

## **RESPONSE TO INTER AGENCY DEER MANAGEMENT POLICY VISION DOCUMENT SEPT 2011.**

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### **POSITIVES**

Its great to see an initiative finally that could play a role in establishing a policy programme that could lead to the development of an understanding of the position of Deer in Ireland ,a structured recommendation that will address their successful management and to secure a positive future for all those interested stakeholders in whose hands the future of Deer in Ireland lies ,and not one that is driven by a single stakeholder agenda .

I understand that this policy requirement has been on the cards for many years ,and areas of concern have been unfairly reported by the media recently ,fuelled by grant aided ill founded reports that did little else but generated information that was grounded on minimum factual data and knowledge .

Its not such a long time ago that there were high level talks about reducing the Deer numbers by removing the shooting seasons ! This demonstrates the level of understanding up to now .

Interestingly , what brought all this new grasp to a head was the conference this summer ,organised by the Irish Deer Society ,primarily a society driven by Deer Shooting interests .

Others have now embraced the proposition ,mainly for gain ,but that doesn't really matter ,so long as no one body has too much power.

The roadmap for a potentially successful programme of long term management of Deer was fully identified at this conference by the UK expert who was involved in the original frame work set up a long time ago in the UK ,under the same negative scenario we faced here ,and challenges of bringing a large range of disperate organisations together .

His recommendations were very clear ,and sometimes its best to follow success rather than originate the same basic errors .

## HOWEVER

,I am exceedingly disappointed by this “positioning paper” ,which is in no way a policy vision .

While I understand it is a starting point ,after all the positive proposals presented on this subject from a range of sources ,to find such a weak document ,when so much more is available , displays a lack of expertise and grasp to present such a paper ,and probably real committment also .

It is based very much on the wording and sentiment of the Woods of Ireland report ,from which generated most of the hysterical negative media comment on Deer arose ,and which was again grounded on weakness and lack of grasp .

I find it strange that the 2 key Government departments leading this latest “proposal” ,are the original 2 that have been involved since 2009 in the IADPG Deer management Group,although were informally linked since 2006 , ,and have achieved nothing ,nor attempted to achieve anything .

By their inaction the much reported problems of the Deer population explosion, excessive damage etc etc ,over this period ,have been dramatically eroded ,and the problem may not be as serious now as was .

Despite this ,now is a good time to get a plan up and running ,and I fully welcome any plan ; its the make up of the steering committee that leaves me with little confidence .

As someone who has been hunting and managing Deer for almost 40 years , is on the ground hunting Deer for over 16 hours every week in the season ,and a great amount of time on the ground out of season , across a range of different areas of habitat and location ,around 15 , and someone who keeps their ear very close to ground ,I can report a serious decline of Deer numbers across a large number of areas ,and a major imbalance of genre in others .

Even in the newly formed funded Glasnamullen Deer Management Study Programme , in Co Wicklow , on which I am an active committee member and which is mainly driven by farmers ,the consensus is that numbers have declined .

### **This decline is caused mainly by..**

- 1..Inactivity and lack of commitment by OPW /Wildlife Department to address the Poaching issue ,which has been fuelled by unemployment and rising carcass values
- .2..Greed and ignorance on behalf of a range of Deer hunters. There is currently no serious representation body for Deer Stalking Interests ,hence most hunters operate in a solusc environment with no guidance .
- 3..The legal selling of illegally shot Deer and acceptance of such by game Dealers and authorities .
- 4..Non enforcement of the laws in existence regarding shooting from public roads ,from vehicles etc all of which are enforceable by Rangers , Gardai and legal authorised Deer Stalkers .
- 5..While Coillte have produced positive procedure documentation encouraging licencees to address the Deer poaching issue on their ground , unfortunately ,very few licencees have reacted

positively ,still remaining inactive and hoping that someone else will protect their rights and investment on the ground .

6..Lack of knowledge and understanding as to where Deer management and Deer shooting interests meet up . It is currently a free for all ,mostly about numbers and money .

7..Increased number of Deer stalkers over the recent past ,who achieved qualifications too quickly ,the high cost of Deer lettings ,and the high price offered .

8..Increased number of Commercial operations offering paid of tourist shooting ,that greatly effects genre balance .

9.. A lack of willingness to introduce basic mandatory qualification standard to engage in the art of Deer shooting/management .

Combine all of the above it is clear that the inactivity of all the relevant bodies involved has inadvertently potentially achieved their aim of reducing the deer population !

The department of Agriculture ,who have had minimal involvement up to now ,and have limited knowledge of Deer related issues pertaining to management ,culling etc ,have suddenly got active ,and through personal agendas and commercial interests were lead and coerced into a programme of traceability actions on behalf of the FSA that was totally ill thought out ,yet put more pressure on the existing legal Deer Hunter totally unnecessary ,and admitted that it as in error !

The analogy to their approach is similar having one qualification for driving ,for the driving test proficiency ,and having to do another qualification for the rules of the road .

One needs to be alert to opportunist proposals ,based on delivering part solutions ,purely for positioning and gain .

In terms of the genuine hunter ,Inclusion strategies are far more valuable that exclusion if a real solution is genuinely sought !

In all of this ,it is little wonder that there would be genuine concern ,and little faith ,in the core group's ability !

I understand that phase 1 of the whole startup of the Deer management programme was for some group /body to take a lead and gradually bring other interested bodies along ,but surely these 2 are the wrong ones ?

To be clear ,as stated previously ,I fully welcome and support any positive Programme for the sustainable management of Deer in Ireland ,but am just concerned about the initial core group .

I say this because while you allude and make reference to the recreational deer hunter in your paper ,it is a fact that this group of interested stakeholders account for probably 90%+ of the annual Deer cull ,so are actually more important to the achieve the solution than you give credit to .

In the main ,Hunters need guidance ,and a positive approach to poaching .

It is a disappointment ,but no surprise , that the various Deer Societies in Ireland offer disparate and weak solutions representing a very small percentage of Hunters ,and by their very weakness ,are not at some level at the core start up .

The main reason for that is that across the years ,they have offered very little in terms of capturing interest ,and lost credibility ,and this programme and organising body would be at risk of the same .

It is imperative that any startup includes and recognise ,and achieves confidence within this group.

To manage Deer successfully requires huge commitment ,knowledge and understanding of all stakeholders ,and cannot be done by paid stalkers..there is no commercial model anywhere to support or sustain this .

So it could be viewed that the 2 Government Bodies fronting this potential policy may not be the best to lead .

There has been much grafting , comment and personal agenda plays behind the scenes on the issue on who is best to go forward to lead ,and while this is always a precursor for establishing and long term success ,it is sad that in a small market ,we can be so insular .

Why alienate the Deer Alliance for example ,who put in the original proposal and showed the most interest on the day , but seem to have been shafted along the way . The Deer Alliance single handedly introduced and implemented a Hunter qualification to over 1100 hunters so far .

Maybe the NARGC ,which does represent serious scale in numbers and influence ,should be at the table ,but not while concentrating on their FSA potential FETAC qualification for financial gain ,and using it as their core approach .

Maybe all these will in the future ,but getting started will be the problem .

Where do the stalking interests sit in all of this ?

A further area of concern is the issue of quoting data based on an estimate of the national Deer population (300k) ,while stating that the initial objective should be a census of Deer to establish numbers in this vision document .

This is illogical . A Deer census is potentially an unachievable objective . If it were possible ,i would have thought that both Coillte , OPW , and private forestry interests would have conducted some type of basic census before now ,especially as they control a major portion of Deer habitat in Ireland and would have tried to establish a level of numbers .

Cull returns ,submitted annually to both Coillte and OPW ,while probably identified as inaccurate ,do over time ,deliver a statistical trend that can be worked on over time ,and could be used as a starting point .

The population estimate in this proposal is based again on the Woods of Ireland report ,that had almost no sound footing for fact .

Having identified a need for a census ,this paper goes to claim that around 10% of this number is recorded shot every year.

Any basic Deer management structure model will indicate around 25-30% cull of a population for a population to remain stable .

Your figures would suggest that the population of Deer in Ireland is growing fully out of control ,which I would contest is now not the case .

So how can we have confidence and support this proposal in its present form ?

Yes we need to get to the table and make a start on developing a management programme to protect interests and have a sustainable healthy and valued national Deer herd ,it is never too late , but I am just not sure we have the right people at the top table that will instill credibility ,authority and leadership needed to receive buyin from others to start the journey to Best practice Deer management in Ireland .

In the second part in my submission ,I outline a possible initial initiative action point that could get the programme off to a quick and credible start .

Yes it would alienate many , but any genuine Hunter should have little difficulty ,so long as it was explained fully to them ,and involved them .

In the end ,any possible solution must be based on real deterrents and penalties .

I have not thought through fully the implementation ,administration and monitoring of this proposal ,but its entirely feasible ,if the will was there .

However ,it would only work if commercial poaching received the full rigor of the law .

## **DEER MANAGEMENT PROGRAMME**

### **POSSIBLE SOLUTION (PART OF ) INITIAL ACTION POINT.**

**AS PROPOSED BY PAUL CULLEN 0862680670 (Grouse lodge  
,Glasnamullen,Bray ,Co Wicklow)**

There is no doubt that the programme for Deer Management should be established and driven in to achieve short ,medium and longterm goals .

In the short term , for the Programme to become established ,gain credibility and deliver some actionable and accountable results ,the first point of call should be the Hunters .

As stated ,I would be unclear as to who should/would implement/monitor this proposed tagging system ,but I believe if the will was there ,the commitment would follow .

It should be a tagging proposal and system NOT based around the FSA/Dept of Agriculture planned proposal for tagging for yet more traceability . While this has validity ,all that is already there...enough to fill any EU directive .

This tagging system ,or any start up initiative, must not be seen as a single stakeholder agenda .

### **There are 4 problems relating to Deer.**

#### **POPULATION**

Everyone has a view on this ,but some of the key facts are as follows.

Numbers are perceived as increasing ,and despite facts ,this is the perception . This could be a function of current tree harvesting ,and large areas of replanting where damage is identified quicker than previous ,and also potential large movement of Deer to new areas .

Ratio of Stags to Hinds is totally out of balance for all the recent reasons of overshooting of Stags ,Commercial shooting ,indiscriminate shooting for carcass reward ...mostly all based on ignorance and greed .

This imbalance will ultimately lead to an increase in Deer numbers as females cause the growth and the urge ,and availability ,for easy Trophy hunting declines .

#### **DAMAGE TO CROPS/TREES ,RTAs ,DESEASE SPREAD AND HABITAT SPREAD .**

There are numerous examples of severe damage to tree plantations ,crops ,and well accounted studies on delivering management programmes for sustainable deer populations on the ground to minimise such damage .

It is acknowledged that there is identified damage in areas of hot spot populations .

It is acknowledged that Deer do cause RTAs ,but in reality , probably no more than in the past , but more noticeable as roads have become larger and faster . There is no real data to dispute this either way .

There have been many studies conducted about transfer and spread of notifiable diseases in Deer populations . The vast number of Deer passing through Game Dealers are inspected for such diseases ,and % s are very low. In selected areas of prolific reaccuring TB ,Deer as well as badgers carry the responsibility ,and can be managed if the will is there .

#### **POACHING**

There is a huge increase in poaching ,fuelled by all the obvious well stated reasons .

There are severe safety issues ,as highlighted by several documented incidents recently .

It is illegal under several legislations ,but there is minimum risk of apprehension ,and very high reward .

Poaching is totally indiscriminate and effects a range of issues within Deer ,not least causing in potential wounding and pain to Deer.

Poaching is stealing property for gain .

## **HUNTERS**

There are many genuine Hunters ,but not part of a structure and operating in isolation .

There are large number of new hunters who have marksmen skills but little else

There are a large number of part time recreational Hunters that hunt deer as they hunt other quarry ,such and rabbits or pheasants .

There is a huge lack of knowledge and education relating to Deer issues

There is little tradition of Deer Management in Ireland

Hunters are accustomed to paying excessive market led rents for stalking that encourages overshooting ,commercial shooting for Stags ,or apathy by rich occasional Hunters who dictate the market price ,but shoot few Deer . Money and Deer Management tend to m be mutually beneficial .

Increased rents mean increased Hunter numbers in syndicates resulting in even less Deer being culled due to disturbance .

## **POTENTIAL PHASE 1 SOLUTION .**

It is a fact that the fastest ,most productive action to get a Deer programme established is through the Hunters .

Not all Hunters can manage Deer because of Land size ,skills , time commitment etc. Not Hunters have the ability to manage Deer . Not all Hunters have the knowledge , education or qualifications ,or will to get involved in Deer management. Not all Hunters have opportunity to get involved .

It will require a mindset change across all Stakeholders involved ,but this will not happen without strict measures and penalties for inaction .

## **INTRODUCE A NATIONAL TAGGING SYSTEM, AND POSSIBLE REDUCTION IN SEASON FOR SEPTEMBER .**

The authorities /Deer Programme Committee ,OPW issue tags based on sex ,and area (age could follow)

Some would argue that this is not possible to implement in the absence of a Deer census ,but there is currently enough data in cull returns to make stab. It obviously would be inaccurate ,but probably as good as needs be in year one ,to get started . In any event ,could not be worse than what is currently taking place .This could be quickly revised up or downward in year 2 and beyond .

This approach will not effect (alienate ) the genuine Hunter ,but bring others up to a standard ,in fact it would give them a status and a reason .

This could be implemented in the first instance on Coillte and OPW ground .

**The results of this would be several.**

- 1..If a Hunter has an area ,he will be responsible for the Deer in that area
- 2..the Hunter must work to some type of basic management plan. Hunters must meet the tag qualification ,or will risk loosing ground . Conversely ,engaged and delivering Hunters should be rewarded by reduced rents or increased safeguarding of tenure .
- 3..The Hunter must cull the number of deer in that area. .If not , then there would be questions and potential impact on next years hunting .
- 4...Hot spots can be identified and dealt with accordingly at the local level ,with successes being replicated else where ...ie demonstrate by results from the bottom upwards .
- 5..Poaching will be greatly reduced...you cannot sell Deer without a Tag..no grey areas . It is not possible to lie about t a tag .
- 6...The population sex ratio will become more balanced as more females get culled in accordance with tags .
- 7.. The overall quality of the Deer herd will improve ,and quality of Antlers will improve as Stags are allowed to live longer .
- 8.. Deer as a sporting quarry will become more valued by all stakeholders .
- 9..Will avoid the relentless over hunting of Stags in September /October ,and spread the hunting across the full season .
- 10..Section 42s should be for females only unless on special circumstances ,and definitely not with lamps .
- 11..Safety will increase as less need for indiscriminate ,risk taking ,nocturnal hunting for financial gain .
- 12..Will ultimately sort out the genuine from the disinterested Hunter . The pursuit of Deer should be a right that is earned .

## **WHO SHOULD BENEFIT FROM THIS ACTION**

The fast forwarding of the set up of the National Deer Management Programme

The National Deer Herd..*Healthier ,more balanced ,better quality*

The genuine Hunter/Manager....*part of a system ,reward*

Coillte..*less damage ...,more accountability for Forest Stewardship etc*

NPW...*less work ,more reward ,more accountability*

Private Forestry...*less damage ,more grants*

Farmers..*less damage ,less disease spread and a solution if it occurs*

Gardai..*less RTAs potential*