

Friday 25th November 2011

Submission on Deer Management Policy Vision
Forest Service
Department of Agriculture, Food and the Marine
Johnstown Castle Estate
Wexford

To Whom It May Concern

Ref: Draft Policy Vision for Deer Management in Ireland

Countryside Alliance Ireland (CAI) is an expert and informed rural campaigning organisation, representing over 10,000 people throughout Ireland. We, and our members work, live and participate in recreation throughout Ireland and our interests and expertise are directly relevant to this consultation.

Countryside Alliance Ireland welcomes the opportunity to participate in the consultation process and we hope our input is valuable.

If you require additional information, or should you have any queries, please do not hesitate to contact us on 01690 3610.

Yours sincerely



LYALL PLANT
Chief Executive

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COUNTRYSIDE ALLIANCE IRELAND

Love the countryside

Draft Policy Vision for Deer Management In Ireland

A Response by:

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Introduction

Countryside Alliance Ireland (CAI) is an all-Ireland membership organisation with 10,000 individual members and over 25,000 affiliated members. We reflect the views and concerns of a broad range of rural people and their livelihoods.

Our vision of a vibrant and diverse countryside is based on the principle of responsible and sustainable use of our natural resources, coupled with local community support through meaningful consultation and proper stakeholder participation.

CAI is an associate member of FACE Ireland, recognised by the European Commission and representing 7million hunters throughout Europe. We regularly partake in, and host, conferences and forums discussing many topics relevant to the integration of country sports with sustainable wildlife management. For these reasons we have the expertise necessary to comment, for both the organisation and our members, and to make recommendations on the Draft Deer Management Policy Vision.

Firstly, we commend the Department of Agriculture, Food and the Marine, and the Department for Arts, Heritage and the Gaeltacht (DAHG) for developing a Draft Policy Vision for Deer Management in Ireland. This has been long overdue and CAI therefore supports the initiative. We would however like to see a more detailed and thorough explanation of what the Draft Policy Vision for Deer Management in Ireland literally proposes and how these proposals are to be implemented.

Within the Draft Policy, we do have some concerns and recommendations, and have outlined these below.

Desirable Objectives of a Deer Management Policy

- To obtain accurate information regarding the past and present deer population in Ireland. This should include the indigenous red deer, sika, fallow, hybrids and any sightings of muntjac deer. Only when we are aware of the present situation can we properly discuss the future policy.
- To establish a National Deer Management Partnership, that will ensure all key stakeholders are properly represented and the appropriate goals are achieved within a suitable timeframe.
- To address the increasing and alarming incidents of poaching throughout Ireland (which is particularly prevalent in the south west). Wild deer are an important part of Ireland's heritage and biodiversity. Therefore, the level of protection afforded to the species needs expanded substantially to safeguard the future of deer for generations to come.
- To cease the release or translocation of invasive and non-native species of deer into Ireland. This is vital to protect the genetic integrity of the indigenous red deer.
- To establish a comprehensive deer culling strategy.
- To review the current process of issuing permits under Section 42 of the Wildlife Act 1976 and Wildlife (Amendment) Act 2000.

- To establish an education centre for all persons involved in deer management, conservation and hunting. The aim would be to provide a comprehensive understanding of many of the key issues surrounding deer, for example habitat management.
- To review the current system of issuing deer hunting licences and therefore regain a balanced and sustainable deer population.

Recommendations

- CAI is aware a national census of deer may be an unrealistic objective. However, we would like to see some form of research undertaken. We would therefore suggest that over a minimum three year period (preferably five years), specific areas throughout Ireland are identified and a census undertaken in those areas.
- We would suggest a partnership be formed comprising of representatives of the key stakeholders, including the Deer Alliance, Wild Deer Association of Ireland, Irish Deer Society, Countryside Alliance Ireland and other country sports organisations, including IFA Countryside and the NARGC.
- Full consultation with the deer stalking community needs to be undertaken at all levels of a future policy. We are aware this may not seem realistic and therefore recommend that feedback could be received and consultation undertaken with representative bodies, such as the Wild Deer Association of Ireland, the Irish Deer Society and Deer Alliance. Deer stalkers have the advantage of extensive knowledge of both the area and the deer population within those areas and their subsequent knowledge should not be dismissed.
- A comprehensive strategy to decrease the levels of poaching in Ireland is needed. Within this we would recommend an extensive media campaign is undertaken, highlighting the damage, both environmentally and economically, that poaching causes. A point of contact should be provided for any persons wishing to report an incident; a 'poaching hotline' could be easily advertised within the media campaign.
- CAI is an active member of the poaching sub-group of PAW (Partnership for Action Against Wildlife Crime) in Northern Ireland. This initiative has proved instrumental in the fight against poaching and we would suggest a similar scheme be implemented in the Republic of Ireland.
- DAGH should be working towards increasing the penalties for poaching under the Wildlife Act 1976 and Wildlife (Amendment) Act 2000. Full liaison with An Garda Síochána must be implemented and dedicated staff should be nominated to work within their areas to increase poaching awareness and decrease incidents.
- To further protect the genetic purity of the native red deer, CAI would like to see it included on the Red list of the I.U.C.N. This would afford the red deer better protection and go some way towards safeguarding the future of this native species for generations to come.
- When establishing a comprehensive deer culling strategy we recommend that areas are identified by the levels of damage to woodland and agricultural land, and not simply by the population numbers of deer in that area.
- CAI would recommend that a tagging system is introduced to replace the existing issuing of deer hunting licenses. If properly implemented, this system would allow selective culling

and would create a more balanced deer population and ensure a diverse age of population would still be in place.

- We would further recommend that DAGH undertake regular checks of cull returns and compare that data with information provided from game handling establishments. It is our belief, cull returns can yield inaccurate information, and we would like to see this eradicated.

In addition, cull returns of any invasive species, for example muntjac, should be investigated fully by the DAGH.

Conclusion

CAI believes that an appropriate and comprehensive Draft Deer Management Policy in Ireland is justly needed and, if implemented correctly, would adequately protect the country's deer populations. However, this outcome wholly depends on full consultation and engagement with key stakeholders.

We are fortunate in Ireland to have many organisations and bodies with extensive knowledge of deer ecology, habitats and management. Our Government should therefore fully exploit this advantage and use this expertise to develop a thorough and pertinent strategy.

As a country sports organisation, CAI was pleased to see the Departments' recognising the benefits of deer hunting. These hunters provide economical, environmental and social benefits to the surrounding areas and indeed Ireland as a whole. The practice of deer hunting or stalking should therefore be nurtured and used to implement areas of the strategy, especially as this is usually done at a minimal cost to the Government.

We are extremely concerned regarding the high levels of poaching incidents taking place throughout Ireland at present. There is a clear need for this to be addressed within any deer management strategy developed, and we would like to see a more detailed outline of how the Departments' plan to tackle this problem.