



# SACS

UK-WIDE SHOOTING  
& COUNTRY SPORTS  
ADVOCACY

## SACS - WORK UPDATE: APRIL 2019

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**No other organisation in our sector achieves so much with such a small dedicated staff team.**

**This update is a just a brief snapshot of our work, outlined so members know how their money is being spent.**

**We have deliberately left the firearms section to the end – everyone knows SACS excels in firearms advocacy, but we wanted to emphasise the sheer breadth of the other important work we do on your behalf as well.**

Please help us to help you by continuing to support SACS and renewing your membership on time. Without you, none of this work happens.

## ARDMOOR DISCOUNT CODE

We're very pleased to announce that [Ardmoor](#), the excellent online shop for fieldsports and outdoor clothing, equipment and supplies has offered SACS members **15% off all purchases!** The Ardmoor team are friendly, efficient and provide first-rate products and customer service; we're very happy indeed to partner with them. Whether you fish, stalk, shoot, work dogs, sail, farm or do gamekeeping, Ardmoor have a huge range available. Contact the office to get the current online discount code.

## NATURAL ENGLAND GENERAL LICENCE REVOCATIONS

As all of you will no doubt be aware, this week (3<sup>rd</sup> week in April) Natural England revoked the principle General Licences in England for controlling pest bird species. This followed a legal challenge by a bunch of anti-shooting activists led by Chris Packham.

More detail on this below. But linked below is a statement from Alex on what happened and our concerns about the wording of the new GLs and deep suspicion over what happened last week:

### [SACS STATEMENT ON GENERAL LICENCES](#)

In law ALL wild birds are protected. General Licences are issued by each of the national administrations (Scotland, England, Northern Ireland and Wales) as a derogation from the law to allow control of pest wild bird species in certain circumstances. In earlier newsletters and over many years, SACS has informed its members about General Licences - what they mean and what you have to do. Basically, there are General Licences for a variety of species and purposes e.g. conservation, crop damage etc. The licences are free and open to all. All you have to do is read the licence(s) relevant to you, and follow any attached conditions. No application, just read it and follow it.

SACS, with many members in England, has been working flat out on this Natural England issue. We have responded to an exceptional number of messages and calls asking for help and direction, provided constant updates on the SACS website news page, Facebook and Instagram (where so many access information now) and worked behind the scenes with key senior members to get this resolved quickly.

Apparently Natural England had for 8 years incorrectly issued its General Licences, contrary to the Wildlife and Countryside Act. In the face of the recent legal challenge, Natural England felt they had no choice but to immediately revoke the licences and seek to reissue new ones in a legally-correct manner.

We understand new General Licences will be issued from Monday 29<sup>th</sup> April. If you live in, or control birds in, England and need to get on with your control between now and the new licences being issued, there is a way of applying for a temporary licence. Please go to the link below and download the SACS information document - all the information and links [here](#).

If you do not need to control bird pests between now and next week, then you do not need to do anything. Just wait for the new General Licences to be issued (we will put up links on the SACS news page as soon as we have them next week).

### **MEMBERS IN SCOTLAND, NORTHERN IRELAND AND WALES ARE NOT AFFECTED - UNLESS CONTROLLING PEST BIRDS IN ENGLAND**

SACS works hard across the UK, but if there is one single working example of an organisation that pulls its finger out to help members when things go pear-shaped, then this is it. Due to the volume of

calls and the seriousness of this issue, senior members of our team have hardly seen their beds for two days. No fault can be apportioned except to Natural England and, when this is done and dusted, there needs to be a review on what went wrong and why.

Please always **check the SACS news page** for updates. We have had a few calls to ask what SACS is doing, when all the information is easily available on our [website](#).

## SACS NEWSLETTER AND UPDATES

A constant question here at SACS has been what to do with a magazine or journal. In 2014 we asked members if they wanted a glossy magazine and the majority feedback was 'no', a newsletter was sufficient and since then we have tried a number of options, being wary that production costs, time input, overheads and mailing charges take away money from the rest of our work.

The other obvious issue is that as soon as a newsletter or journal is printed, it can be out-of-date on important matters, particularly at a time when we have never been busier on advocacy work. We don't want members to act on obsolete information.

So, we now issue this online newsletter that is updated more regularly and, to the best of our ability, is timely and accurate. There is just so much activity and work ongoing that this seems the most sensible option. Members are able to access the newsletter from our website homepage and news section, but as each new version is published we will email or text the link to you. Anyone not online can call the office to request a printed copy at no charge.

## MEMBERSHIP RENEWALS

We have a new notification system in place where, as well as posting out notification of your pending renewal, we will also text and/or email notification as well. That said, quite honestly, we find that email reminders are nowhere near as successful as text reminders.

So, if you can, please ensure that we have your correct mobile phone number. We will only text for three reasons – membership renewals, news updates or if something comes up where we need members to get involved e.g. an important survey or Government consultation.

Of course, if you enrol by **Direct Debit** then that makes life so much easier for you and SACS. You don't have the regret ex-members have had when a claim or licensing matter has arisen, but they had forgotten to renew membership. That's quite a regular issue, hence why we send out so many reminders!

Direct Debit is easy; just fill out the short form you get with your renewal pack, date it, sign it and post back to us in the enclosed prepaid envelope. And by joining by Direct Debit, because it takes a couple of weeks to set up, we give you two extra months' membership for free.

And, should you be moving to Australia or taking up golf instead, cancelling a Direct Debit is easy too; just contact us and we'll remove your details immediately.

Running a **not-for-profit** association such as SACS is not easy. We are always working at maximum effort on limited resources, the hours long, the work diverse and often frustrating and the successes often of a confidential nature that, to maintain behind-the-scenes working relationships, we cannot shout about. Please help us to do more for you by renewing on time and especially by considering Direct Debit. SACS is a family; by thanking you for support we are really just thanking each other. There's no 'them and us' like elsewhere, just 'us'.

## ATLANTIC SALMON TRUST

SACS supports the vital research work of the AST, and we have lent our formal backing to the Trust's Missing Salmon Project. Without robust evidence on the multiple causes of the salmon population

crash, legislators are unlikely to listen to our community's calls for action on predator control, aquaculture and habitat management. Contact the office to receive a copy of the latest Project booklet.

## SACS BLOG

The SACS blog is usually published every two weeks, and ranges from fieldsports stories, calls to action and honest kit reviews. Click [here](#) to read more.

## TROPHY HUNTING: GOAT GATE

Members will remember the Islay Goat Gate incident and SACS' viral [response](#). As we warned, the irresponsible and immature actions of the 'hunter' in question, who does not have to deal with our politicians because she lives abroad, led to ScotGov reviewing the operation of the laws governing wildlife management. SACS was invited by ScotGov to join a stakeholder task group to draft a voluntary 'code of practice' for large mammal hunting activities. The first meeting has now taken place, with discussions placing an emphasis on explaining why an animal in a photograph has been shot so that non-hunting viewers understand what has happened and why. The next meeting is due in May, to be followed by a working group on relevant legislation; yes, ScotGov still wants to look at legislation to see if it is strong enough. SACS is taking a robust and proactive stance on this issue. We will keep members updated as matters progress.

## BRITISH GAME ALLIANCE

The new UK game meat marketing board that aims to deal with feathered game supply and demand issues, as well as consistency and publicity for game meat consumption. SACS actively supports the BGA and is fully engaged with BGA leaders, providing feedback on its shoot Standards and ways of working. We are a member of the BGA's Advisory Committee, and were instrumental in the BGA's recent feedback survey as a direct result of SACS members contacting us with criticisms (we listen, we act!). We recently wrote to all our club and syndicate reps to ask them to join up their shoot; you can do this by clicking [here](#). **IF YOU ARE STRUGGLING TO SELL YOUR GAME, PLEASE CONTACT THE BGA FOR ASSISTANCE AND TELL THEM YOU ARE A SACS MEMBER.**

## CODE OF GOOD SHOOTING PRACTICE

Members are reminded of the importance of following the SACS-endorsed Code of Good Shooting Practice. No doubt many of you will be aware of allegations of pheasant carcass dumping and related poor practices; there is no excuse. SACS' recently met with other CoGSP partners to discuss content and implementation. The Code can be accessed [here](#). We continue to work with partners to showcase the positives of shooting and good practice.

## SCOTTISH FORUM ON NATURAL CAPITAL

SACS is pleased to have been accepted as a member of Scotland's [Forum on Natural Capital](#), the only current fieldsports representative on the Forum. Scotland's wild game, deer and fish populations are a very important part of our natural capital, and SACS will be able to provide our expert perspective on relevant issues to the Forum's work.

## BROWN HARES

SACS has been publicising the work of our Gamekeeper member Jonathan Davis supporting brown hare disease investigation currently being carried out by academic staff from the University of East Anglia; you can read more [here](#). Jonathan has been travelling the length and breadth of the UK to collect hare carcasses for Dr Diana Bell's research, in order to establish the identity and extent of

pathogens in hare populations that were previously unknown in the UK. Clearly, the wider consequences of pathogens such as RHDV2 jumping from rabbits to hares are catastrophic. We thank Dr Bell and Jonathan for their ongoing work. While the research continues, we support the call for voluntary restraint when managing hares, especially in areas where hare numbers are obviously lower than usual.

## DEER WELFARE AND MANAGEMENT

SACS sits on the Deer Management Round Table, which is a strategic policy forum for deer management issues, and Lowland Deer Network Scotland. We also sit on the Wild Deer Best Practice Steering Group, which is currently working on updates to existing Scottish, English and Welsh Best Practice documents and delivery of new ones. SACS has an experienced and capable Wild Deer Expert Group and takes an approach based on two tenets: our members' interests and genuine deer welfare.

To this end, SACS has recently sought a more proactive relationship with Forest Enterprise in regard to greater community access to deer management opportunities. We have also recently led clarification of roadside dispatch insurance for the sector. In addition, we help deer stalking syndicates with leases, and firearms or firearms licensing-related matters.

There is a lot happening in the deer world. SACS is an organisation with extensive staff and committee deer management experience and one that vigorously stands up for deer and deer managers against politicians and environmental do-gooders. A classic example is the constant single-species focus on deer; it is the long-held view of SACS that Deer Management Groups should be part of wider landscape-scale management groups covering everything from ecology to industry to renewables to human communities dependent on the land. Bigger issues require bigger thinking and broader engagement; SACS sits at the heart of that advocacy for our members.

## SACS SYNDICATE AND CLUB SUPPORT

SACS has a large and ever-growing number of syndicates and clubs within our membership. These cover a broad range of interests from game shooting, terriers, falconry, ferreting, air rifle and pistol, deer stalking, clay shooting and angling. It is a welcome indicator of the health of our way of life that the syndicate and club sector appears to be strong, although we do need far more young people getting involved, and we don't just mean juniors. SACS believes it is much more effective to invest in young adults i.e. the next generation of parents and young parents, than juniors by themselves.

SACS provides syndicates and clubs with excellent public liability insurance, but we also help many with lease and legal queries, firearms guidance for their members and a level of personal support and service for syndicate and club officers that cannot be matched elsewhere. Our genuine, friendly approach really matters and we know only too well how challenging and thankless it can be to run a syndicate and club. We are here to make life easier where we can.

In the past few months, SACS has helped with more syndicate and club queries and calls for guidance than ever before. Whether it is shooting rates, trying to understand or negotiate a lease or perhaps even asking for our help to find new members for the group, then please just get in touch.

## ENVIRONMENT AGENCY – SALMON CONSERVATION ENGLAND

SACS responded to the public consultation on proposals for new National Salmon and Sea Trout Protection Byelaws. The Byelaws came into force on 1 January 2019, after an initial postponement following the consultation outcome. The EA wrote to us to clarify their position on some of our concerns, and to set out what amendments had been made to the Byelaws as-adopted. Visit the SACS news [page](#) for more information.

## BEAVERS IN SCOTLAND

SACS responded to the ScotGov consultation on the Beavers in Scotland Strategic Environmental Assessment, and whether potential impacts of beavers and appropriate mitigation measures have been correctly identified. Responses to this consultation have now been analysed and published, with beavers granted European Protected Species Status from 1 May. SACS has also been engaged with SNH on the suite of management and mitigation measures to be made available to land managers dealing with negative beaver impacts, which should include lethal control where necessary. Though this is an issue affecting only a small number of our members directly, it was important for us to give those members a voice. If you have any beaver-related problems (of the *Castor*-variety!), please get in touch.

## FERAL 'HAIRY' PIGS

We still await the Scottish Government's decision on feral pig management, having submitted our views via SNH back in 2016. The subject of 'hairy pigs' is on the National Species Reintroduction Forum agenda, of which SACS is a member. As and when more detail emerges on Scottish Government's position on hairy pigs, then we will be in touch with our members. It is a policy area that needs to be absolutely correct on your behalf. Read this SACS guest [blog post](#) to learn more about boar management.

## REVAMPED FIELDSPORTS MAGAZINE

Fieldsports Magazine has been bought by the Fieldsports Press, and is now a high-quality journal-style smorgasbord of fieldsports commentary, information and photography that won't end up in your recycling box after a few days. SACS' Director of Policy continues to write a regular feature; of all the magazines available for our community, this one is really worth your attention.

## COUNTRYMAN'S WEEKLY

SACS has begun making contributions to the Countryman's Weekly. This is a real vote of confidence in our work and commitment and we look forward to sharing views, concerns and ideas. It has been said by a number of you that you take pride in SACS being a 'straight-talker', which is true. Although polite and courteous, we are not in the habit of surrounding issues with cotton wool. It is best to say it like it is, and we started with the 16 January edition, providing readers with an [introduction](#) to our work.

## FORESTRY COMMISSION

SACS has met with FC Scotland to discuss ways to work together on common policy issues, relating mostly to wild deer and habitat management. This is a still-developing area, and we will update members when more information is available.

## FOREST ENTERPRISE

Forest Enterprise is the operational arm of Forestry Commission Scotland. Many FE staff, contractors and recreational deer management permission holders are SACS members and there is a consistent theme in all our discussions – concern about the future of **sustainable** deer management on the National Forest Estate.

SACS has been attempting to move FE's deer management out of the community engagement dark ages for several years and has been exploring our vision for community-focused deer management initiatives. Following on from earlier meetings and correspondence, we await our next FES meeting and will continue to press our case for a more sustainable way forward for deer management on the National Forest Estate.

More information on this deer issue and the SACS' perspective on the future of sustainable deer management will be available via a new blog, to be published soon.

## GENERAL LICENCES

Remember, wherever you live in the UK, if you are carrying out any control of bird species that is permitted only under General Licence for your region, you must have read and understood the relevant GL for the activity you are undertaking. This is your responsibility, and it is the law. If it is not for a clear purpose stated in a GL e.g. crop protection, then you are on wobbly ground. In 2016, SACS proposed a new GL format that was subsequently adopted by SNH. We expect SNH to launch a GL review later in 2019; Natural England are also planning a review (a separate issue to the current debacle), and in both cases we will keep members updated and ask for your GL feedback. If you're really keen you can email your thoughts now to [info@sacs.org.uk](mailto:info@sacs.org.uk).

Elsewhere in the UK, the relevant authorities issue their own versions of the GLs. You can find the links to the host webpages [here](#), and you should check that you are reading the latest version of the licence you require.

## INDIVIDUAL SPECIES CONTROL LICENCES

Problem cormorants? Rogue ravens? If you need to apply for an individual control licence to deal with a protected species, and you can provide hard evidence as to why lethal control is necessary, please apply to SNH, Natural England, Natural Resources Wales or DAERA (NI), or contact SACS to help you with your application. SACS has successfully assisted members who felt that they had no hope of a licence being granted. As one example, SNH have told us that they will consider all properly-evidenced applications, and it helps the case for active management of such species when more applications are submitted. Help us to help you.

## LANTRA COURSE CONTENT CONSULTATION

The leading awarding body for land-based and environmental training courses and qualifications, Lantra have sought SACS' input on a number of game sector qualification reviews. Ensuring that education opportunities are up to scratch for our young folk and new entrants – our future – is truly vital work.

## SCOTTISH GOVERNMENT REVIEW OF GROUSE MOOR MANAGEMENT/LICENSING

The Werrity Review into the management of Scotland's driven grouse moors, and the call to introduce statutory licensing, is due to report in mid-2019. SACS was invited by the Review group to respond to a 37-point questionnaire, to which we submitted an objective and thoroughly-researched 13-page response in September 2018. As one of our members, who was asked to review our draft response before submission, said: *"Not many folk could've written a response as competent as that."* If the group proposes legislative change, we are informed that a public consultation will be launched before the Minister makes her final decision.

## LYNX REINTRODUCTION

On 4 December 2018, the Secretary of State announced his decision to refuse the proposed trial reintroduction of lynx by the Lynx UK Trust. SACS, frustrated by the media showboating dominating the public narrative of this potentially disastrous proposed trial, submitted our serious and evidenced concerns directly to Natural England and Defra, which were acknowledged 'with great interest.' We are certainly pleased that the Government has listened to key stakeholders including SACS, and you can read more about the SoS' sensible and evidence-based decision [here](#). Though the

pro-lynx lobby are still gaining press coverage, any proposed reintroduction or trial must be approved by the Government: an outcome that remains extremely unlikely at the present time.

## MOORLAND FORUM

SACS remains an active member of the Moorland Forum, working on both the Principles of Moorland Management Steering Group and the new Uplands Vision Task Group. The leading cross-stakeholder group for upland management issues, we encourage members to visit the Forum's website and to please read the PoMM documents [here](#).

## NATIONAL ACCESS FORUM

We are a corresponding member of this Forum, and monitor Forum activity and documents for issues of relevance to our members. SACS attended the May 2018 meeting to co-present the Working for Waders initiative to groups including the British Horse Society, Ramblers Association, Police Scotland and Mountaineering Council. The presentation was a call to action for recreational users of the countryside to avoid disturbance to waders in the breeding season, part of our work on the Raising Awareness group of this cross-stakeholder conservation project.

## PARTY POLITICS

At any one time, SACS is engaged with a number of MSPs, MPs and party staff on issues ranging from hunting with dogs, firearms legislation, and afforestation to wildfowling and social media.

## NORTHERN IRELAND

SACS is currently actively assisting members with a significant number of firearms applications, variations and potential appeals and is engaging with PSNI FEB in relation to 'good reason' and land inspections. We are aware of a number of challenges presented by members in NI and look forward to taking these forward with FEB. These challenges include applications for similar banded rifles where one is to be used with dedicated night observation devices such as night vision or thermal scopes. This is an ongoing challenge.

It is not helpful that the PSNI Firearms Forum has now ceased to exist. Where there is disagreement, forums such as this are a useful tool in facilitating progress. Egocentric and aggressive posturing does nothing to help shooting advocacy.

We'll be at the NI Countrysports Fair at Scarva at the end of May (25<sup>th</sup> and 26<sup>th</sup>); please come and see us then.

## WALES

Following the insupportable decision of the Welsh Environment Minister to prohibit the leasing of pheasant shooting rights on Welsh public land, SACS wrote to both the Minister and Natural Resources Wales to call-out their dangerous, authoritarian approach to government and land management. Prior to this, we had been involved with the NRW firearms review from its outset and submitted a robust response to the public consultation on the original – and sensible – options that NRW had planned to adopt before the Minister's intervention. We remain committed to fighting for our members' rights as well as those of the whole fieldsports community. After all, divided we will fall.

In addition, we are aware that the University of Wales is currently reviewing its estate management of its Gregynog Hall site, which includes a lapsed lease to Bettws Hall. As members will know already, SACS is a not-for-profit that engages directly with national issues on behalf of our membership, but intervenes in local threats only when members request this. No members have asked for our

assistance with this site-specific issue to date, but if any SACS members are affected by the University of Wales' ongoing review, please get in touch immediately.

## SCOTTISH GOVERNMENT PIKE CONSULTATION

As part of the Scottish Government's Wild Fisheries Review process, SACS had previously highlighted the vulnerability of pike populations to over-exploitation. We were pleased to see the launch of a public consultation on pike conservation measures, to which we responded in August 2018. Public responses to the consultation have now been published, and we await Marine Scotland's response; we are informed that this will be forthcoming during 2019.

## SCOTTISH GOVERNMENT SALMON FARMING INQUIRY

The Committee has now published its [report](#) and ScotGov has issued its [response](#), which represents progress but does not go far enough in our view. The SACS Wild Fisheries Expert Group (WFEG) submitted robust and comprehensive responses to both the 2018 ECCLR Committee's inquiry into the environmental impacts of salmon farming and the related REC Committee's broader inquiry into aquaculture. Our submissions are available to read on the Scottish Government's website. SACS has a high level of competence and scientific understanding, which we use to help represent members' interests; we met with Marine Scotland in mid-2018 to discuss our ongoing advocacy work for wild fisheries and ways to maximise our effective engagement with legislators. This engagement is ongoing.

## FISHERIES MANAGEMENT SCOTLAND (FMS)

SACS Wild Fisheries Expert Group Member Will Marshall, and the Group's convener/SACS Director of Policy Julia Stoddart recently met with Dr Alan Wells, the CEO of [Fisheries Management Scotland](#). They discussed the threats facing Scotland's wild fisheries, particularly the Atlantic salmon, and ways in which FMS and SACS can work together to help the greater good.

## THE GOOD FOOD BILL

SACS was the only fieldsports organisation to submit our food priorities to Nourish Scotland's Kitchen Table Talks campaign in 2018, and of course we placed a firm emphasis on local game meat. The Scottish Government announced a [public consultation](#) on its proposed Good Food Nation ambitions, and SACS responded making the case for game meat and venison to become a regular part of diets for people of all walks of life, right across Scotland.

## HUNTING WITH DOGS

Members may already be aware that Environment Minister Mairi Gougeon has now made her long-delayed statement on the use of dogs in fox control. In a disappointing display of party politicking, she announced a plan to restrict the number of dogs to two, copying the inept and scientifically-unsound English legislation and ignoring clear evidence paid for by Scottish taxpayers. You can read our initial response [here](#).

SACS submitted an intelligent, strategic response to the Bonomy consultation and we met with the Minister in October 2018, where, using case studies from our members, we explained the facts of fox control in Scotland and why it is imperative that a full pack and option to use terriers is kept lawful. Although the Minister expressed genuine interest in learning about why foxes are controlled and how this control is most efficiently carried out, evidently her party's minority position in Holyrood has been leveraged by the animal rights-dominated Green Party, resulting in the proposed cap on hound and terrier numbers. We were pleased, though, to hear that our intervention with the Minister in October has resulted in a proposed new licensing scheme where use of multiple dogs will

be permitted under certain conditions (for example, terrain constraints and if no other form of fox control can work in the location). This is an excellent example of SACS members having a direct impact on politicians' decisions. Thank you to those of you who helped directly with this work.

Following the Minister's statement, we met with her senior civil servants to discuss the timeframe for change, and what the changes will look like in practice. Much is still to be decided, but the SACS community will be consulted as the new primary legislation progresses. For now, it is business as usual in Scotland for the use of hounds and terriers in lawful fox control.

Our latest update is that, with the input of the Scottish Countryside Alliance, we drafted an advocacy guidance document for the other shooting and fieldsports bodies to use when lobbying politicians; this ensures that we are all pushing the same message. In addition, we have created an email template for members to use to contact their MSP, which you can find (and please use!) [here](#). Finally, the Minister has contacted our Director of Policy to ask for a meeting to discuss ScotGov's proposals; we will update members in our next newsletter.

In other fox control news, SACS was a significant contributor and driving force in the new Code of Practice for mounted packs, which, despite many meetings and workshops, has yet to be launched formally by Scottish Government though it has been adopted by hunts during the current season. Our thanks also to Barrie Wade of the National Working Terrier Federation for his support and collaboration with SACS throughout this process and in previous years.

## SCOTTISH LAND COMMISSION (SLC)

SACS met with the Chair of the Scottish Land Commission shortly after he commenced his appointment, in order to reinforce the importance of fieldsports to Scottish land management. With our professional qualifications, experience and contacts, SACS is best placed to advocate for our members' rights. SLC CEO Hamish Trench has very kindly contributed a guest SACS blog, which you can read [here](#).

## CROWN ESTATE

SACS has previously met with senior representatives of the Crown Estate to reinforce the importance of wildfowling. The discussion was positive and forward-looking with an acceptance that a community-focused approach to wildfowling advocacy should be an over-riding aim. This meeting follows significant work by SACS at Findhorn and Caerlaverock to mitigate threats to wildfowling, although quite different in both cases. SACS continues to reach out to partners and Government agencies to ensure our members and their activities are fully and competently represented.

In Scotland, the CE has recently run a [consultation](#) on its rural assets, but which excluded the foreshore (i.e. wildfowling) from its remit.

## FINDHORN WILDFOWLING SAGA

A new negotiation between both local wildfowling clubs, BASC, SACS, local representatives and those who take issue with the current situation with Findhorn Bay wildfowling has been underway for some time.

Over the last few months a professional negotiator was employed at significant cost to Moray District Council to try and find a collectively-supported way forward. This was largely a waste of time and resource, and what occurred was in Alex's view one of the least competent professional negotiations he has been involved in. Trust between the various parties and the negotiator was at best tenuous and, by group consensus, the contract was not continued beyond the initial term.

However, there are two positives: parties are on better speaking and working terms than ever and we now have a shiny new and highly competent community engagement officer helping us to go forward.

The next stage is a consultation phase on how to go forward. We will be reaching out to all members with an interest in Findhorn. If you are not on the Findhorn Wildfowling & Conservation Facebook page, then please get in touch with SACS and register your interest. The areas for consultation need to be fair and proportionate to what we are trying to achieve.

Throughout this Findhorn process, which goes back to early 2016, SACS has effectively engaged with its constituent members. Our position is driven only by member engagement and genuine representation, which, hopefully, as well as the nice new lanyards, is why you continue to be a member of SACS. Members first - always.

## CAERLAVEROCK WILDFOWLING

In 2018 Scottish Natural Heritage (SNH) announced a ban on duck shooting, punt gunning, and territorial restrictions on other wildfowling at Caerlaverock nature reserve. This was on the back of zero effective engagement with local wildfowling and representative bodies. SACS robustly challenged these proposed restrictions and pushed for a meeting between SNH and wildfowling representatives.

A number of meetings and online communications then took place, the consequence of which was that SNH was forced to back down on all points. They simply could not evidence their concerns and the only real issue left on the table was a lack of resources for wardens. Public funds are tight, SNH is cash-strapped and we all needed to find a more community-engaged way forward, which is exactly what happened.

So, the positive result of these detailed negotiations is that wildfowling restarted at Caerlaverock, permits were issued, duck shooting was not been banned, punt gunning was not banned and both local wildfowling clubs are successfully helping SNH with voluntary monitors – system that is working well.

Lessons for Findhorn? Perhaps, but Findhorn is a vastly different issue with far more stakeholders and in a much tighter geographical area with closer proximity to homes and divergent interests.

## SNH: Wildlife Management Principles

Despite the challenges at Caerlaverock (see above), SACS is recognised by SNH as a collaborative, forward-thinking organisation that acts with integrity and genuine care for our members. And for its part, SACS consistently reaches out to SNH on a wide variety of relevant matters and enjoys productive working relationships with the majority of its staff.

SACS engages regularly with senior SNH wildlife management staff to discuss relevant issues and opportunities for improvement. This kind of effective dialogue between government agencies and advocacy groups such as SACS is vital for our future.

Recently, SACS met with SNH's senior wildlife team to discuss work towards a set of collaborative wildlife management principles; SNH sought input from the 'key players' (their words) in the Scottish wildlife management world, and they know that SACS provides both an innovative way of thinking and the grassroots representation of our membership for which we are rightly renowned. A further meeting between partners is planned to discuss the revised draft of this wildlife management principles document and SACS will continue to represent its members in this and all other vital policy matters.

Also, upcoming is a consultation on the General Licences for 2020, which we will update members on this when we know more.

## SCOTTISH RURAL ACTION: THE 'SCOTTISH RURAL PARLIAMENT'

The only active fieldsports member of SRA, ScotGov's one-stop-shop for engagement with rural Scotland, SACS is part of SRA's post-Brexit rural policy task group as well as participating more generally in the body's work. Two of our management committee members attended the most recent Parliament event in Stranraer, attended by MSPs as well as stakeholders from across the nation. If you are not involved, your voice cannot be heard; we encourage SACS members to [join](#) SRA as individual members.

## SEPA FINFISH AQUACULTURE CONSULTATION

SEPA has consulted on evidence-based proposals for a revised regulatory regime, as part of its new Finfish Aquaculture Sector Plan. SACS responded via our Wild Fisheries Expert Group, and we will let members know when SEPA publishes its response. In the meantime, you can read the consultation documentation [here](#).

## SHOOTING RATES

SACS' request for the Assessors to make sure that sporting tenants are able to contribute to the information gathering process that informs rates valuations was agreed; we have been working directly with the Assessors since 2016. In addition, we are a member of the shooting rates advisors' forum led by SLE that is doing excellent work now that shooting rates has moved into the appeals stage. Over the past two years, SACS has provided extensive competent guidance to a large number of members throughout the rates process, and we still continue to do so at the time of writing; please call the office if you are struggling, particularly as issues such as reliefs continue to evolve.

## SCOTTISH WILDCATS

SACS is a member of the new land managers' stakeholder group, established this autumn by Scottish Wildcat Action/SNH. The group aims to establish a protocol for gamekeepers and others who are involved in lethal control of feral cats, with the aim of ensuring 'wildcat friendly' predator control. The protocol is being trialled during 2019 with a view to finalising the document at the end of this year. Contact the office for more information or to get involved.

## WORKING FOR WADERS

A cross-stakeholder initiative that aims to halt and reverse the decline in breeding waders, SACS is an active member of the Raising Awareness project sub-group. We have written publicity articles for the initiative that have been published in the RICS Land Journal, Shooting Scotland and Fieldsports Magazine, as well as a news piece on BBC Alba and an agenda section on the National Access Forum. SACS hosted the project at our Scottish game fair stands throughout the summer and will do so again in 2019. We continue to support this project, and are keen for members to participate; email the office asking for Julia, for more information.

## SPRING TRAPS LEGISLATION UPDATE

*SACS works with Scottish Government, SASA, DEFRA and other partners on approved alternatives to Fenn/Solway traps and a SASA-led technical review of snaring in Scotland. We are also engaged with SNH on proposed management changes to corvid trapping regulations. In this news update we will focus on AIHTS, stoats and spring traps. For anyone currently using Fenn-type, magnum or WCS tube traps then you really must read the information below.*

In previous news updates, SACS has mentioned the ongoing issue in regard to the Agreement on International Humane Trapping Standards (AIHTS). The UK has signed up to this agreement, which is an attempt to standardise humane trap designs. Work is ongoing to implement the standards, but has been complicated due to a number of currently popular UK spring traps being unable to pass the new tests.

Importantly, AIHTS only applies to a list of international animals commonly trapped for their fur. AIHTS species resident in the UK are beaver, marten, otter, badger and stoat, but obviously under current UK law **only stoat** may be legally trapped without applying for a licence. Mink and fox are not affected by AIHTS – so in the UK it is essentially about stoat trapping.

### **Those bloody stoats!**

The obvious difficulty in limiting which traps are legally allowed for stoats is the difficulty of preventing stoats from entering a trap set for other target species. For example, the new standards will not allow Fenn-type traps to be used for stoats, but though they could be used for rats, how would you prevent stoats from being caught, and then falling foul of the law? The consequence is that if there is potential to catch stoats, even if unintended, then you should only use those traps that are permitted for stoats.

### **Spring Traps Approval Orders**

Spring Traps Approval Orders (STAOs) are the legislative mechanisms which bring the AIHTS standards into regional UK law (being a devolved matter) whilst also having other legal restrictions for other non-AIHTS species e.g. grey squirrels, weasel etc. On the basis of AIHTS standards, Scotland, England, Wales and Northern Ireland will all be developing their own amended Spring Traps Approval Orders to clarify which traps will be lawful for use against stoats and other species. It is a bit confusing, but for simplicity what you need to know is: 1) the end date for using your current traps if they are no longer to be approved e.g. Fenns, and 2) that your new traps, e.g. DOC150, are listed in your regional STAO approval list.

The new regional STAOs will stipulate a date from which a number of currently-used traps such as Fenn-types can no longer be used, and the STAOs will also provide a list of currently approved traps. But beware: the list will still mention traps being phased out of approval, such as Fenn, and clarify the end date for their use – see following section on ‘end date’. Essentially, only those traps listed in your regional STAO should be used for trapping where stoats may be caught.

### **End date for non-approved traps**

Trappers will still be able to use the following spring traps for stoats **only until 31 March 2020** (after which it will be unlawful to use them):

- BMI Magnum 110 & 116;
- Fenn Vermin Trap Mark IV (Heavy Duty) & Mark VI (Dual Purpose);
- Kania Trap 2000 & 2500;
- Solway Spring Trap Mk 4 & Mk 6;
- Springer No 4 Multi-purpose (Heavy Duty) & No 6 Multi-purpose;
- WCS Tube Trap International.

*(The above traps either did not pass the new tests or the manufacturers were unwilling to invest in their approval)*

The following spring traps will be removed from the STAO altogether, so you can't use them at all:

- Fenn Vermin Trap Mk I, MkII & MkIII
- Imbra
- Juby

- Lloyd
- Sawyer

As a positive, the new STAO approval lists will include some new and innovative traps such as the **Tully Trap** for stoats, weasels and rats and **DOC traps** in tunnels (though not for grey squirrels). For grey squirrels a new trap is approved called the **Goodnature A18**, which though not exactly cheap and a bit of an odd-looking thing, is reported to be very effective and enduring.

For those of you who trap stoats or operate traps in stoat areas, and that will be many of our members, we would recommend looking at the Tully Trap as a replacement for Fenn type traps.

The Tully is British gamekeeper-designed and reported to be simple, strong and effective. More information [here](#) (YouTube video: [https://www.youtube.com/watch?v=gKA7IWm\\_tI4](https://www.youtube.com/watch?v=gKA7IWm_tI4))

SACS-supportive [Game and Country](#) is the current listed retailer and is currently taking orders. The price is around £31 before VAT. If you are using Fenn-type traps you do have until 31<sup>st</sup> March 2020 to continue using them and it is really up to you which trap you wish to invest in.

### **Regional STAOS**

Spring Trap Approval Orders had to be effective in Scotland, Wales and Northern Ireland by the end of March 2019, as the Humane Trapping Standards came into legal effect from the 1<sup>st</sup> of April 2019.

#### **STAO - England**

The [Spring Traps Approval \(England\) Order](#) has been drafted and came into effect on 1<sup>st</sup> January 2019. The '[Schedule](#)' includes the list of currently approved traps for England. It is a short document – please read it thoroughly.

#### **STAO - Scotland**

For Scotland, the Spring Traps Approval (Scotland) Order came into force on 3<sup>rd</sup> January 2019. Link to Order: <http://www.legislation.gov.uk/ssi/2018/389/contents/made>

#### **STAOS - Wales and Northern Ireland**

Details to come. We will update members with details of the Welsh and Northern Irish STAOS as they become available.

### **General Licence for Stoats from 2020**

Members need to be aware that the new Humane Trapping Standards Regulations make stoats a protected species from 1<sup>st</sup> April 2020. However, stoats will be allowed to be trapped via a General Licence, much the same as for corvids etc. where a crow is essentially a protected species under the EU Birds Directive and related UK legislation, but the regional General Licences grant us a derogation to control certain pest species of birds for a number of sensible purposes. And, exactly as for the bird General Licences, you will not need to apply for the stoats General Licence - all you would have to do is simply read the Stoat General Licence and follow any stipulated actions, conditions or restrictions.

### **SPRING TRAPS SUMMARY**

AIHTS is about international humane trapping standards for species commonly caught for fur.

The only practically relevant species to us in the UK is the stoat. The stoat is also a species that it is difficult to avoid catching in spring traps set for other pests.

The UK is a signatory to AIHTS, which is an international agreement. Brexit has absolutely nothing to do with this.

As these matters are devolved to regional administrations, the UK brings the AIHTS standards into legal effect via regional Spring Trap Approval Orders in Scotland, England, Wales and Northern Ireland.

STAOs permit the use of spring traps for controlling pest species other than stoats. The newly amended STAOs will list the approved traps and what species they are approved for. Though stoats will become a protected species their control will still be allowed via a Stoats General Licence.

There is a grace period for some old traps, such as Fenn IV and VI, to be continued to be used for stoats. This ends on 1<sup>st</sup> April 2020. It is advisable to start the changeover to new traps well before then.

And, because it is nigh impossible to prevent stoats from entering traps used to catch other pests such as rats, even if you are not actively going after stoats you will most likely need to use a spring trap approved for stoats. If you live in an area of the UK without stoats, such as some islands, then this may not apply.

If in doubt get in touch with SACS. Keep an eye out for our updates with further information and detail. Remember, it is up to you to ensure you are legally compliant. It is up to SACS to ensure you have access to the information you need.

Please bear in mind that these new trap types are generally much more powerful than the old Fenn-type traps. They are built to last and built to kill quickly. Practice using and setting them in good light conditions before going afield. A member of staff can attest to the fact that the DOC150 is far harder on the hand than even a Fenn Mk6. Be careful.

## FIREARMS, FIREARMS LAW & LICENSING

We leave this section until last as SACS is already well-known for its firearms law and firearms licensing work, and in the preceding sections we want to convey the breadth of our other UK-wide work for shooting and fieldsports.

As a large number of you know from personal experience, SACS is incredibly busy on the firearms licensing advocacy front and the high volume of cases across the UK, often from those members who never imagined they would ever have had a licensing problem, shows no sign of abating. So, here is a wee update on our ongoing firearms work.

### OFFENSIVE WEAPONS BILL:

#### PROPOSED .50 AND 'RAPID-FIRING' RIFLE BANS

The proposed .50BMG and High Muzzle Energy rifle ban has been shelved after strong pressure from shooting representative bodies, including SACS. It was a long and tough fight, but the Home Office was forced to back off.

SACS engaged with the proactive Fifty Calibre Shooters Association and others to help this fight. Also, SACS contacted directly every UK MP and received some strong indications of support. Lot of SACS members responded to our calls for help and this too made a really big difference with MPs. Well done to all those who responded and acted.

MARS and Lever Release Rifles (categorised as 'rapid-firers') continue to be at risk. SACS has covered this issue in previous news updates (see news section of website). The principle issue with MARS and LR rifles has been internet videos of UK gun trade journalists firing them off as quick as they can and describing the MARS as an effective "non-semi-auto semi-auto'. Not helpful.

So, the problem we now have is that, although MARS is essentially not semi-auto, some of our own shooting press have described it 'as good as a semi-auto' and, as a consequence, the powers that be have taken an active interest. And because MARS was under scrutiny and the technical specification is similar, Lever Release has followed suit and we believe there are more of them in target shooting circulation than MARS.

The Offensive Weapons Bill is currently undergoing parliamentary ‘ping pong’ from Commons to Lords. Right now it is back in the Lords. There are other parts to the Bill such as controls on acid sales and some knife sales.

## GPs AND MEDICAL EVIDENCE

In Scotland the situation with GPs and firearms licensing is much-improved. SACS has covered this topic at great length over the last few years and we have been highly active in supporting those members affected. Fully two years after this issue arose, others were still denying there was a problem at all.

Whilst there are only a few non-engaging GP practices in Scotland and a smaller number charging extortionate fees, the issue has worsened in some areas of England and Wales as police forces realise that the old system of ‘if we do not hear back from a GP within 21 days we will assume all is well’ was deeply flawed and likely to result in tragedy.

Clearly, it is not in the interests of protecting shooting sports to allow genuinely unsuitable persons to have firearms. A competent, fair and transparent medical reporting system helps to protect the future of shooting, though there is a strong argument that the current medical system actually acts as a disincentive to shooters with mental health or other serious medical issues from going to see a GP. And on that fear of going to a GP matter, SACS is working with the police, Government and sister bodies to find a better way forward - please see next story.

## “IT’S OK NOT TO BE OK”

Mental health is receiving a lot more attention these days, which SACS believes is a good thing. Though SACS is not a mental health welfare charity, we have considerable experience of handling a wide variety of ‘life events’ for our members. Perhaps because we are friendly, perhaps because our members know we genuinely care, and perhaps because firearms are often a major part of our members’ lives, we sometimes get the first cry for help from someone needing a little prod in the right direction. Sadly, sometimes, there is a tragedy to deal with from a member that SACS, their family and friends just could not reach out to in time.

Remember, mental health is exactly the same as physical ailments, which vary in severity. Some days you may be down; other days you may be able to run a half marathon backwards while singing Bonnie Dundee. Sometimes a condition is more serious and gets worse. Sometimes it has and always will ‘be there’ and sometimes it was brought on by a specific traumatic life event or events. And, at times, it just goes away altogether as life moves on. Mental health is rarely a simple case of he/she has depression and that’s it i.e. the full diagnosis in that single word. Far more often it is an identified broad condition, and a heap of words describing the context and prognosis for the individual affected.

What is constant though, is how short and precious our lives are and how much we are reliant on others to help, guide, advise and support. And, whatever the background issue, SACS will do its level best to find a sensible way forward in respect of a member’s shooting and firearms licensing, because so often that is the challenge presented to us. SACS is a grown-up and responsible representative body with experienced and able staff and a well-developed sense of social responsibility. And so it is with the wider shooting community - we care about each other and we care about the future of shooting.

Last year, the Gamekeepers Welfare Trust (GWT) approached SACS and our sister organisations to ask for our support for their work. We willingly engaged and then considered the reality that not all of our members are gamekeepers or from keeping families. SACS then took a firm decision to formalise our support mechanisms for all members undergoing mental health challenges and to

work with other bodies on the Firearms Licensing Practitioners Group, where we meet with senior police officers, Government officials, other agencies and other shooting and countryside organisations, to develop a joint approach and effective signposting to professional help for mental health matters. This work is ongoing and we hope to have a draft of a joint leaflet soon.

As a responsible community we have a duty to each other, and to the future of shooting, to not ignore any concerns we may have about ourselves or others. SACS has long-stated our reservations that the new GP reporting system would make folk avoid going to their GP in case they had guns removed. So, on top of this new mental health leaflet with signposted guidance, we are working with partners and the police to ensure that those who correctly go to see their GP are not unfairly penalised for their responsible conduct and, if anything, rewarded for being responsible by going to seek help. The police approach should be public-safety-minded, pragmatic, evidence-led and fair and SACS is working to ensure that prevails. This is one of our most important areas of work and we hope to positively report back to members soon.

Remember, it is OK not to be OK and it is good to talk. Seeking help for yourself, or another shooter you are genuinely concerned for, is your duty and responsibility as a certificate holder. Don't ignore warning signs and, if in doubt, call us or the bodies we will signpost in the new leaflet. If it's really serious and a life or lives may be at risk, then call the police straightaway.

## AIRGUN LICENSING IN ENGLAND & WALES

The Westminster Government has been exploring the airgun licensing issue again. SACS has made its own representations and attended relevant meetings at Westminster. Our vast experience of airgun licensing in Scotland and the challenges that it presented puts us in a key position to advocate against such legislation in England and Wales. It is one thing rolling it out in one Scottish police force – quite another across 43 diverse and varying licensing teams south of the border. And that doesn't even cover the principle that such legislation is disproportionate, a waste of time and resource and will only serve to disadvantage the law-abiding. SACS remains engaged with this issue on behalf of our English and Welsh members should it raise its head again.

## LEAD AMMUNITION

The European Chemicals Agency is becoming more active in its stance against lead in the environment – not just ammunition. Lead ammunition being at risk is perhaps a consequence of other bigger anti-lead issues, but there is apparent growing evidence of damage being caused by lead ammunition and there has been some talk of a 5-10 year phasing out of lead ammunition. This is a complex matter further complicated by heightened emotions on all sides of the debate. We have members who actively advocate non-lead ammunition for rifles and shotguns and others who are deeply sceptical.

Then there are simple questions, such as what is the future for .22LR? The non-lead alternatives we have tried have performed poorly. And will this affect all ammunition or just for birds and edible mammals? .243 80gr TTSX bullets are not exactly frangible vermin bullets. They do work, but backstop issues become more serious. There are obviously many other examples.

When this lead issue becomes properly 'live' we will reach out to our members for the majority view and take a direction from that. SACS will always listen to its members' views and this is a huge issue for all of us, especially those of us using old guns and unable to afford expensive non-lead shotgun ammunition, such as bismuth at £40 a box of 25. And also clay shooting and rimfire target disciplines. It is quiet on this just now, but as soon as we hear more we will be in touch.

## FIREARMS LICENSING FORUMS

SACS engages with National Police Chiefs Council firearm licensing leads and other senior licensing staff around the UK. We also provide the secretariat to the Scottish Firearms Licensing Practitioner Group. These groups and forums are an excellent and proven way of driving forward positive change in licensing practices and resolving innumerable issues to the benefit of our members across the UK. Engagement is vital; if you are not engaged you do not have a voice and without a voice you are not heard. For the majority of you, firearms licensing is an area where SACS will have its biggest influence. It is only with your support as a member that we can fight your corner, either collectively or individually.

## SCOTTISH FIREARMS PRACTITIONERS GROUP UPDATE

Last meeting held on 13<sup>th</sup> March 2019. Chaired by Colin Shedden, BASC. Secretary, Fraser Lamb, SACS.

Points covered:

- ✚ Technical action points from last meeting.
- ✚ Need for RFD for clay shooting events to be reviewed at FELWG (senior GB licensing forum).
- ✚ Club fees - Home Office.
- ✚ Brexit and firearms.
- ✚ Welfare of certificate holders (see 'It's OK not to be OK' above) - mental health sub group to be convened - meeting held on 15<sup>th</sup> April.
- ✚ Discussion on HMICS inspection report on Police Scotland firearms licensing function.
- ✚ Licensing statistics to be published annually.
- ✚ Standards to be published.
- ✚ Customer satisfaction to be included (Survey Monkey surveys).
- ✚ FEO training being refreshed with National Police Chiefs Council.
- ✚ New licensing decision-making course to be rolled out soon.
- ✚ Police Scotland have visited Northern Ireland police service to look at their new online application system. Police Scotland would like the new online system, but there are budget issues. This will be monitored and online is the general direction of travel for the future.
- ✚ Digital policing and online documentation for FEOs.
- ✚ Contentious suitability cases - significantly improved with around 250 cases under consideration at the present time, some based on outstanding court cases.
- ✚ GPs in Scotland - 98% of GP practices in Scotland cooperating. Three cases where GPs had provided incorrect information on their patient - all resolved. One GP practice in Edinburgh charging £360, but alternative practices nearby.
- ✚ GPs south of Border - Scottish situation much better than England and Wales due to delay in Statutory Guidance being issued. Chief Constables in E&W still choosing to do their own thing.
- ✚ 50,808 certificate holders in Scotland. FAC only 3,225. SGC only 24,365. Co-term 21,948. Both, but not co-term 1,270.
- ✚ 5,500 visitor permits issued in 2018.
- ✚ Air weapons certification - National AWC team disbanded and now forms part of the main firearms licensing function. Virtually no backlog - only 6 cases with suitability reports live. Circa 23,000 have now been vetted for an AWC.
- ✚ Firearms offences update to be published soon.

## EUROPEAN FIREARMS PASSES AND BREXIT

One of the more sensible things to come out of Europe was the European Firearms Pass or EFP. With Brexit, that is now in peril and Westminster has made it clear that in the event of a 'no deal' Brexit the UK would not support the EFP. Without EFPs our members will face complex challenges in travelling with firearms to other countries in Europe. The next few months are uncertain and we will keep you updated.

## WRAP UP

As well as working with our partners in other organisations on many additional important shooting and country sports issues, SACS also represents its members on national and regional working groups and panels. Proactive and positive-minded, our competent and member-focused representation is truly UK-wide.

This is proving to be another incredibly busy year for the SACS team. We are getting great feedback from members and partners; we simply could not work any harder for you, shooting and country sports.

What we ask of you is simple: please renew on time and, if possible take out a Direct Debit (forms on request). Just those two simple things will greatly reduce our admin workload so we can do even more bigger-picture work.

If in doubt about something, either check the SACS website for news updates, or call or email us.

Thank you for your support.

**[Please bookmark the web link and check back regularly for updates to this document]**

