



**IWT response to Draft Deer Management Policy Vision from the
Inter-agency Deer Policy Group, 28th November, 2011.**

The IWT is grateful for the opportunity to respond to the aforementioned draft policy and welcomes the formulation of the policy as an overdue element in the management and conservation of our natural heritage.

We would like to stress that deer, and especially red deer, are an integral component of our native wildlife, which have been present in Ireland since the end of the last Ice Age. The persecution and eventual elimination of the wolf, a top predator that kept deer numbers in check, along with the subsequent introduction of non-native deer species by human agency have resulted in the current situation whereby four deer species are known to be breeding in Ireland with little population control.

The IWT accepts the commonly held belief that deer numbers have increased in some areas but without hard evidence this increase is impossible to verify. We therefore welcome the principle, stated in the draft policy that “a national census of deer population and distribution must be carried out”. This must be a first step prior to the implementation of management interventions.

Uncontrolled deer numbers can have negative impacts on habitats of high conservation value, particularly our native woodlands, through over-grazing and a subsequent loss of local biodiversity. However in these cases other factors are often at play, e.g. grazing by sheep in areas that are shared by deer. Therefore the management of deer in areas of high conservation value such as National Parks or Special Areas of Conservation (SACs) must be considered only as a part of the overall management of these sites. In the case of SACs the control of deer should be included as a conservation objective to be determined in consultation with the National Parks and Wildlife Service and relevant landowners.

Until such time as the re-introduction of the wolf in Ireland is considered (a move that would restore a sustainable means of control of the deer population and benefit biodiversity) the IWT accepts that humane culling of deer will be a necessary component of any management strategy.

We would argue that any management strategy should prioritise areas of high conservation value that are considered most under threat from deer numbers. These areas are frequently of high amenity and landscape value also and so such an approach does not ignore the economic and social dimension of the draft policy.