.
Only to prevent to prevent undue disturbance and exploitation.
The disturbance emanating from culling can be particularly unsettling for non-target males and can significantly reduce the feeding time available to them.

# Summary of Responses to the DCS Consultation on Close Seasons March 2005

## Q3.9 Should close seasons be based only on welfare or other considerations?

### HEADLINES

<p><b>Q3.9 Should close seasons be based only on welfare or other considerations?</b></p>	<p>When to kill deer should remain the responsibility of deer managers</p>
	<p>Cannot use seasons as means to manipulate populations</p>
	<p>Should use to protect venison quality</p>
	<p>Should be used to allow for better management of access and recreation</p>

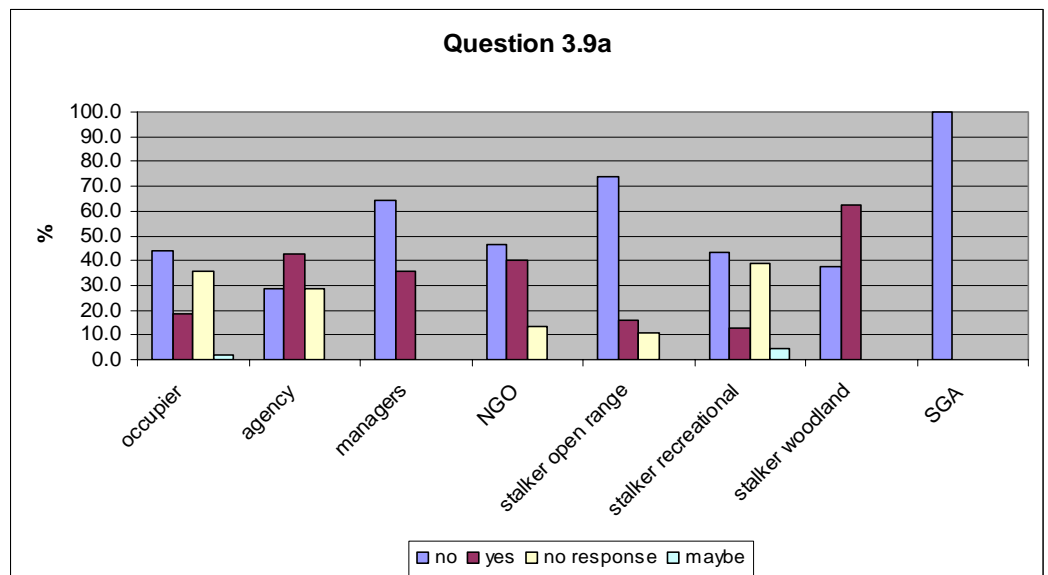
### SUMMARY

The majority of responses considered that close seasons should be based on other considerations other than welfare, albeit welfare was an important component and should not be compromised for the sake of advancing these other considerations. Venison, socio-economic and damage ranked the highest among the issues identified.

The agencies mainly took the view that the primary consideration should be welfare and that other issues were operational issues that were the responsibility of deer managers and should be directed by Best Practice Guidance. A number of the non-sporting NGOs took the same view believing that using close seasons as a means to manipulate populations was a mistake.

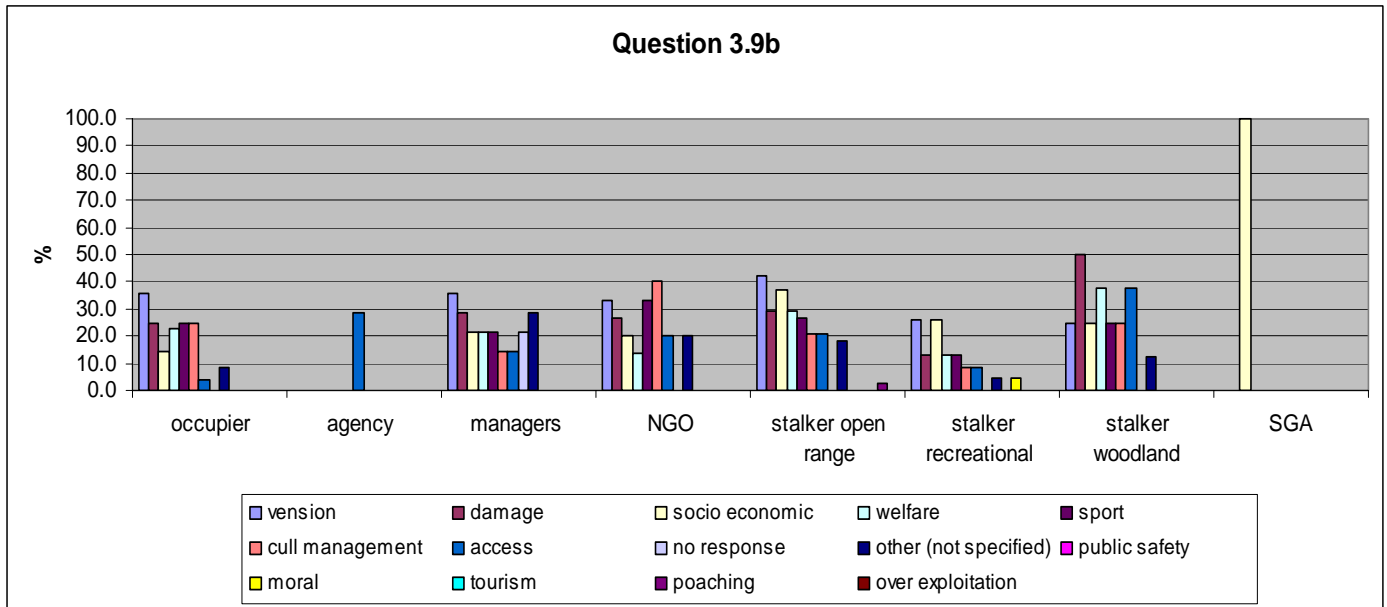
### By Categories

“Should seasons be based purely on welfare?”



## Summary of Responses to the DCS Consultation on Close Seasons March 2005

“.....should they also take account of other factors such as venison quality, sporting objectives, damage control, cull effectiveness, access or other issues?”



## Summary of Responses to the DCS Consultation on Close Seasons March 2005

### Range Of Statements

These factors can be taken into account by land managers developing policy.
Hinds, the season should be advanced to help the cull.
Few finer sporting experiences than stalking red deer stags during the rut. Hind cull reserves venison quality.
We are of the opinion that the current system achieves this to a suitable degree.
"If it ain't broke don't change it"
Based only on welfare.
Up to the individual manager to decide if he were managing for other factors such as venison quality.
Population control.
Venison quality should be considered.
With no close season for stags then the sporting objectives would be damaged, stags being almost classed as vermin. This would undermine a well managed sporting estate in its efforts to make ends meet.
Strictly on welfare considerations, it is the responsibilities of managers to take account of the other issues listed here in deciding whether to kill deer or not.
The use of close seasons for population management is a mistake. Population management should be carried out through the assessment of deer population and impacts on other interests including the natural heritage.
For SGD/PA venison quality holds a huge importance. Any close season should be therefore linked to the poorest health period for all species.
Venison from stags during the current close season should not be permitted to go on human food chain and avoid compromise of quality venison.
Close season exists to protect the species from over exploitation and cruelty. Consideration should be given to bringing forward the hind open season to the beginning of October. Such a move would help sporting objectives and venison quality. Further opportunity to achieve cull targets within the existing period when the public are aware that intensive culling work is being carried out on the hills.
Industry should self regulate to reflect requirements locally through DMG.
Stag venison in October is usually or poor quality. Extending the season may give a more consistent supply but a very variable quality
Any changes to the current close season should consider how recreation users could find out about when and where stalking is taking place, and include this as a revision in the outdoor access code.
The seasons as they stand are as appropriate as is necessary, allowing stags in prime condition to be shot. As far as damage control is concerned, the existing system, led by DCS, is working, and will certainly be improved after the experiences of 2004.
Enabling as wide a season as possible out with that where there is judged to be significant welfare considerations, will enable deer managers greater flexibility to achieve a diversity of land use objectives.
Seasons should be largely based on welfare issues. Out of season licensing will allow for the few times when human interest takes priority over deer welfare.
The carcass supplies meat for human consumption so the quality should be taken into consideration. Best condition and prime market time for hinds is Oct/Nov/Dec. Stags improve after rut and season could be extended.
Would have reservation shooting stags and bucks in velvet.
Two tier marketing for venison. keep mature stags, run stags and old and poor for the dog meat market so that can promote a premium market
The close season is one of the most direct tools for looking after deer welfare.
Control of shooting is required to prevent the over-exploitation of a shared natural resource e.g. where over culling of mature stags on their wintering ground could cause an economic collapse of the local deer management industry. Deer welfare should certainly not be legally compromised because humans find it inconvenient to kill deer at a certain other times of year or merely because the market for or venison quality is better at that time.
Extending the open seasons would indeed increase the period during which deer management and public access could come into conflict and in some circumstances would be an additional constraint on responsible access. Process of educating and informing visitors initiated over time, reduce the likelihood of conflict.
Red stags are shot in the rut when venison quality is at its poorest. For hill deer it should be noted that there are far more welfare concerns for a hind shot in October, and the calf not got, than shooting a pregnant hind after the current close season and before she has calved.
Due to level of demand form the market there is very little advantage in shooting stags after the 20 October.
If deer can't be shot within the season more stalkers should be put on the ground during the season to obtain cull.
Issues such as venison quality, sporting objectives, etc are operational issues which should be left to the discretion of the deer manager and can be dealt with under Best Practice Guidance.

## Summary of Responses to the DCS Consultation on Close Seasons March 2005

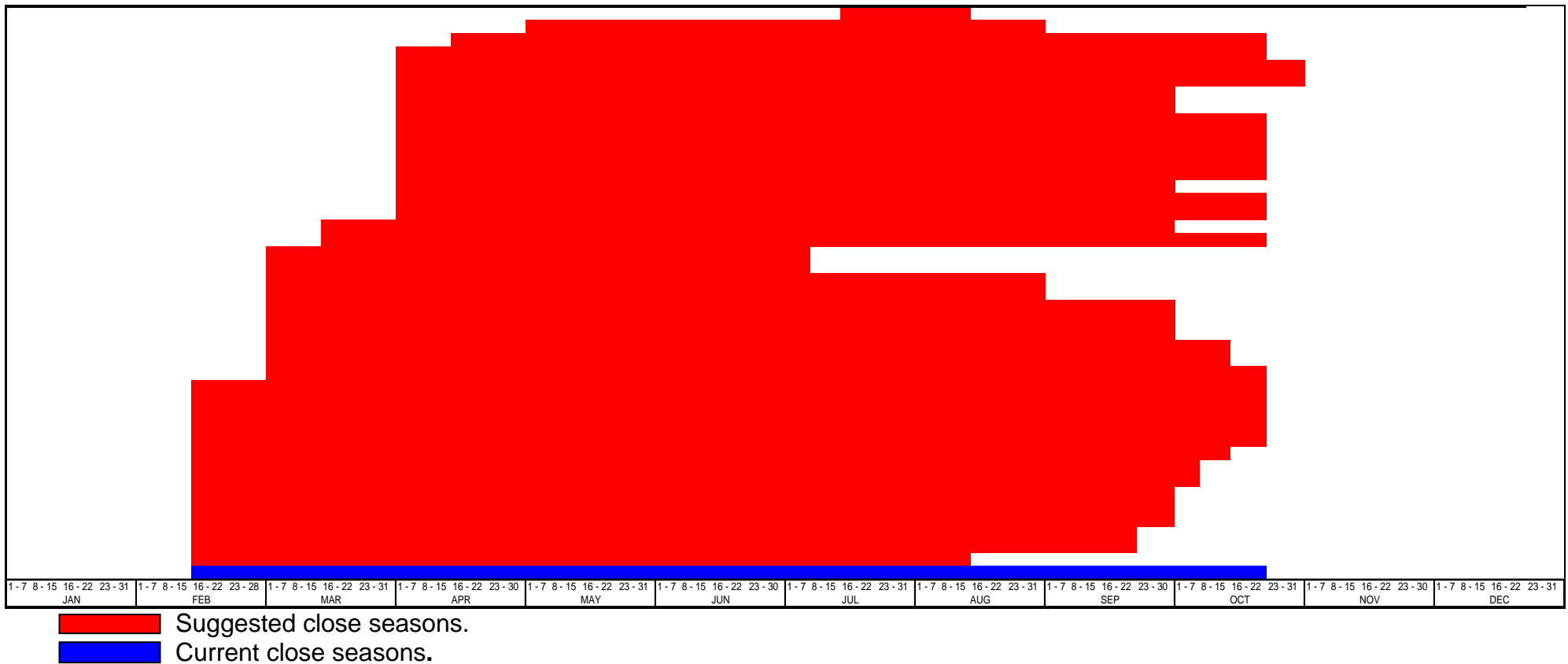
### Q3.10 What close season dates should be set for all four species of wild deer in Scotland, split by sex?

#### SUMMARY

The majority of respondents advocated the status quo. There were very few respondents that therefore put dates forward.

The diagrams below highlight the close season dates put forward by the respondents, each line representing an individual response.

#### Red Female



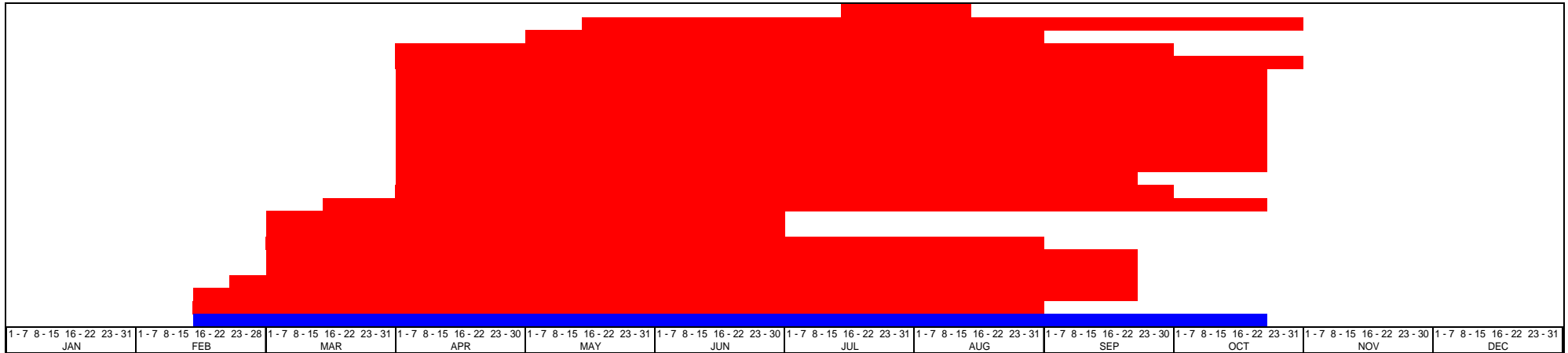
## Summary of Responses to the DCS Consultation on Close Seasons March 2005

### Roe Female



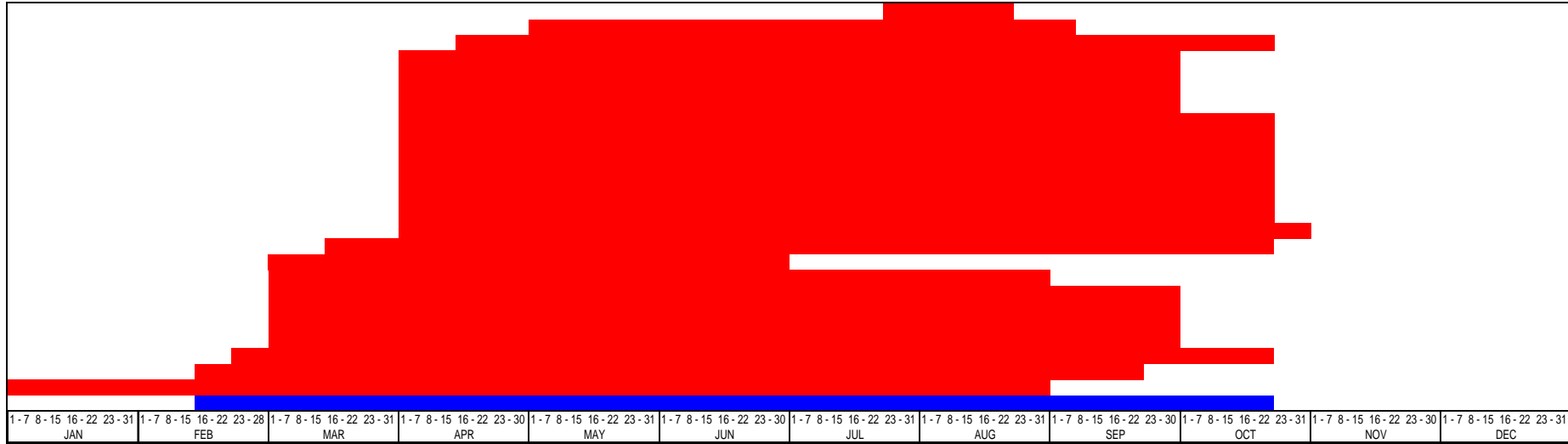
Suggested close seasons.  
 Current close seasons.

### Fallow Female



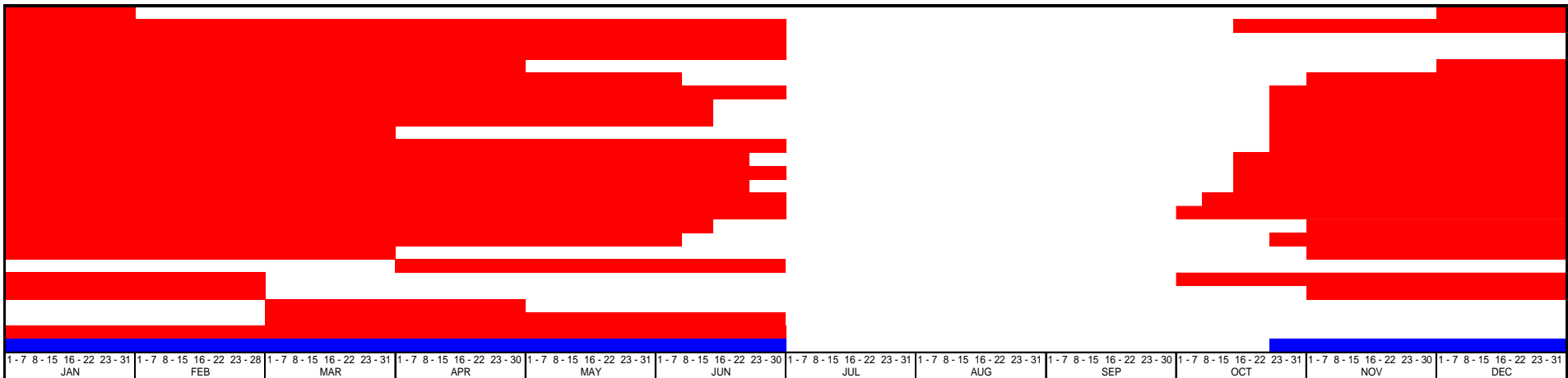
## Summary of Responses to the DCS Consultation on Close Seasons March 2005

### Sika Female



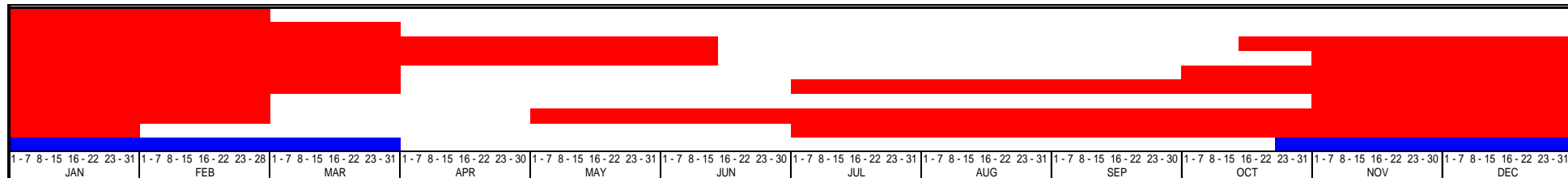
Suggested close seasons.  
 Current close seasons.

### Red Male



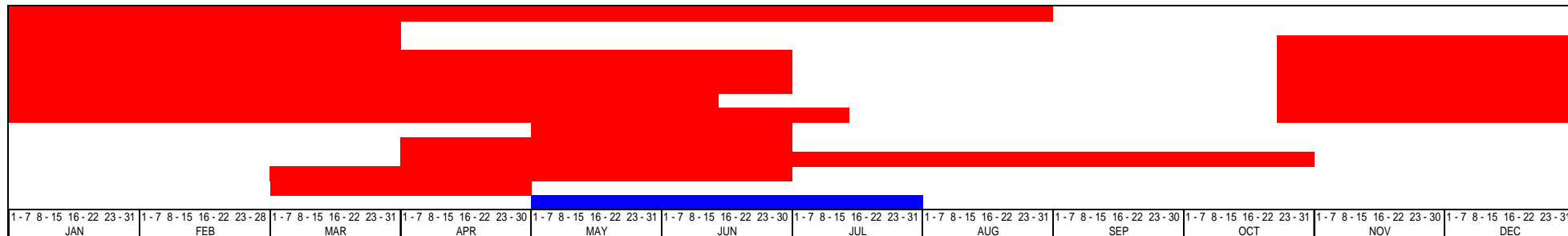
## Summary of Responses to the DCS Consultation on Close Seasons March 2005

### Roe Male

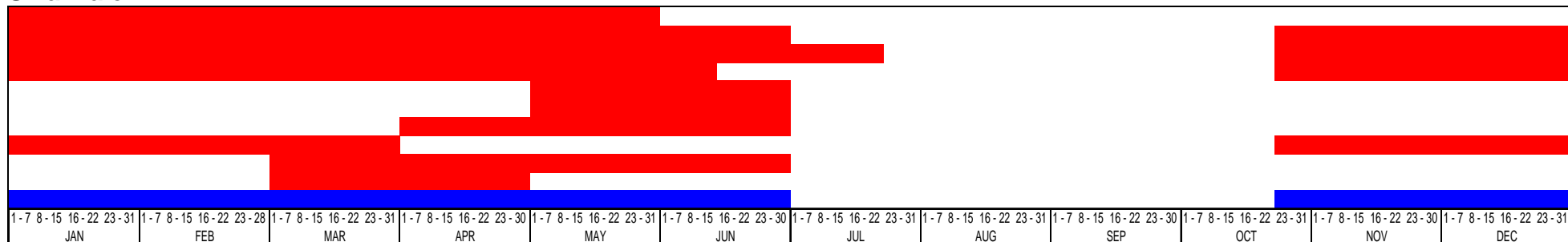


Suggested close seasons.  
 Current close seasons.

### Fallow Male



### Sika Male



## Summary of Responses to the DCS Consultation on Close Seasons March 2005

### Range Of Statements

Having no close season for males allows damage control without having out of season licences i.e. reduces/eliminates paperwork. Also allows estate's potential to raise more revenue from stags if wished. Extended female season allows population control to be carried out in season and again, does away with paperwork and takes away the stigma. Extending from 5th Feb. to 1st April minimises the welfare issue.
<u>Red deer: Male</u> - Simple, well understood. Allows stags to be killed when they are in the best possible condition for either meat or trophy. Protects land owners interest by not permitting excessive culling when stags are on wintering grounds. Achieves good balance between access and off take. <u>Female</u> - As present, simple, well understood. Protects hinds during late pregnancy and early lactation. Protects dependent calves. <u>Roe Deer: Males</u> - Changed to acknowledge lack of any moral, welfare or management reason why bucks should not be shot during the winter.
As now but stags till end of Oct.
No change from present.
Dates to vary; species, sex & region. As is at present.
Red Deer hinds with calves should remain October to end February, without calves from September to end February. Varying the start of each season in these ways can be achieved in the same ways as the compromise; the open season for all hinds might be brought forward by two weeks.
If deer are suffering from disease and starvation current legislation or authorisation from DCS already exist to cover this.
Calf seasons could extend beyond the hind and doe season.
Why rethink close seasons if the deer cycles etc are unchanged and close season status quo is acceptable and logical.
There should be no close season for any male deer in Scotland, the close season for all female deer, of all species, should be April - August.
Scope to harmonise the red, sika and fallow seasons.
Status quo.
Harmonise the red, sika and fallow seasons.
If people need an extension then go back into June when the stag and venison is at its best. Maybe Sika should be more in line with roe than red.
There is a need to professionalize deer management for all species and habitats, giving managers the freedom, within strict codes of practice and competency rules, to manage their deer populations according to that local need. This, when coupled to the proper use of the DMG concept, should mean that local deer populations can be managed at local level to the advantage of all with a legitimate interest while ensuring a reasonable degree of protection against rogue practitioners.
The rut is getting later as a result of climate change and it would be useful to extend the season a little. Stags often come down to agricultural land in June and it would be useful to be able to shoot them at that time in an open season.
If deer were not protected they would be seen as venison and stalking and husbandry would suffer resulting in a major downturn.
The trust believes that there should be no statutory close seasons for any deer and that reliance should be on welfare legislation to prevent suffering of animals.
The general thought of our membership is that there is no need for a change in the present close seasons as it would lead to uncertainty.
No requirement to change them. A great deal of time and thought obviously went into setting these dates. Ending the open season for stags would be less poor quality stag venison going onto the market and more chance to shoot hinds before their meat deteriorates.
The present seasons were long enough and that the only suggestions to vary the dates were in fact to shorten the period. However as individual Estates, if this is their reference, can voluntarily shorten their own seasons, the existing arrangements and dates are perfectly satisfactory.
No experience of other species, for Red minimum justifiable close season.
Any culling within closed seasons, including culling by occupiers of agricultural or forestry land should be carried out under a DCS auth. In terms of the 1996 Act. Suggestion that fitness and competence could be established in conjunction with the FAC application procedure is adopted the authorisation process would be simplified.

### Summary of Responses to the DCS Consultation on Close Seasons March 2005

We do feel that when deer are killed out of season, the carcasses should not be sold for human consumption. To provide good quality venison for the end user in accordance with Best Practice, then we should not allow carcasses that may be unfit for human consumption to go into the food chain.

All trying to improve the quality of venison going on the market and there are far too many badly run stags being shot at the end of the season. The big problem is where people are either trying to grow trees in the middle of deer country without protection or improving grasslands which in both cases is simply helping to make ideal habitats for deer. Shooting these unwelcome deer does not provide an answer to the problem as it merely creates a vacuum and draws numbers of deer in from neighbouring properties to the extreme detriment of those properties.

Early date for the end of the close season. Red females say 30th Sept.

No reason why hinds should not be culled as of 1<sup>st</sup> October

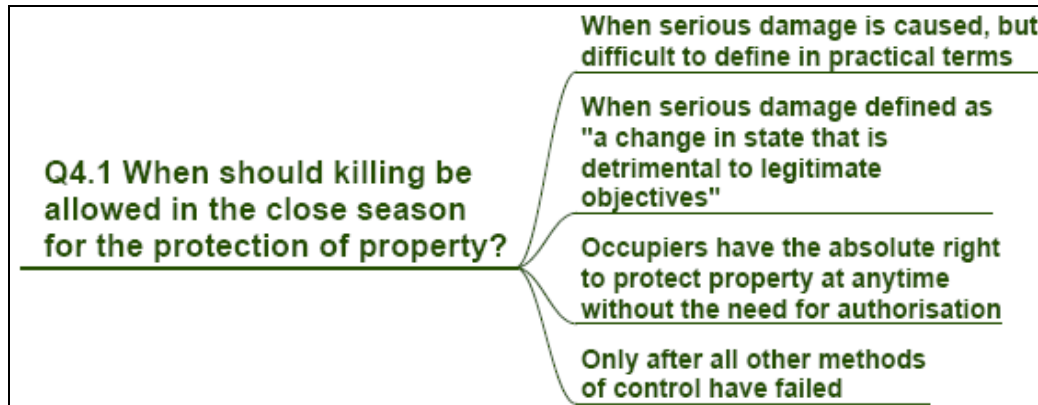
No necessity to change the current close seasons to red deer on open hill. Majority of landowners and land managers find that they can carry out their annual cull within the current open seasons.

Clearly raises issues about the potential for juveniles to be orphaned in the autumn and it increases the profile of the issue of shooting heavily pregnant females. The ability to shoot during an extended season must be tempered by an awareness of the issues this might raise; it should be governed by Best Practice Guidance and should be exercised in a way which recognises the duty of care referred to earlier.

## Summary of Responses to the DCS Consultation on Close Seasons March 2005

### Q4.1 When should killing be allowed in the close season for the protection of property?

#### Headlines



#### SUMMARY

The numeric majority of respondents sought the status quo with regard occupiers right to protect their property. However these same respondents included the need for the action to be authorised through DCS. This would imply that they sought a tightening of the current legislation.

A number of NGOs considered that the occupier should have the absolute right to protect property from damage by deer and the onus of proof that the action was not reasonable should rest with DCS. SRPBA and ADMG also considered that there should be an absolute right to protect property but that this should be through authorisation by DCS who would test for welfare issues.

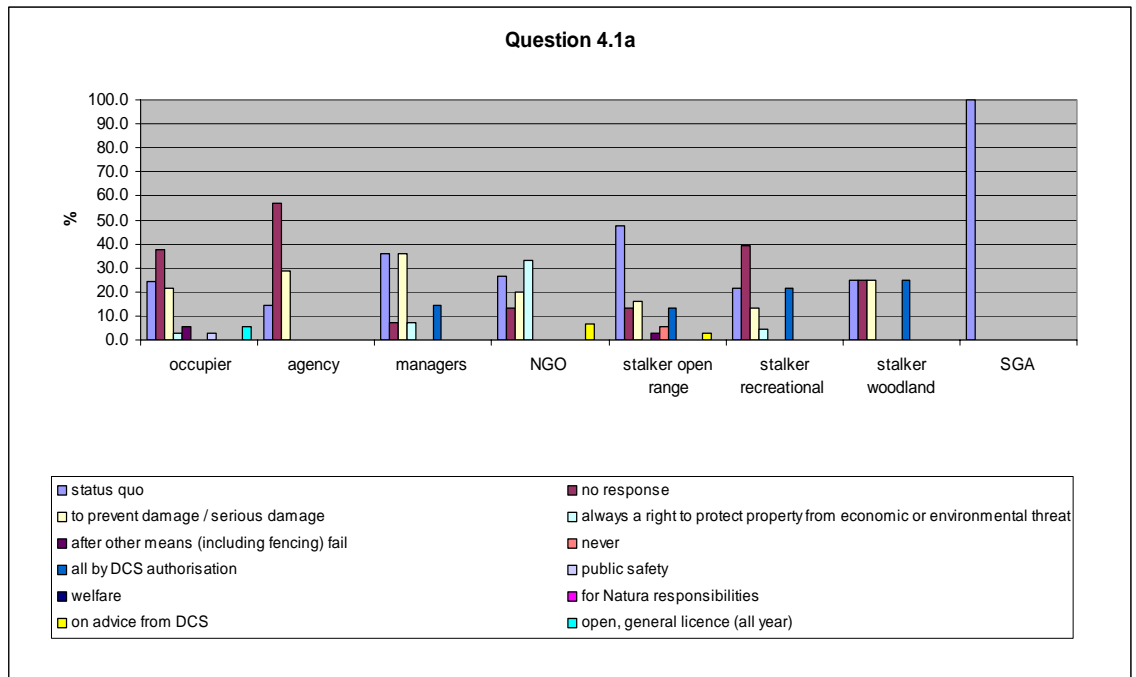
A number of respondents wanted to means test cases to show that serious damage was or was likely to occur and that all other reasonable means had failed. FCS highlighted what a number of organisations responded with, in that it is almost impossible to define serious damage or the likely threat of serious damage in robust enough a manner. RSPB put forward support for the definition '*a change in state that is regarded as detrimental to legitimate objectives*'. They did however look for means testing by DCS and that authorisations should be the exception not the norm.

BDS and BASC did not support the legal advice provided to DCS with regard the potential for deer to be considered as property under human rights legislation. BDS supported a strong authorisation process where DCS would be required to means test applications. BASC believed that occupiers should be able to protect property where there was reasonable cause and damage is serious. Further, that this should not be means tested, but the owner should be able to provide evidence of both scale and extent of the damage if challenged.

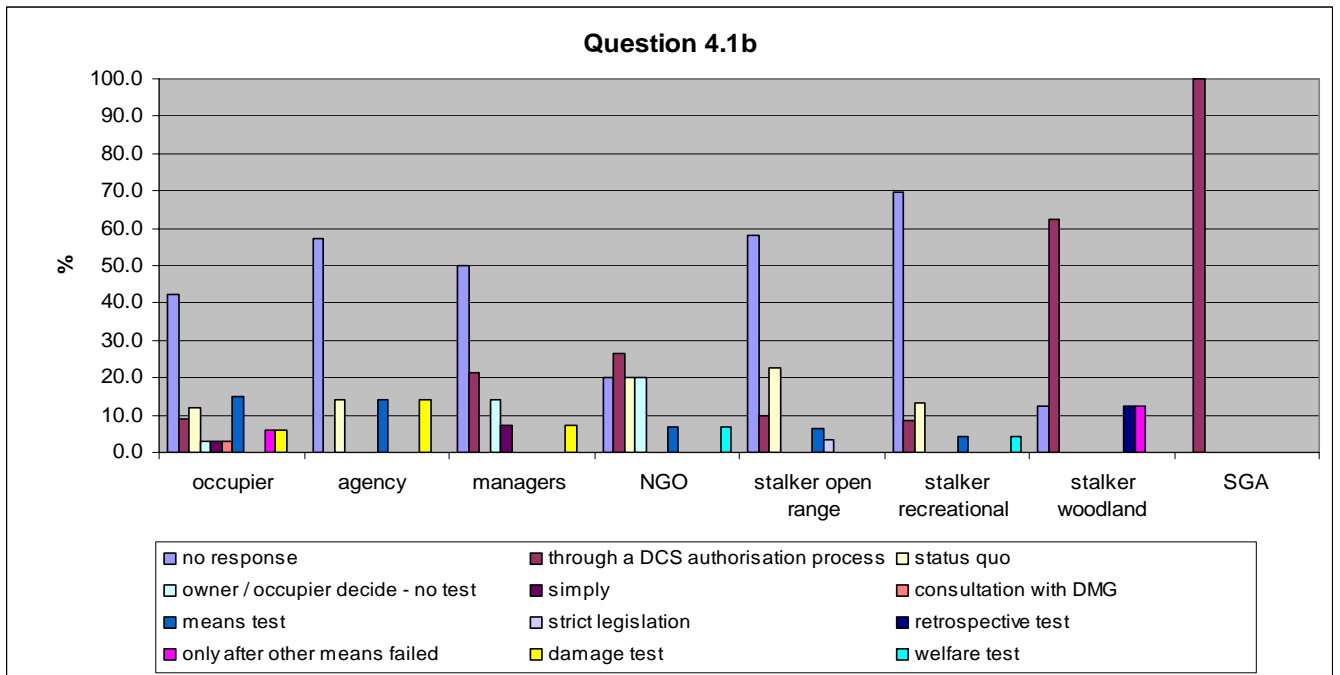
# Summary of Responses to the DCS Consultation on Close Seasons March 2005

## By Categories

“When should the protection of property allow the taking or killing of deer once a close season has been set?”



“and how should this be tested?”



## Summary of Responses to the DCS Consultation on Close Seasons March 2005

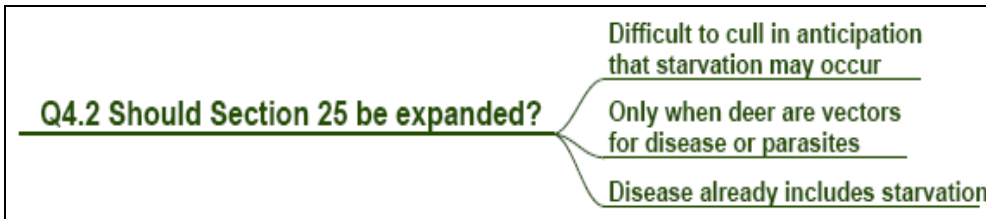
### Range Of Statements

After all proper means of control management have failed.
Damage can be proved.
Rely solely with the owner/occupier and be on the grounds of damage to crops and the threat of public safety. Should not be enforced on an owner/occupier.
Protection depends on extent of damage.
Such authorisation should be available in retrospect, considering that action may need to be taken immediately.
The owner of the property should have good reason to suspect that damage is being caused and the DCS should follow this up to ascertain the scale.
It is a case by case scenario but an occupier must be able to protect their property and livelihood without a close season.
There is no question that land owners should be able to protect their property from damage caused by deer. Deer should be shot immediately if they threaten a vulnerable crop.
Authorised by DCS based on evidence of where damage occurs. Definition currently used by DCS "a change in state that is regarded as detrimental to legitimate objectives" should be used in context. It would then be for the applicant for shooting in the close season to provide evidence that legitimate land management objectives are being harmed by deer browsing.
Any effective authorisation system will require rapid, non bureaucratic response.
Would act as a check on unfettered killing based on existing occupier rules without authorisation.
The main test must be for economic damage and deer control should be allowed to prevent this.
Any new venture on deer habitat should be fenced.
Farmers should continue to have authority to shoot deer at any time of year where such pest control is required.
The only arguments for retaining close seasons are ones of animal welfare. Exemptions could therefore be granted provided welfare could be protected satisfactorily.
Deer should not be shot during close season this should give adequate time to reach cull numbers and there would be no need for authorisations at all.
The practice of planting root crops adjacent to deer forests is constructive poaching.
Should have nothing to do with it if land is property managed.
Actual (and not potential risk) of damage to the natural heritage interest, actual economic damage to commercial forestry, agriculture (demonstrated to be economically significant).
The present rules are satisfactory and no means- testing of damage could adequately provide a workable measure.
Not just the legal protection of property rights needs to be considered but also loss of investment and annual cash support that will follow from the removal of rights. The economic, environmental and social impact of the removal of rights to control damage could be considerable. Criteria and a procedure could be laid down (a standard), practitioners that wanted access to the facility were assessed well in advance and time limited close season licence to practice issued.
The carcass should not be offered for sale.
Same principle & criteria that are applied to the control of seals, mergansers and raptors.
Where the treat or danger is not immediate, out of season authorisation to cull should be required. Authorisation should only be issued if this is co-ordinated with neighbours or the deer management group and it is clear by consensus this is the best way of resolving the problem encountered.
Deer are considered vermin by some section of the forestry and farming ventures in Scotland. Now perhaps have to re-address this situation.
Owners/Occupiers of improved agricultural land should have the right to kill deer at any time to protect crops (including grass).
The protection of property argument can and will only ever be resolved when there is a strict definition of serious damage included in the act.
The onuses of proof that the occupier is not acting reasonably in regards to control should rest with the prosecuting authority and not the occupier.
Act should be amended to make it clear that the test must be applied rigorously with onus being on the person who wishes to kill deer to demonstrate that no effective non-lethal means of control is available.

## Summary of Responses to the DCS Consultation on Close Seasons March 2005

### Q4.2 Should Section 25 be expanded?

#### HEADLINES



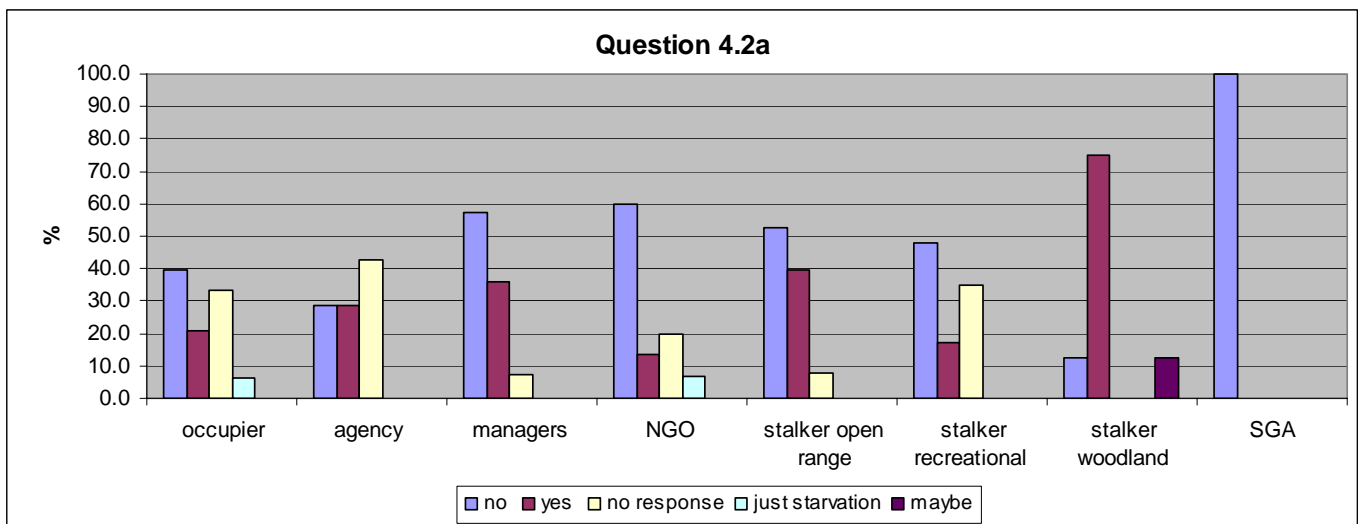
#### SUMMARY

Numerically the majority of respondents saw no need to change section 25. Those that did respond to this question appeared to be mainly concerned with open range red deer.

FCS, SNH and RSPB, NTS and JMT were more supportive of a change where not taking action in certain circumstances would lead to greater welfare concerns. A number of organisations felt that there was little difference between disease and starvation while others felt that it would be difficult to define starvation in a meaningful manner and that the section would not be applied in wider circumstances.

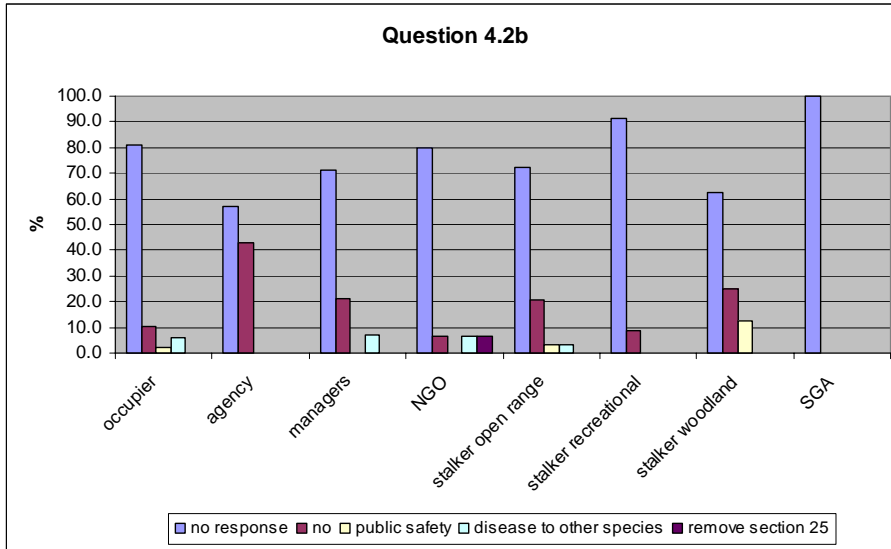
#### By Categories

“Do you agree that Section 25 of the Deer (Scotland) Act 1996 should be expanded in terms of deer welfare to include disease and starvation?”



## Summary of Responses to the DCS Consultation on Close Seasons March 2005

“Do you have any you would wish to add?”



## Summary of Responses to the DCS Consultation on Close Seasons March 2005

### Range Of Statements

With the exceptions already under section 25 it is relatively easy to verify any justification to cull by examination of carcasses. This verification becomes more difficult if the exceptions extend to culling healthy deer in anticipation of disease or starvation. Incumbent on the person culling the deer to justify good reason for the cull?
I can see some boards using the excuse to cull deer when they have not considered fully the implications of their actions.
A case of foot and mouth (or TB) disease, when a special order in council could be applied.
When considering starvation it should be clear that it has been caused or exacerbated through prior acts of human intervention.
Without greater access by deer to traditional feeding areas when weather conditions are hard I would not wish to see starvation used as an excuse to cull.
A more difficult situation would be extreme weather caused by a massive decline in the condition of deer; a mechanism for deciding upon culling due to impending starvation needs to be in place, otherwise supplementary feeding?
This may be necessary for disease, for example, to control Louping Ill disease on a grouse moor.
Starvation is extremely difficult to define, given that starvation and disease are often inseparable as welfare issues. Whenever land is excluded from the deer range, we believe there should be a requirement that appropriate deer management plans are prepared.
All out of season culls must be authorised by DCS.
Reducing disease and starvation by reducing the number of deer so that there is sufficient food. Re-introduction of deer hounds would help this process as you would be able to account for the 15% of wounded deer currently not accounted for.
Deer managers have a moral duty of care; supplementary winter feeding must be made available.
It is right that a deer suffering from disease, starvation or injury in the judgement of a fit and competent person should legally be able to be culled in the interests of its own welfare at any time and without delay, as is current practice. A retrospective authorisation process or at least recording mechanism is desirable in these circumstances.
Any deer suffering from disease, starvation or injury in the judgement of a fit and competent person, should be legally be able to be culled in the interests of its own welfare, at any time and without delay as in current practice. We feel that a retrospective authorisation process would be desirable in these circumstances.
A reasonable expectation clause could be added to section 25.
There are few acceptable reasons to deliberately allow deer to starve to death.
Any exception to the prohibition on killing deer during the close season must be carefully worded to ensure that it remains an exception rather than becoming the norm.

# Summary of Responses to the DCS Consultation on Close Seasons March 2005

## Q4.3 Should killing during the close season be allowed in the interests of public safety?

### HEADLINES

<p><b>Q4.3 Should killing during the close season be allowed in the interests of public safety?</b></p>	<p>Only after all other methods have failed</p>
	<p>Present definition is not a constraint</p>
	<p>Should be possible to avoid the need, by culling in season</p>

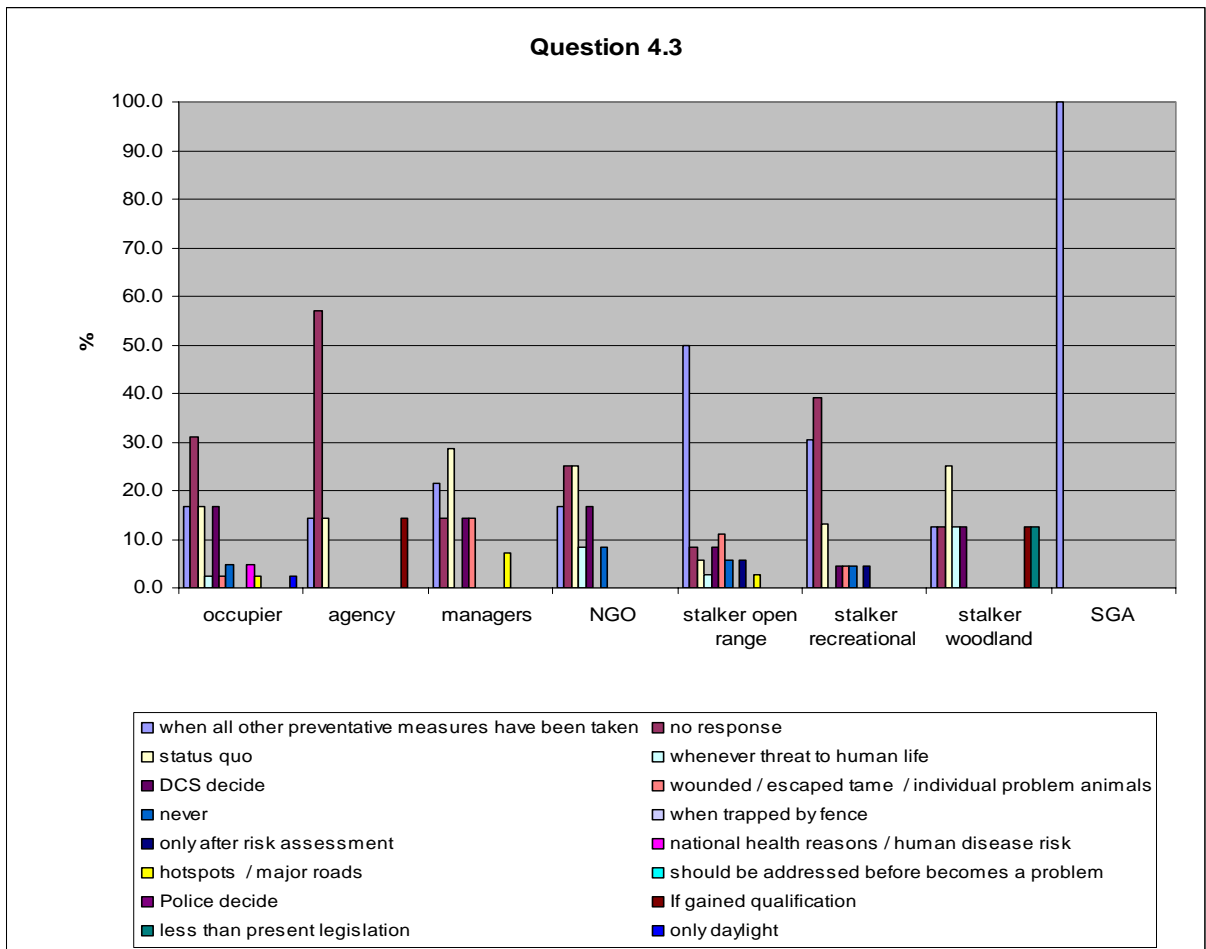
### SUMMARY

The majority of responses supported the status quo. There was slight disagreement between a number of respondents as to whether ‘in the interest of public safety’ should be further defined but a number of NGOs supported the present definition used by DCS.

A number of NGOs supported the taking of deer in the interest of public safety but only when all other reasonable mitigation measures had failed. BDS advocated that the action should be taken generally through the authorisation process but that the law should allow for retrospective authorisations in exceptional circumstances.

### By Categories

“In the interests of public safety, when might deer be taken or killed in the close season?”



## Summary of Responses to the DCS Consultation on Close Seasons March 2005

### Range Of Statements

If public safety in this context could be suitably defined and incorporated into the act this may resolve the need to list a number of different circumstances in which control measures may legitimately be taken.
Only in daylight hours.
If the deer were culled according to the general targets there would probably be no reason to cull during the close.
When a serious threat to human life.
Where there is a contingent of deer in a public place, there might be a reason to cull at any time of the year in the interest of public safety.
We do not believe that current legislation is a constraint to the effective control of deer on roads and feel that the Deer (Scotland) Act 1996 gives adequate scope for authorisations to cull deer during the close season to protect the safety of the public.
Present legislation seems adequate and to work well.
Only to reduce risk of RTA when all other methods have failed.
Less of a safety issue on single-track roads used only by local inhabitants etc.
Keep it simple and flexible and leave well alone.
At all times by suitably qualified people. Public safety must be the priority.
When all other options have been tried and failed.
Above that which might be reasonably expected.
DCS intervention
DCS intervention
Culling to protect public safety in general should be permitted on all occasions provided the route cause is also subject to mandatory control.
What we must avoid is uncontrolled and unregulated public culling of deer out of season.
Less likely to be an issue if close season dates are constrained only to periods when deer welfare may be compromised, but taking of deer within a close season may still be appropriate where there are concerns over public safety.
When all other preventative measures have been taken, such as fencing, signs etc.
Public safety could occasionally be threatened by a wounded stag or an escaped tame stag. Perhaps it should be recommended that those stag those with a right to roam carry a heavy stick
The law could easily allow evidence of severe and immediate nature of risk to be offered by the perpetrator to avoid any subsequent prosecution. Before formal DCS authority could be obtained even by telephone.
In USA wild animal carnage seems to be an accepted way of life.
Fencing, rumble strips etc. may work to prevent RTAs however consideration must be given to cost.
Define: what is public safety
Hard (intense) culling of beasts can result in them taking refuge near road and causing accidents.
Probably not much to be gained by trying to define more precisely the meaning of public safety within the terms of the Deer Act.

# Summary of Responses to the DCS Consultation on Close Seasons March 2005

## Q4.4 Should killing during the close season be allowed to protect natural heritage?

### HEADLINES

<p><b>Q4.4 Should killing during the close season be allowed to protect natural heritage?</b></p>	<p>Is a need for tighter definition of natural heritage</p>
	<p>Only when all other methods have failed</p>
	<p>A need for more efficient in-season culling</p>

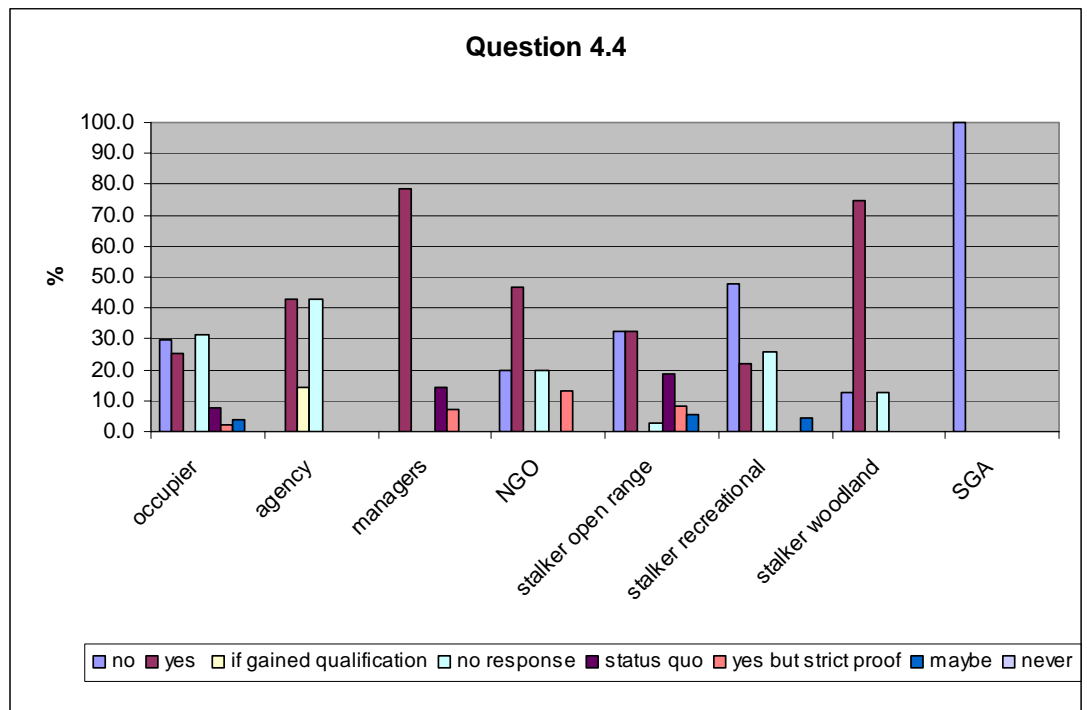
### SUMMARY

The majority of respondents supported the status quo. Most of the sporting NGOs while acknowledging the need to protect the natural heritage, felt that the evidence required to issue authorisations needed to be stricter and that all other measures would need to be shown to have failed, pointedly commenting that deer were an integral part of the natural heritage in their own right.

SRPBA felt that deer management should not take place on a reactionary basis and that by allowing close shooting season shooting (particularly with severely shortened close seasons) would be admitting that deer control for the environment had failed. SRPBA advocated the requirement for well worked up management plan that would facilitate more effective open season culling.

### By Categories

“To protect the natural heritage, should the taking or killing of deer be allowed once a close season has been set?”



## Summary of Responses to the DCS Consultation on Close Seasons March 2005

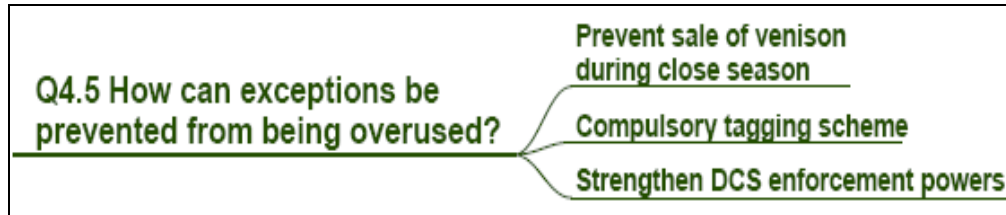
### Range Of Statements

Not unless a clear definition of natural heritage can be agreed, no other method such as electric fencing works. No night shooting should be allowed
Yes, methods i.e. fencing of gas guns shouldn't be culled in every instance.
Should be part of a proper plan.
Link to priority site process.
Impact of their damage is questionable.
Deer are our natural heritage. I have concerns over what could be described as "natural heritage". There seems to me to be an over emphasis on the protection of conveniently developed woodlands.
Only as a last resort and all other methods of control have failed.
After the Glen Feshie debacle it only proves these bodies and I include DCS have NO concept of what Scotland's natural heritage is. How can Scotland's deer herd remain sustainable when slaughtered indiscriminately out of season when there are no fences to protect the trees.
No, only in exceptional circumstances – most problems can be foreseen and culling in season planned accordingly.
Only where certain conditions are adhered to or fulfilled.
Keep it simple, flexible and as it is, it works.
Measured scientific advice within a wider management plan.
Not based on the dubious and sometimes spurious claims made by forestry interests and sometimes supported without evidence by SNH and Deer Commission for Scotland. To change the law would be a charter for the ignorant and the idle.
Authorising the taking or killing of deer in the interests of natural heritage once a close season has been established would be effectively admitting that deer control for the environment has failed. No need for authorisations to meet environmental objectives if Best Practice and voluntary codes of practice are correctly observed. In order for this to work in practice deer management plans will need to become more sophisticated.
Not without fencing. Consideration must be given to the deer's wintering needs. Is deer part of the natural heritage?
Less likely to be an issue if close season dates are constrained only to periods when deer welfare may be compromised, but taking of deer within a close season subject to codes of practice which minimise risks to deer welfare, could still be appropriate where preventing damage to the natural heritage is a high priority.
Only under exceptional circumstances.
Sika in areas where hybridisation is likely.
Not necessary if the season used correctly and vulnerable natural heritage areas correctly protected.
Should be exception rather than the rule, adequate control of numbers in season if necessary in collaboration with neighbours on whose ground the animals reside in season, should be able to control the problem without recourse to out of season shooting.
DMG deer within the group should be at a level that does not damage the natural heritage if a problem arises more effort should be made during the next open season.
Wild deer are part of the natural heritage. Being wild they have freedom of movement, which might mean that they are in the wrong place at the wrong time. The question arises as to what is natural.
Preferable that routinely managed in season to achieve specified natural heritage objectives especially whenever those objectives are drawn up to achieve an enhancement rather than maintenance of the status quo.
Demonstrate the need for culling in terms of an approved DMP.
Require an applicant to demonstrate the need for culling in terms of an approved DMP.
Only exceptional circumstances and providing animal welfare is not compromised.
Generally no, although there may be special circumstances where deer may have to be killed under license as is currently provided for.
Deer Management Group would have to address reasons before following season, possibly even paying costs to cover damage incurred.
Where heavy culling causes a vacuum, compensation should be available for affected neighbours.
Exceptional circumstances.
Any Natural Heritage considerations or damage caused by stags during the winter can be addend by authorisations which should
Protection of natural heritage does not hold the same urgency as dealing with deer on the grounds of public safety.

# Summary of Responses to the DCS Consultation on Close Seasons March 2005

## Q4.5 How can exceptions be prevented from being overused?

### HEADLINES



### SUMMARY

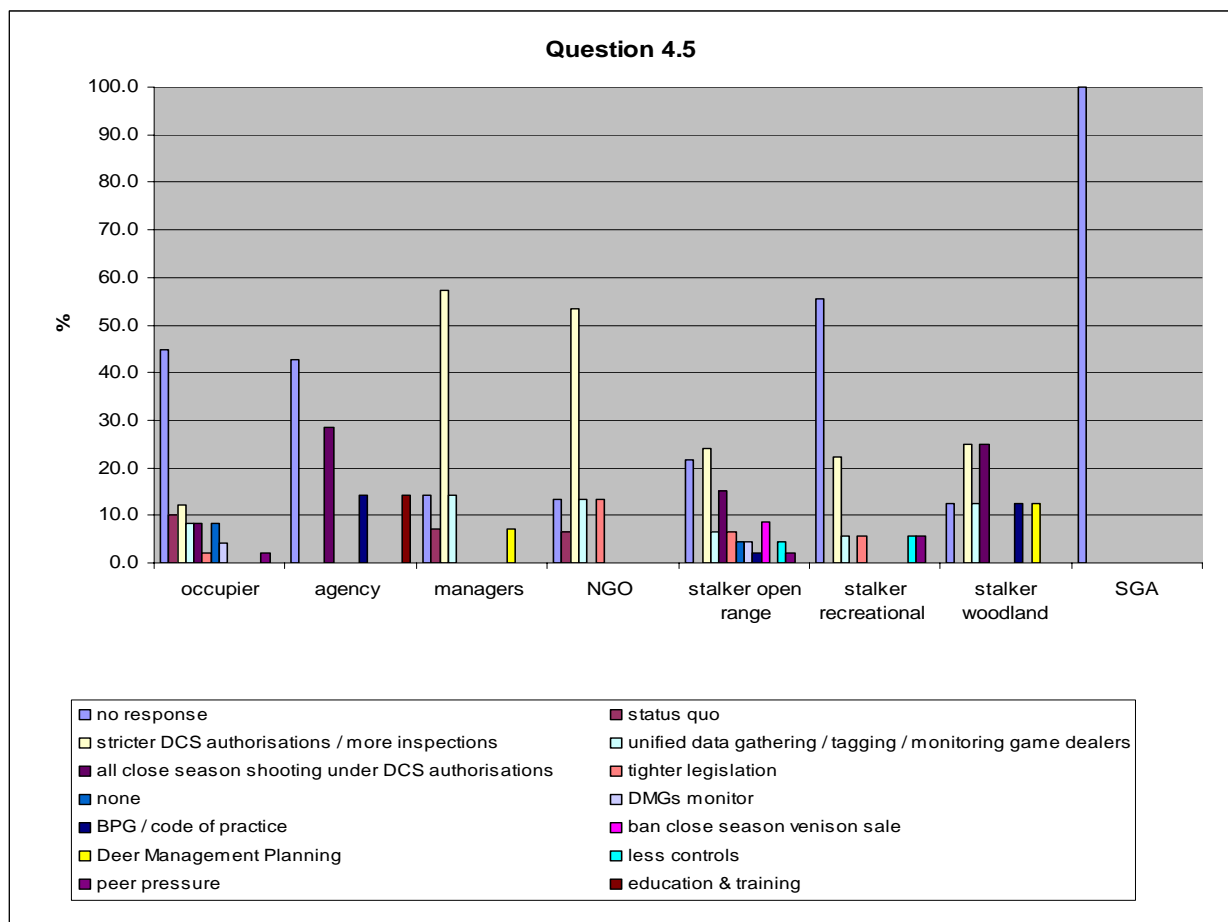
Greater DCS enforcement with recourse to legal action and the development of Best Practice were the main methods described. LANTRA highlighted the benefits of further investment in training at all levels within the deer sector.

There were a number of calls for the development of a tagging system or an increased scrutiny of cull returns at the least. A number of individual responses proposed a ban on the sale of venison shot during the close season.

NGOs that argued against the need for close seasons pointed out that this would not be an issue as abuse would be related to welfare. Cruelty legislation would then be the mechanism by which cases would be tested.

### By Categories

“What means are there to prevent exceptions to close seasons being overused?”



## Summary of Responses to the DCS Consultation on Close Seasons March 2005

### Range Of Statements

DCS must encourage - deer managers with completing culls within existing seasons.
Don't allow them in the first place.
Tighter guidelines, clear legislation and clearer objectives in regard of the vision of deer in Scotland, agreed by all parties concerned.
All authorised by DCS.
All deer shot during the close season be registered and a law stating that game dealers should only pay a token price of 1p per pound.
It seems licences to shoot deer out of season are already overused.
Compulsory tagging scheme for all deer culled.
DCS should ensure that authorisations are not overused, and to ensure the "sustainable management of deer". Incentives should be given to ensuring suitable cull in season.
Serious problem must be referred to the DCS and DMGs in good time to assess and monitor the situation before action is carried out.
Out of season authorisation needs to have sufficient appraisal and checks on the applicant the needs, and number culled. The new system is excessive and requires a review.
DCS could set objective criteria, which from a nature conservation perspective would include the fulfilment of objectives to protect and manage designated sites under the terms of the Nature Conservation (Scotland) Act 2004 and the EU Birds and Habitats Directives.
Culling intensity is directed and focused effectively during the open season.
We recommend the expanded use of deer management plans with deer population analysis and measurements of deer impact on the habitat and natural heritage should ensure that culling intensity is directed and focused effectively during the open season.
Authorisation.
The DCS must act as an enforcement authority, with authorisation acting as the control mechanism on excessive use of exceptions.
All culling in closed season should be carried out under authorisation.
Do DCS not know that major forestry companies with expanding deer populations have not been replacing retiring/resigning stalkers but depend on more 26(2) 18(2) to meet cull targets?
Developing a code of practice, auditing statutory cull returns, adherence to best practice to venison and land management certification schemes, making public support for a deer management dependent upon adherence to best practice.
Deer should not be allowed for sale during close season. Would ensure all efforts made to cull effectively within open season.
We recommend the expanded use of deer management plans with deer population analysis and measurements of deer impact on the habitat and natural heritage should ensure that culling intensity is directed and focused effectively during the open season.
The exception is all ready the norm here.
Ban Close Season Venison sale.
Open season to be extended into the winter, it will also offer opportunities for pouching and illegal shooting which currently is restricted.
An extension to the current open seasons would help lessen the need for out of season shooting and raises the possibility that all shooting outside of extended seasons for females would have to be authorised by DCS.

# Summary of Responses to the DCS Consultation on Close Seasons March 2005

## Q5.1 Should all taking in the close seasons be subject to the same process?

### HEADLINES

<p><b>Q5.1 Should all taking in the close season be subject to the same process?</b></p>	<p><b>There is no evidence close season shooting that is not authorised by DCS, causes welfare problems</b></p>
	<p><b>All taking or killing in the close season should be authorised</b></p>
	<p><b>Those advocating no duty of care invariably sought tighter authorisation process</b></p>

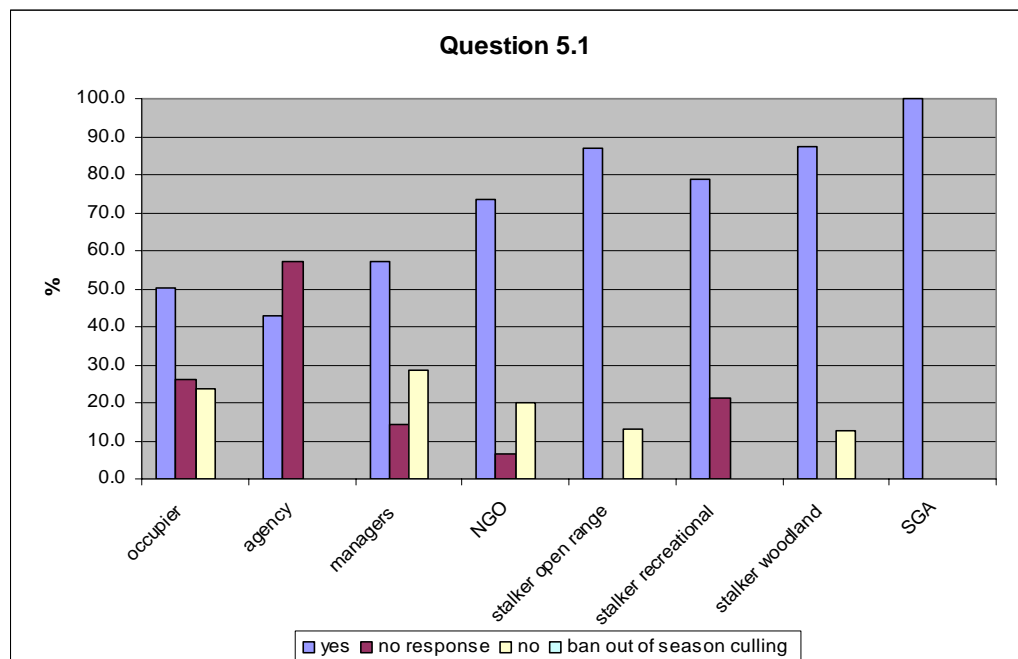
### SUMMARY

There was a clear majority support for all close season shooting to be authorised, in effect asking for the absolute removal of occupiers' rights to protect property and for the direct intervention of government. It is of interest that in reply to earlier questions there was a strong call for minimal interference from Government and that as deer were wild animals there was no need for a statutory duty of care or establishment of the owners responsibility towards that wild resource.

Highland Council, NFUS and SAC all felt that there would be no further welfare benefits to removing the current Section 26 conditions.

### By Categories

“Should all who take or kill deer during the close seasons be subject to the same authorisation process?”



## Summary of Responses to the DCS Consultation on Close Seasons March 2005

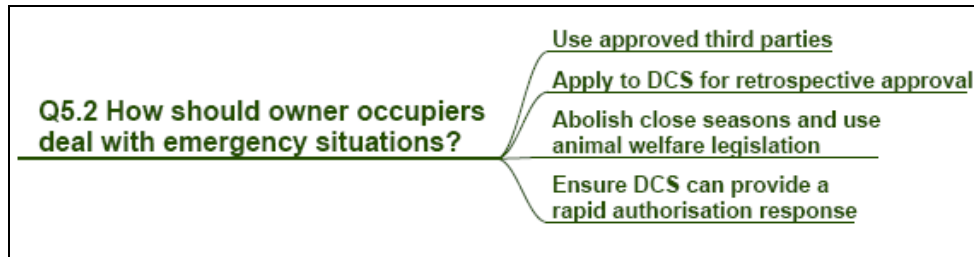
### Range Of Statements

Yes, no authorisation process would be required.
I believe the situation is almost out of control now and to retrieve it will take time, effort and investment.
While ensuring that all who kill deer out of season should be authorised has its attractions, we also recognise the need for the protection of owners' rights. Further evidence of deer welfare being compromised is needed before legislative change is considered.
DCS should use their discretion. Authorisations should not be hedged around with too many difficulties.
Yes and permission should be given rarely and cautiously and not in substitute for other more appropriate action.
Of course they should, especially including permission from the manager or estate because it is in the close seasons when public access is most utilised.
There should be no need for any deer to be shot out of season.
Once everyone knows that management must be completed within a certain date, without exception, they will complete.
All carcasses should be tagged and unused tags returned to DCS.
Where an occupier of land (as opposed to an owner/occupier) is the applicant, the application should be discussed with the owner before approval is given.
Owner/Occupiers etc should be able to respond to damage immediately. Sport shooters should not be able to shoot deer out of season.
The present out of season authorisation is a joke. No one bothers to apply.
This is the responsibility of owners/occupiers.

# Summary of Responses to the DCS Consultation on Close Seasons March 2005

## Q5.2 How should owner occupiers deal with emergency situations?

### HEADLINES

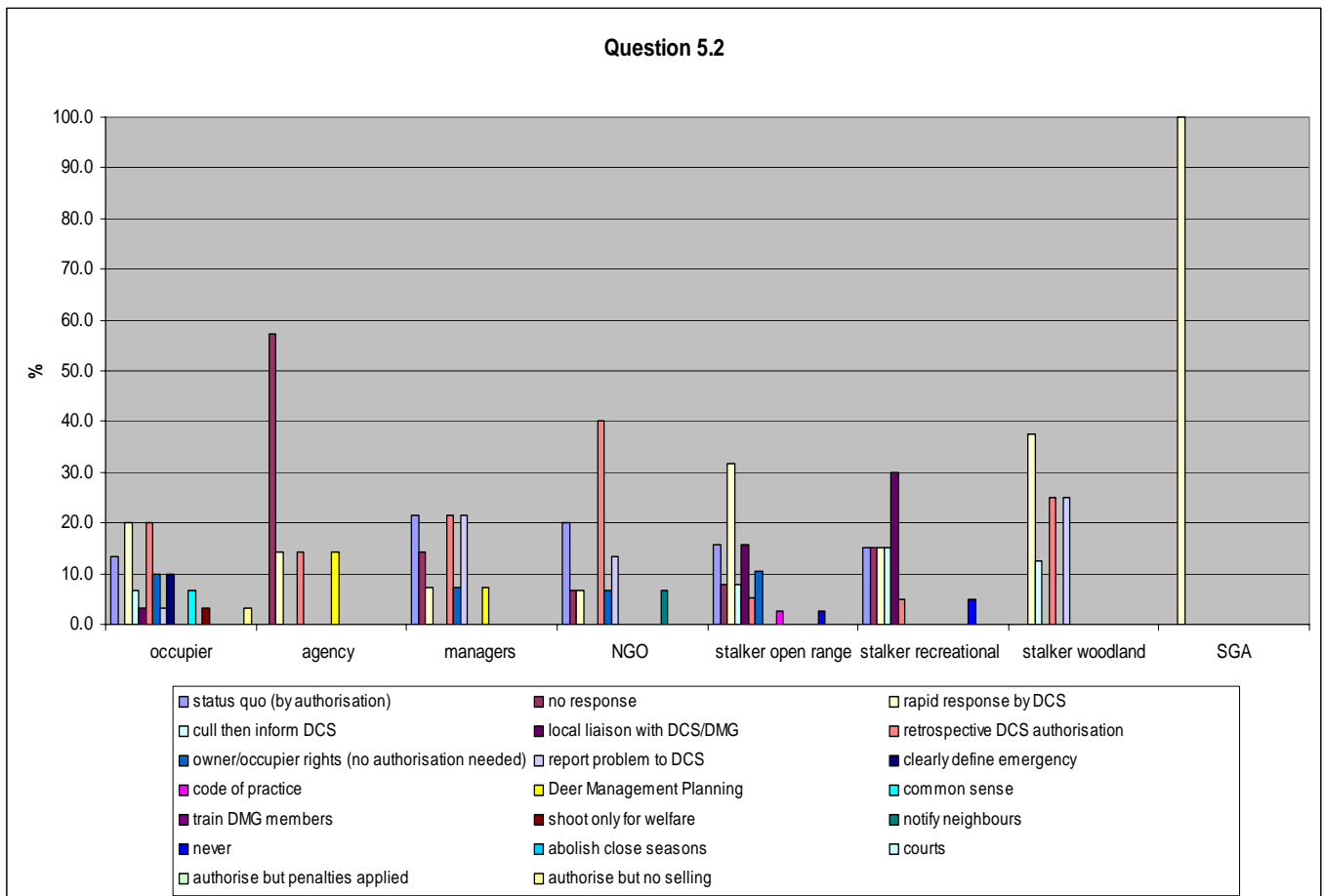


### SUMMARY

As can be seen from the graphs there were a variety of proposals put forward by respondents. These ranged from retaining the status quo to not allowing any close season shooting. Where respondents sought the intervention of DCS, there was a split as to whether this should be through a rapid response from DCS officers, retrospective authorisations or simply requiring the notification of action to DCS.

### By Categories

“How should owner/occupiers deal with an emergency situation within a closed season?”



## Summary of Responses to the DCS Consultation on Close Seasons March 2005

### Range Of Statements

Setting up a system which allows members of a DMG to assist in this type of situation. Once trained they would be able to responded quickly and offer advice.
Use own judgement without.
Report to required organisation.
As they always have - with level headed, long practised common sense. No legislation or advisory leaflets or paper returns are needed. Advice from the deer commission is always welcome.
Common sense will prevail.
Land occupier must assess situation and only undertake an immediate cull if there is an immediate threat or danger and that only sensible option is a cull. All such incidents must be reported to DCS and they must be able to investigate the position further and take appropriate action.
Owners/occupiers should retain the recourse to protect crops, natural heritage. DCS to ensure that this was justified, reasonable and appropriate action against the owner/occupier if it is found not to be so.
Any attempt to restrict current rights will be rejected and may lead to reduced cooperation in other areas.
Owner/occupiers should be able to deal with emergency situations without having to seek prior authorisation. They should however, notify DCS within 48 hours.
Emergency situations within a closed season should require notification to DCS within 24 hours of action being taken.
Shoot first, ask afterwards.
Clear definition of constitute an emergency and a rapid authorisation procedure.
Owners/occupiers should be able to cull on their own land during closed seasons but possibly inform DCS afterwards within a given time scale.
Action should then be reported to the DCS as soon as possible, with the DCS then issuing 'retrospective' authorisation.
We have all the mechanisms in place to manage our deer. Make sure these work through a clearly understood method of granting licences for out of season culls, win the hearts and minds, the three duties of care are adhered to.
If close seasons were abolished, this problem would not arise.
Some common sense was used by the experts who think trees will grow.
Facts should be reported at least within 48 hours to DCS with full justification so retrospective authority can be issued. Similar clauses in firearms act.
Emergency and a rapid authorisation procedure.
DCS officer should be on call for consultation at all times and be responsible for liaising with neighbours and/or the local DMG.
Emergency situations should not arise if DMG working properly. Penalties should be applied if emergency situations arise without their boundaries.

## Summary of Responses to the DCS Consultation on Close Seasons March 2005

### APPENDIX 1 List of Respondents

Achentoul Estate			
Advocates for Animals	Mr.	Peter	Stevenson
Altnaharra Estate	Mr.	Pieter	Bakker
Alvie & Dalraddy Estates	Mr.	Jamie	Williamson
Ardross Community Council		John	Edmondson
Argyll & Bute Council		Sue	Williams
Association of DMG	Mr.	Richard	Cooke
Atholl Estates	Mr.	Malcolm	Whyte
Ballogie Estates	Mr.	Victor	Clements
Balmoral Estate	Mr.	Peter J.	Ord
Balnacoil Estate	Mr.	James	Tyser
BASC Scotland	Mr.	Colin	Shedden
Ben Alder Estate	Mr.	Ian	Crichton
Ben Alder Estate	Mr.	Patrick H.	Thompson
Bighouse Estate	Mr.	C.	Richardson
Borders Forest Trust	Mr.	Hugh	Chalmers
Borrobol Deer Forest	Mr.	Michael	Wigan
Breadalbane DMG	Mr.	W H	Barbour
British Deer Society	Mr.	Hugh	Rose
Camusericht Estate	Mr.	Calum	Gillies
Camusericht Estate	Mr.	George A.	MacDonald
Cluanie Estate	Mr.	Rhuaridh	Campbell
Corriclair Estate		Lynda	Campbell
Corrour Trust	Mr.	Niall	Rowantree
Culquoich Estate	Mr.	Alistair	Loder
Dalmigarry Estate			
Dalmigavie Estate	Sir	Edward	Greenwell, Bt.
Donalds - Chatered Surveyors			
Dunalastair Estate	Mr.	Ian	de Sale La Terriere
East Ayrshire Council		William	Stafford
East Grampian DMG	Major	John	Gibb
East Sutherland DMG	Mr.	David J	Greer
Edraynate Estate			
EWWM Ltd	Mr.	Ronald D.	Rose
Forestry Commission Scotland	Mr.	Ian	Forshaw
Foster Yeoman Ltd	Mr.	Kurt	Larson
Foster Yeoman Ltd	Mr.	Robert	McLellan
Game International Ltd	Mr.	Calvert	McKibben
Glencassley Estate	Mr.	David J	Greer
Glenelg Peninsula DMG		Lynda	Campbell
Glenlyon Estate	Mr.	Iain	Wotherspoon
Ian Brown & Sons		Lynda	Campbell
Invercauld Estate	Mr.	J S	Blackett
Invergeldie Estate	Mr.	Andy	Rogerson
John Muir Trust	Mr.	Keith r	Miller

## Summary of Responses to the DCS Consultation on Close Seasons March 2005

Keanchulish Estate	Mr.	David J	Greer
Kildermorie Estate	Mr.	Ian A.	Duncan
Kingie		Lynda	Brown
Lairg Estate	Mr.	David J	Greer
Lantra	Mr.	Michael	Bruce
League Against Cruel Sports		Jess	Barker
Leckmelm Deer Forest	Mr.	D.	Wynne
Ledmore Estate	Mr.	David J	Greer
Luss Estates Company			
Meggernie Estate			
NFU Scotland	Ms	Lisa	Webb
North Ross DMG	Mr.	David J	Greer
North West Sutherland DMG			
Orkney Islands Council			
Perth & Kinross Council		Brenda	Clough
RICS	Ms	Rhona	MacDonald
RSPB Scotland	Mr.	Duncan	Orr-Ewing
SAC Farm Business Services	Mr.	George	Marshall
Sandside Estate	Mr.	Alan	Sandison
Savills	Mr.	R F	d'Anyers Willis
Savills	Mr.	James	Adamson
Scottish Association for Country Sports	Mr.	David	Cant
Scottish Countryside Alliance	Mr.	Tony	Andrews
Scottish Estates Business Group	Ms	Polly	McPherson
Scottish Game Dealers / Processors Association	Mr.	Ian H.	MacKinlay
Scottish Gamekeepers Association	Mr.	Alex	Hogg
Scottish Rural Property & Business Association	Mr.	Jonathan R	Hall
Scottish SPCA	Mr.	Michael	Flynn
SNH	Mr.	John	Thomson
Strathtay DMG	Mr.	William	Jackson
Suisgill Estate	Mr.	E. M.	Reeves
Tayside Police	DC	Ian	Gordon
The Game Conservancy Trust	Mr.	Ian	MacCall
The Highland Council		Robbie	Bain
The Highland Council		John	Rennilson
The National Trust for Scotland	Mr.	John	Mayhew
The Scottish Gamekeepers Association	Mr.	Alex	Hogg
The Welbeck Estate			
Ulbster Estate			
Union of Country Supports Workers	Ms	Phillippa	White
West Dunbarton Council		Dan	Henderson
West Glenalmond Estate	Mr.	R. A.	Montgomerie

## Summary of Responses to the DCS Consultation on Close Seasons March 2005

### Individuals

Mr. Gordon Adamson	Mr. S. C. Barnard	Lord Burton
Mr. William Angus	Mr. David Barnes	Mr. David Butowski
Mr. G. Bickley	Mr. Keith Barnett	Mr. A. Butter
Mr. P. J. Boyle	Mr. G. C. Barnett	Mr. Pete Byrne
Mr. Neil Cameron	Mr. John Barrett	Mr. Peter Cairney
Mr. Lee F. Dunn	Mr. John H. Barron	Mr. Derek Calder
Mr. T. E. Foulis	Mr. Nigel Barron	Mr. David Callan
Mr. John Fraser	Mr. C. S. Barron	Mr. Robin Callander
Mr. A. Gourlay	Mr. Michael A. Baum	Mr. T. Callum
Mr. William Hill	Mr. J. Baxter	Mr. John Cameron
Mr. Andrew Illston	Mr. G. Beaddit	Mr. John Cameron
Mr. G. L. Jackson	Mr. Kevin Beard	Mr. D. Cameron
Mr. A. James	Mr. Allan Beattie	Mr. Donald Cameron
Mr. J. Jenkins	Mr. Gavin Beattie	Mr. Hugh Cameron
Mr. David Johnstone	Mr. E. Beattie	Mr. Hamish Cameron
Mr. Ewen Kennedy	Mr. Brian Beattie	Mr. Duncan Cameron
Mr. John Kennedy	Mr. Matt Beaumont	Mr. Angus Cameron
Mr. Rupert Longsdon	Mr. Douglas Bell	Mr. David Cameron Foote
Mr. T. MacDonald	Mr. Peter Bell	Mr. Calum Campbell
Mr. Ian MacPhee	Mr. Andrew Bell	Mr. William Campbell
Mr. G. L. Mallinson	Mr. Iain Bennett	Mr. Colin Campbell
Mr. Gavin McDowall	Mr. Duncan Bentley	Mr. Ian Campbell
Mr. Hugh McNeil	Mr. R. J. Berrie	Mr. David Campbell
Mr. James Middleton	Mr. Neil Bertram	Mr. Douglas Campbell
Mr. Paul Motttram	Mr. Henry Birkbeck	Mr. Kenneth Campbell
Mr. J. B. Murdock	Mr. Tony Black	Mr. David Campbell
Mr. Alisdair Troup	Mr. J. Black	Mr. Gavin Campbell
Mr. Alan Watt	Mr. J. S. Blacket	Mr. Malcolm Campbell
Mr. Colin Adamson	Mr. R. G. Blackett	Mr. Jamie Campbell
Mr. James Adamson	Ms. Geva Blackett	Mr. A. J. Carlsen
Mr. J. Adamson	Mr. George Blackie	Mr. Tom Carmichael
Mr. David Adraham	Mr. Jake Blackwood	Mr. William Carnegie
Mr. Thomas Aitchison	Mr. Bill Blair	Mr. David Carter
Mr. I.C.N. Alcock	Mr. Stewart Blair	Mr. E. J. Carter
Mr. Walker Allan	Mr. Keith Thomas Blake	Mr. W. D. Cartledge
Mr. Philip Allan	Mr. S Block	Mr. Dave Cartwright
Mr. D. Allingham	Mr. C. J.Boam	Mr. Robert Cathery
Mr. Mike Allison	Mr. K. Bonnar	Mr. Alastair Chalmers
Mr. Simon Amos	Mr. Ian Bonner	Mr. Anderson Chalmers
Mr. Chris Amos	Mr. Robert J. Booth	Mr. Harry Chalmers
Mr. Peter Anderson	Mr. Alan Booth	Mr. Cameron Chapman
Mr. E. B. Anderson	Mr. Paul Bore-Grech	Mr. Andy Charlesworth
Mr. James Anderson	Mr. James Borns	Mr. J. Cheade
Mr. Euan Anderson	Mr. Roger L. Bowen	Mr. James Chester
Mr. Robert Anderson	Mr. Stephen Bower	Mr. Thomas Christie
Mr. Thomas Anderson	Mr. Charlie Boyd	Mr. J. Christie
Mr. Jimmy Anderson	Mr. John Boyd	Mr. J. Chrystie
Mr. David Anderson	Mr. R. Bradley-Stevenson	Mr. Winston Churchill
Mr. Dennis Andrew	Mr. Steve Brand	Mr. Doug Clapperton
Mr. S. L. Andrews	Mr. Robert Brannan	Mr. Robert Clark
Mr. Alexander Andrews	Mr. Derek Branney	Mr. James G. Clark
Mr. James Angus	Mr. Graham Bratchie	Mr. Rab Clark
Mr. Mark Ansell	Mr. Leonard Bray	Mr. John Clark
Mr. Tom Armitage	Mr. Derek W. Bray	Mr. Alastair Clark
Mr. W. Armstrong	Mr. Raymond Breau	Mr. G. Clark
Mr. Robert Armstrong	Mr. W. J. Brennan	Mr. Derek Clark
Mr. J. Arnott	Mr. Donald E. Broad	Mr. Paul Clayworth
Mr. W. S. Ash	Mr. W. G. Brough	Mrs.. J. Clements
Mr. William Auchterlounie	Mr. Michael A S Brown	Mr. David Clyde
Mr. Peter Baikie	Mr. Alexander Brown	Mr. George M. Clyne
Mr. I. Bailey	Mr. Peter A. Brown	Mr. John J. Coats
Mr. Mark J. Bailey	Mr. Neil Brown	Mr. Ian Cochrane
Mr. Philip H. M. Bailey	Mr. Ian Brown	Mr. W. Cole
Mr. Andrew Baillie	Mr. Mark Brown	Mr. Peter Collins
Mr. JMB Baillie-Hamilton	Mr. Iain Brown	Mr. Donald Collins
Mr. James Bain	Mr. William Brown	Mr. R.A.H. Colquhoun
Mr. Robbie Bain	Mr. David Brown	Mr. Alasdair Colquhoun
Mr. W. Baird	Mr. Mervyn Brownie	Mr. C. R. Connell
Mr. Ewen Ballantyne	Mr. Ian Brownlee	Mr. B. Cook
Mr. A. P. Ballantyne	Miss Pamela Brownlie	Mr. P. Cooper
Mr. E. W. Banister	Mr. John A. Bruce	Mr. Thomas Copeland
Mr. D. S. Banister	Mr. James Bruce	Mr. Eric Copland
Mr. Peter Banks	Mr. Robert Buchan	Mr. W. K. Copland
Mr. D. Banks	Mr. Maurice Burnand	Mr. James Corbett
Mr. Carl Banner	Mr. Willie Burnett	Mr. A. G. Cormack
Mr. Leo Barclay	Mr. Robin Burnett	Mr. Stuart Cormie
Mr. Eddie Barclay	Mr. G. Burnett-Stuart	Mr. Arthur Cossar

## Summary of Responses to the DCS Consultation on Close Seasons March 2005

Mr.	Graham Cost	Mr.	A. K. Dykes	Mr.	John Girryty
Mr.	David Cotton	Mr.	Robert Edgar	Mr.	J. D. Girvan
Mr.	Bryce Coutts	Mr.	John Edmondson	Mr.	Peter Givenns
Mr.	L. Cowieson	Mr.	R. Edwards	Mr.	E. Glass
Mr.	G. D. Coyne	Mr.	David Elder	Mr.	Ian M. Glennil
Mr.	Andrew Craig	Mr.	John Ellerker	Mr.	D. C. Glenview
Mr.	Peter Craig	Mr.	Stephen Ellis	Mr.	Gerald F. Glover
Mr.	Nigel Craig	Mr.	Steve Ellwood	Mr.	R. Goldie
Mr.	Andrew Craig	Mr.	Callum Entwistle	Mr.	Pete Goodsir
Mr.	Peter Crawford	Mr.	L. Entwistle	Mr.	Derek Goodwin
Mr.	William Crawford	Mr.	Colin Espie	Mr.	William A. Gordon
Mr.	William Cruckshank	Mr.	S. Etherson	Mr.	James Gordon
Mr.	John Cruickshanks	Mr.	Hugh Evans	Mrs	Heather Gow
Mr.	J D W Crystal	Mr.	Edward Farish	Mr.	Steven Gow
Mr.	P. D. Cumming	Mr.	S. Farish	Mr.	Alastair Gowans
Mr.	F. Cumming	Mr.	William Farish	Mr.	Peter H R Graham
Mr.	Andrew Czajo	Mr.	Robert Farquhar	Mr.	Drew C. Graham
Mr.	Ken Dakers	Mr.	M. J. Farr	Mr.	Donald Graham
Mr.	Alex Dalgleish	Mr.	Duncan Ferguson	Mr.	George Graham
Mr.	T. W. Darragh	Mr.	N. Ferguson	Mr.	William Graham
Mr.	D. Darvill	Mr.	Peter Ferguson	Mr.	David Graham
Mr.	Peter Davidson	Mr.	Nicolas Ferguson	Mr.	William Grant
Mr.	James Davidson	Mr.	R. Ferguson	Mr.	Kevin Grant
Mr.	Billy Davidson	Mr.	E. F. Fernie	Mr.	Hugh Grant
Mr.	James Davidson	Mr.	John Fernie	Mr.	Albert Grant
Mr.	Jenny Davidson	Mr.	William Ferrand	Mr.	Wayne Grant
Mr.	R. Davidson Jnr	Mr.	Murdo Fin Layson	Mr.	Wallace Grant Jnr
Mr.	R. Davidson Snr	Mr.	J Stuart Flett	Mr.	Christopher Gray
Mr.	David Davies	Mr.	Ian Flockhart	Mr.	Mark Gray
Mr.	A. G. Davis	Mr.	Colili Foote	Mr.	David Grayling
Mr.	K.J. Dawes	Mr.	W Forbes	Mr.	Brian Green
Mr.	Geoffrey Dawkins	Mr.	David B. S. Forbes	Mr.	Alexander Green
Mr.	Jim Dawson	Mr.	R. M. Forbes	Mr.	Gordon A. Green
Mr.	Rupert de Klee	Mr.	K. Forbes	Mr.	A. Grewal
Mr.	Douglas Dear	Mr.	Wayne Forrest	Mr.	Stewart Grieve
Mr.	Andrew Dempster	Mr.	David Fors	Mr.	K J Griffin
Mr.	Ian Dempster	Mr.	Ian Forsyth	Mr.	D.M.G. Griffiths
Mr.	Lamb Denis	Mr.	Jack Fowler	Mr.	L. K. Griffiths
Mr.	Andy Denton	Mr.	John Fowler	Mr.	Neil C. Gunn
Mr.	James Dewar	Ms.	Alice Fox-Pitt	Mr.	Ian Hall
Mr.	Jeremy Dewhurst	Mr.	Allan Frame	Mr.	Gerald Hall
Mr.	Brian Dey	Mr.	Peter Fraser	Mr.	Ben Hallam
Mr.	Sandy Dey	Mr.	Donald Fraser	Mr.	V C Hamilton
Mr.	William Dey	Mr.	Hamish Fraser	Mr.	J. Hamilton
Mr.	Colin Dey	Mr.	Steven Fraser	Mr.	Ronald Hamilton
Mr.	George W. Dey	Mr.	Brian Fraser	Mr.	Alexander Hamilton
Mr.	Leonard Dey	Mr.	Alexander Fraser	Mr.	Gavin Hanwam
Mr.	Sabine Dey	Mr.	Steven Fraser	Mr.	William W. Hardy
Mr.	J. Dickson	Mr.	James Ian Fraser	Mr.	Alex Harkness
Mr.	Michael Dilks	Mr.	Iain J. Fraser	Mr.	Robert Harper
Mr.	Kenneth Dilrs	Mr.	Ian Fraser	Mr.	Alan Robert Harris
Mr.	Ian Dingwall	Mr.	Graham Fraser	Mr.	Allan Harrow
Mr.	Robert Dinnie	Mr.	Donald Fraser Snr	Mr.	J. A. Haseldive
Mr.	Allan Dodd	Mr.	Harry Frater	Mr.	G. Hasson
Mr.	Alexander Don	Mrs.	Freeman	Mr.	Kenny Hastings
Mr.	Stuart Donald	Mr.	T Frost	Mr.	John Y. L.Hay
Mr.	P. Donald	Mr.	M Frost	Mr.	David Hay
Mr.	William Donald	Mr.	Falcon Frost	Mr.	Archie Hay
Mr.	T. H. P. Donald	Mr.	William Fulton	Mr.	Marjorie Hayes
Mr.	Gregor Donaldson	Mr.	James Gallagher	Mr.	Brian Hayes
Mr.	C. Donaldson	Mr.	Will Gallant	Mrs..	E. Heard
Mr.	T. A.Donaldson	Mr.	Phil Gallie MSP	Mr.	G. W. Heggs BSc
Mr.	Gregor Donaldson	Mr.	John Galloway	Mr.	C. Henderson
Mr.	A. Donnan	Mr.	C. Gamble	Mr.	D. G. Henderson
Mr.	Alan Douglas	Mr.	Thomas Gannon	Mr.	John Henderson
Mr.	Fraser Douglas	Mr.	R. W. Gasloyne	Mr.	R. M. Henderson
Mr.	Paul Dourley	Mr.	Michael Gaud	Mr.	Mike Henderson
Mr.	James S Dowell	Mr.	A. Gemmell	Mr.	Colin Hendry
Mr.	Alex Downie	Mr.	William George	Mr.	Stephen Henry
Mr.	Ian Downie	Mr.	Ken Gibbon	Mr.	Iain Hepburn
Mr.	J. Downie	Mr.	S. C.Gibbs	Mr.	Ronald Hepburn
Mr.	Arthur Duffus	Mr.	Alistair H. Gibson	Mr.	Kenneth Herning
Mr.	Gordon Duguid	Mr.	William Gilbertson	Mr.	Philip Heseltine
Mr.	Ken Duguid	Mr.	Tom Gilchrist	Mr.	Bryce Hidding
Mr.	Ian Duncan	Mr.	William Gilchrist	Mr.	J. Higson
Mr.	Colin Dunchappin	Mr.	William Gillanders	Mr.	William Hilditch
Mr.	Thomas Dunn	Mr.	G. B. Gilles	Mr.	Donald Hill
Mr.	John Dunne	Mr.	Alastair Gillir	Mr.	Nicholas Hill
Mr.	Gary Dyer	Mr.	I. J. Girdwood	Mr.	Richard Hilman-Baird

## Summary of Responses to the DCS Consultation on Close Seasons March 2005

Mr.	S. Hinshelwood	Mr.	B. G. Leader	Mr.	David MacRobert
Mr.	Russell Hird	Mr.	G. Alastair	Mr.	A. Magson
Mr.	Colin Hisbent	Mr.	Lean	Mr.	Ross Maitland
Mr.	P. W. Hoare	Mr.	Robert Lean	Mr.	J. R. Mallinson
Rev.	T. Hoare	Mrs	Yvonne Learmonth	Mr.	Gareth Mann
Mr.	Kyle Hogg	Mr.	Derek Ledingham	Mr.	Peter Manson
Mr.	Alex Hogg	Mr.	J. A. Lees	Mr.	Stephen March
Mr.	D. M. Holman	Mr.	Ian Lees	Mr.	Graham J Marr
Mr.	Robert Hood	Mr	R. Legge	Mr.	K. Marriott
Mr.	K. R. Hope-Srobat	Mr.	David Leith	Mr.	Gordon Marshall
Mr.	Norman John House	Mr.	William Leonard	Mr.	W. Marshall
Mr.	Alexander Houston	Mr.	John Leonard	Mr.	Gordon Marshall
Mr.	D.A.R. Houston	Mr.	Gordon Levack	Mr.	Stewart Marshall
Mr.	George Howat	Mr.	Scott Lindsay	Mr.	Ian Martin
Mr.	John Howe	Mr.	G. R. Linton	Mr.	Tom Martin
Mr.	P. G. Howson	Mr.	David Little	Mr.	D. W. Martin
Mr.	Philip C. Hoyer	Mr.	Andrew Livingstone	Mr.	G. C. Masson
Mr.	David Hudson	Mr.	Gilbert Logan	Mr.	Jonh Matheson
Mr.	Ian Hudson	Mr.	Richard Longster	Mr.	William A. Matheson
Mr.	John Hughes	Sir	Ian Lowson	Mr.	Ruari Matheson
Mr.	Andrew Humphers	Mr.	Richard Lumsden	Mr.	Peter Maver
Mr.	Alastair Hunter	Mr.	Mike Luti	Mr.	Gavin Maxwell
Mr.	Erin Hunter	Mr.	Robert Lyall	Mr.	James May
Mr.	Donald Hutton	Mr.	Brian Lyall	Mr.	Brian McBain
Mr.	Albert Imlach	Mr.	David Lyon	Mr.	Richard McBay Taylor
Mr.	Duncan R. Inglis	Mr.	Neil Lyon	Mr.	Jim McClemont
Mr.	Fraser Inglis	Mr.	Robert Lyon	Mr.	Dennis McColgan
Mr.	A. M. Ireland	Mr.	Danny Lyon	Mr.	Gordon McComb
Mr.	Alan Jack	Mr.	C. Paul Lyttle	Mr.	A. J. McConnachie
Mr.	R. F. Jack	Mr.	Iain MacAskill	Mr.	W. S. McCormack
Mr.	A. H. Jack	Mr.	R. H. MacBain	Mr.	S. McCormack
Mr.	Roger Jackson	Mr.	Alan MacChillivray	Mr.	Robert McCuaig
Mr.	Roy Jacob	Mr.	M MacClean	Mr.	Duncan McFarlane
Mr.	P. Jaggard	Mr.	Alasdair MacDonald	Mr.	Steven McGeachie
Mr	S.C. Jaggard	Mr.	Douglas MacDonald	Mr.	R. J. Mcgeachy
Mr.	Henry Jamieson	Mr.	Robert MacDonald	Mr.	David McGill
Mr.	Alan Jentura	Mr.	Steven MacDonald	Mr.	William McGinlay
Mr.	Andrew Johnson	Mr.	D. MacDonald	Mr.	Donald McGinn
Mr.	Morgan David Jones	Mr.	J. MacDonald	Mr.	Frank McGrath
Mrs.	Valerie Jones	Mr.	David MacDonald	Mr.	Allan McIntal
Mr.	John M. Kay	Mr.	K. J. MacDonald	Mr.	R. McIntosh
Mr.	Adam Kay	Mr.	Iain MacDonald	Mr.	Craig McIntosh
Mr.	Brian Keith	Mr.	Alex MacDonald	Mr.	John McIntyre
Mr.	N. Kellas	Mrs.	E. J. MacDonald	Mr.	Alan McIntyre
Mr.	Brian Kelly	Mr.	Donald MacDougall	Mr.	J. McKeachnie
Mr.	Lewis Kelly	Mr.	Roy MacFarlane	Mr.	Dan McKeehan
Mr.	Mark Kelman	Mr.	Gordon MacGibbon	Mr.	A. McKenna
Mr.	J. Kennan	Mr.	Freddy MacKay	Mr.	D. McKenna
Mr.	Ian Kennedy	Mr.	G. R. MacKay	Mr.	Ian McKenzie
Mr.	G B Kerr	Mr.	Gavin MacKay	Mr.	IainMcLaren
Mr.	Mark Kerr	Mr.	Roderick MacKenzie	Mr.	G. A. McLauchlan
Mr.	Gary Kerr	Mr	P. MacKenzie	Mr.	John McLellan
Mr.	J. M. Kerr	Mr.	John MacKenzie	Mr.	R. McMillan
Mr.	Ian R. Kerr	Mr.	Gunn	Mr.	Chris McMillian
Mr.	Peter Keyser	Mr.	Hans MacKenzie-Wilson	Mr.	Donald McMurdo
Mr.	Gordon Kibble	Mr.	Alistair MacKie	Mr.	Alasdair McNaughton
Mr.	Brian King	Mr.	Ronald MacKie	Mr.	John McNeice
Mr.	Jeffrey King	Mr.	Ian MacKinlay	Mr.	Robert McNeil
Mr.	C. Kippen	Mr.	G.D.W. MacKinlay	Mr.	Stuart McNeill
Mr.	R. Kippen	Mr.	A. MacKinnon	Mr.	George McNeill
Mr.	Andrew Kirk	Mr.	Alistair MacKintosh	Mr.	Robert McNeill
Mr.	Andrew Kirk	Mr.	A. MacKintosh	Mr.	Chris McRae
Mr.	Peter Kirkwood	Mr.	J. M. MacKintosh-Walker	Mr.	W. McWatt
Mr.	John Kisielewski	Mr.	Murdoch MacLean	Mr.	John McWilliams
Mr.	Richard Knaggs	Mr.	William MacLennan	Mr.	Arthur Donald Melnie
Mr.	R. Knight	Mr.	A. MacLennan	Mr.	Richard Melton
Mr.	Kenneth Knott	Mr.	Kenneth MacLeod	Mr.	A. Menmuir
Mr.	James Knowles	Mr.	Duncan MacLeod	Mr.	R. Michael
Mr.	David Kyle	Mr.	Ross MacLeod	Mr.	William Miler
Mr.	F. Laing	Mr.	Loudon MacLeod	Mr.	Gilbert Millar
Mr.	Alexander Laing	Mr.	Georgie MacLeod	Mr.	Iain Millar
Mr.	John Lamb	Mr.	John MacLeod	Mr.	James Miller
Mr.	Jimmy Lambie	Mr.	Angus MacMillan	Mr.	Simon Miller
Mr.	D. Langlands	Mr.	J. C. MacNab	Mr.	Rodney Milligan
Mr.	G. Latham	Mr.	Michael MacNally	Mr.	Colin Milligan
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Mr.	Graham Laughton	Mr.	John MacPherson	Mr.	S. G.H. Mills
Mr.	Jim Lawrie	Mr.	B. R. MacRae	Mr.	A. F. Millward
Mr.	A. Leader	Ms.	M. MacRae	Mr.	Frazer Milne

## Summary of Responses to the DCS Consultation on Close Seasons March 2005

Miss	H Mitchell	Mr.	John Pease	Mr.	Judith Ross
Mr.	William Mitchell	Mr.	Ian Malcolm	Mr.	William Ross
Mr.	Ronald Mitchell	Mr.	Peek	Mr.	William Ross Jnr
Mr.	Brian Mitchell	Mr.	G. Pemman	Mr.	Henry Rosson
Mr.	Keith Mitchell	Dr.	P. O. Pern	Mr.	W. C. Rourke
Mr.	Charlie Moir	Mr.	John Perry	Mr.	Alnslie Rourke
	Peregrine Moncrieffe	Mr.	Peter	Mr.	Jeff Rowlands
Mr.	John Barry Morgan	Mr.	Kevin Peters	Mr.	Iain Roxburgh
Mr.	Michael Morhulec	Mr.	Antony R Peters	Mr.	C. Rundel
Mr.	N. J. Morley	Mr.	Alasdair B. Petrie	Mr.	C. Rundel
Mr.	David Morrin	Mr.	Garry Pettingale	Mr.	A. Russell
Mr.	A. Morrison	Mr.	R. E. Philippi	Mr.	R. Rutherford
Mr.	Neil Morrison	Mr.	Karl Talbott Pipes	Dr.	Sanjar Sadeghzadeh
Mr.	Glyn Morrison Sawers	Mr.	Charles Pirie	Mr.	John Salkeld
Mr.	Barrie Morton	Mr.	Charles Pirie	Mr.	S. Sall
Mr.	Edward Mountain	Mr.	J. A. Pirrie	Mr.	Carl Sandever
Mr.	Charles Muhro	Mr.	B. K. Pitchers	Mr.	C. J. Savory
Mr.	Nick Muir	Mr.	J. S. Player	Mr.	Ian Sawyer
Mr.	Bill Muircroft	Mrs.	Ann Playle	Mr.	Kim Sawyer
Mr.	Ian Muirhead	Mr.	S. Poniar	Mr.	Ian Arthur Scott
Mr.	C. Munro	Mr.	Duncan Poore	Mr.	Ken Scott
Mr.	Ritchie Murchison	Mr.	Will Porter	Mr.	Scott
Mr.	Alastair Murray	Mr.	Stephen Potter	Mr.	Graham Scott
Mr.	Peter Murray	Mr.	Andrew H. Potts	Mr.	Cameron Scott
Mr.	W. B. Murray	Mr.	Andrew Powis	Mr.	David Scott
Mr.	Iain Murray-Thomson	Mr.	J. M. Prince	Mr.	Andrew H. Scott
Mr.	Brian Mutch	Dr.	Rory Putman	Mr.	Gordon Scott
Mr.	Limac Nally	Mr.	J. P. Quigg	Mr.	Alastair H. Scott
Mr.	Alan Neill	Mr.	Colin Quinn	Mr.	Campbell Scott
Mr.	David Neilson	Mr.	T. Quinn	Mr.	P. Scott
Mr.	Ronald Nelson	Mr.	Fred Rae	Mr.	Iain Semple
Mr.	Antony Niall	Mr.	G. C. Rafferty	Mr.	Kenneth Shand
Mr.	David Nicholson	Mr.	Andrew Rafferty	Mr.	Allan Shand
Mr.	Andrew Nicholson	Maj. Gen.	Ramsay	Mr.	Callum Sharp
Mr.	Ivan Nicholson	Mr.	Andrew Ramsay	Mr.	Tom Sharp
Mr.	William Nicol	Mr.	A. Ramsay	Mr.	Charles Shaw
Mr.	Luke Nicol	Mr.	Graham Rankine	Mr.	Harry Shaw
Mr.	Alexander Norman	Mr.	George Reaford	Mr.	H. Shearer
Mr.	Ian Richard Oates	Mr.	Neil Redford	Mr.	William Shirkie
Mr.	J. Oates	Mr.	Roy Redman	Mr.	Mark Shone
Colonel	O'Brien	Mr.	John Reid	Mr.	Duncan Shotts
Mr.	A O'Connell	Mr.	R. Reid	Mr.	M. Simpson
Mr.	F. O'Connor	Mr.	Roy Reid	Mr.	N. Simpson
Earl of Shrewsbury		Mr.	Lewis S. Reid	Mr.	Gordon Simpson
Mr.	Donald Ogilvey-Watson	Mrs.	M. E. Reid	Mr.	J. W. Simpson
Mr.	John D. Oliver	Mr.	Alexander Rennie	Mr.	Callum Simpson
Mr.	James O'Neill	Mr.	John Rennilson	Mr.	Marty Simpson
Mr.	Mike Ormiston	Mr.	Roy Renwick	Mr.	C. Simpson
Mr.	A. Osborne	Mr.	Michael Rhoden	Mr.	David Sinnet
Mr.	Michael O'Sullivan	Mr.	S. Richards	Mr.	J. Size
Mr.	Clive Ottwell	Mr.	Brian Richardson	Mr.	M. Skelly
Mr.	David Overton	Mr.	Trevor Richardson	Mr.	Colin Sloss
Mr.	G. J. Panter	Mr.	David Richardson	Mr.	Stephen Sloss
Mr.	James Park	Mr.	M. Richardson	Mr.	Andrew Smail
Mr.	William T. Parker	Mr.	Duncan Richardson	Mr.	I. Smart
Mr.	Charles Parker	Mr.	Stan Riches	Mr.	H. Smethurst
Mr.	W. E. Parr	Mr.	George Richie	Mr.	R. Smith
	Annett Parrott	Mr.	Robert Richie	Mr.	Peter Smith
Mr.	Michael Pate	Mr.	Jimmie Riggles-Brise	Mr.	Thomas Smith
Mr.	Brian Paterson	Mr.	Mike Ritchie	Mr.	Andrew Smith
Mr.	Henry Paterson	Mr.	Derek Roberts	Mr.	James Smith
Mr.	Mark Paterson	Mr.	Toby Robertson	Mr.	Thomas Smith
Mr.	Lee Paterson	Mr.	Gerry Robertson	Mr.	William Smith
Mr.	Graeme Paterson	Mr.	John Robertson	Mr.	Charles Smith
Mr.	Jack Paterson	Mr.	Allan Robertson	Mr.	Mike Smith
Mr.	James Paterson	Mr.	Harry Robertson	Mr.	Sturat Smith
Mr.	Ben Paterson	Mr.	Hamish Robertson	Mr.	Paul Smith
Mr.	John Paterson	Mr.	Peter Robinson	Mr.	Michael C. Smith
Mr.	F. Paterson	Mr.	Allan Robinson	Mr.	Robert B. Smith
Mr.	Craig Paterson	Mr.	Nigel Robinson	Mr.	D. Eoin Smith
Mrs.	Margaret Paterson	Mr.	Billy Robison	Mr.	Karen Smith
Mr.	David Paton	Mr.	Donald Rose		Louise Smith
Mr.	Craig Paul	Mr.	R. R. Rose	Mr.	Robert Somers
Mr.	Alex Paul	Mr.	Tommy Ross	Mr.	Gordon Spaley
Mr.	Jim Paxton	Mr.	Craig Ross	Mr.	Arthur Spurling
Mr.	J G Payne	Mr.	Christopher Ross	Mr.	Scott Spurt
Mr.	S. Payne	Mr.	Martin Ross	Mr.	Lester Standen
Mr.	James Pearson	Mr.	Gordon Ross	Mr.	Colin Stark
Lord	Pearson	Mr.	Michael Ross	Mr.	Steel

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Mr.	Gordon Steel	Mr.	P. Van Vlissinga	Mr.	Robert Yule
Mr.	Harry Steel	Mr.	J. Vestey	Mr.	Donald P. Yule
Mr.	Alistair Stephen	Mr.	P. G. Wadland	Mr.	Eric Zamm
Mr.	Iain Stephens	Mr.	Mark Waisby		
Mr.	J. A. Steven	Mr.	Charles Wake		
Mr.	Gary Stevenson	Mr.	Robin Walecki		
Mr.	A. Stevenson	Dr.	John Walker		
Mr.	David Stevenson	Mr.	Robert Walker		
Mr.	Barry Stewart	Mr.	David Walker		
Mr.	Graeme Stewart	Mr.	Allan Walker		
Mr.	David Stewart		Fiona Walker		
Mr.	Iain Stewart	Mr.	B. S. Walls		
Mr.	Euan Stewart	Mr.	George Watson		
Mr.	I. Stocklet	Mr.	T S Watson		
Mr.	David Storrock	Mr.	Neil Watson		
Mr.	William L. Stott	Mr.	Brian Watson		
Mr.	D.F. Stover	Mr.	Alexander Watson		
Mr.	Eric Strake	Mr.	Murdo Watson		
Mr.	Hugo Straker	Mr & Mrs	D. Watson		
Mr.	R. T. C. Straker	Mr.	Roddy Watt		
Mr.	C. S. R. Stroyan	Mr.	David Watt		
Judge	R. A. R. Stroyan QC	Mr.	Gerard Watts		
Mr.	Colin Styles	Mr.	Richard Watts		
Mr.	John Sully	Mr.	Duncan Webster		
Mr.	Colin Surman	Mr.	D. Wedderburn		
Mr.	B. H. Surtees	Mr.	Raymond Weir		
Mr.	Douglas Sutherland	Mr.	J. Welch		
Mr.	G. Sutherland	Mr.	C. R. H. Wells		
Mr.	Alasdair Sutherland	Mr.	Gerard Wessern		
Mr.	Ian Sutherland	Mr.	R. K. Westmacott		
Mr.	Jim Sutton	Mr.	Roger Whewell		
Mr.	D. R. Sutton	Sir	Jack Whitaker		
Mrs.	J. D. Sutton	Mr.	Richard White		
Mr.	John Sweeney	Mr.	John White		
Mr.	W. R. Sweeney	Mr.	R. White		
Mr.	John Swinton	Mr.	Allan White		
Mr.	A.W.G Sykes	Mr.	Jeff Whitehead		
Mr.	John Syme	Mr.	Paul Whitehead		
Mr.	Stuart Symmers	Mr.	G. Whitelaw		
Mr.	Stewart Talyor	Mr.	A. C. Whitmore		
Mr.	Kenneth Taylor	Dr.	John L. G. Wight		
Mr.	John Taylor	Mr.	John Wignall		
Mr.	A. Taylor	Mr.	D. Williamson		
Mr.	Fred Taylor	Mr.	David Willard		
Mr.	David Taylor	Mr.	Alun Williams		
Mr.	David Taylor	Ms	Sue Williams		
Mr.	William Taylor	Mr.	J. S. Williamson		
Mr.	Tony Taylor	Mr.	James Williamson		
Mr.	Kirk Taylor	Mr.	Robert Williamson		
Mr.	Niall Taylor-Duncan	Mr.	I Wills		
Mr.	W. Temple	Mr.	F. H. P. H.Wills		
Mr.	Kenny Thomson	Mr.	Peter Wills		
Mr.	R. J. Thomson	Mr.	Graeme Wilson		
Mr.	David Thomson	Mr.	Alastair Wilson		
Mr.	J. Thomson	Mr.	Andrew Wilson		
Mr.	Q. B. Thomson	Mr.	Q. E. Wilson		
Mr.	Richard Thomson	Mr.	Kenny Wilson		
Mr.	J. Thomson	Mr.	Alexander Wilson		
Mr.	John Thomson	Mr.	A. Wilson		
Mrs.	Fiona Thomson	Mr.	Andrew Wilson		
Mr.	Iain Thornber	Mr.	William Wilson		
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Mr.	S. W. Threipland	Mr.	Simon Winton		
Mr.	James Tod	Mr.	Ben S. P. Wong		
Mr.	Steven Todd	Mr.	Charles Wood		
Mr.	Colin Toulouse	Mr.	David P. Wood		
Mr.	G. Towell	Mr.	Michael Wood		
Mr.	Robert Townsend	Mr.	Alan Wright		
Mr.	H. P. Trotter	Mr.	Patrick Wright		
Mr.	Brian Troup	Mr.	Chris Wright		
Lord	Tryon	Mr.	Richard Wright		
Mr.	Albert Tulloch	Mr.	John Wrightman		
Mr.	J. Turnbull	Mr.	John Wykes		
Mr.	Trevor Tyler	Mr.	Kevin Yates		
Mr.	D. Urquhart-Dixon	Mr.	M. H. Yeats		
Mr.	Annette Usher	Mr.	B. A. Yeowart		
Mr.	H. G. Usher	Mr.	Ian Young		
Mr.	Danvers Valentine	Mr.	G. Young		
Mr.	Ronald Van Oyen	Mr.	Gordon Younger		

## Summary of Responses to the DCS Consultation on Close Seasons March 2005

### APPENDIX 2 Acronyms

<b>ADMG</b>	Association of Deer Management Groups
<b>ACPOS</b>	Association of Chief Police Officers in Scotland
<b>BASC</b>	British Association for Shooting & Conservation Scotland
<b>BDS</b>	British Deer Society
<b>DCS</b>	Deer Commission for Scotland
<b>FCS</b>	Forestry Commission Scotland
<b>JMT</b>	John Muir Trust
<b>NFUS</b>	National Farmers Union Scotland
<b>NGO</b>	Non-governmental organisation
<b>NTS</b>	National Trust for Scotland
<b>RICS Scotland</b>	Royal Institute of Chartered Surveyors in Scotland
<b>RSPB</b>	Royal Society for the Protection of Birds
<b>RTAs</b>	Road traffic accidents
<b>SAC</b>	Scottish Agricultural College
<b>SACS</b>	Scottish Association for Country Sports
<b>SCA</b>	Scottish Countryside Alliance
<b>SGA</b>	Scottish Gamekeepers Association
<b>SNH</b>	Scottish Natural Heritage
<b>S/NVQ</b>	Scottish/National Vocational Qualification
<b>SRPBA</b>	Scottish Rural Property and Business Association
<b>SSPCA</b>	Scottish Society for the Protection of Cruelty to Animals