



WICKLOW DEER GROUP

DEERFIELD, WALSH TOWN, BALLYMURPHY, BORRIS, CO. CARLOW

DRAFT DEER MANAGEMENT POLICY VISION – SUBMISSIONS NOVEMBER 2011

1: ABOUT WICKLOW DEER GROUP

1.1: Wicklow Deer Management & Conservation Group (“Wicklow Deer Group”) was formed in 1991 arising from a perceived need amongst a group of like-minded and committed licensed deer hunters, for a practical forum for discussion and a medium for the promotion and exercise of best-practice management of wild deer in Ireland.

1.2: All of its members but particularly its three founding members have extensive practical experience of deer management accumulated over several decades, taking in the three species of wild deer found in Ireland, and including both lowland and open range deer. All Wicklow Deer Group members are fully licensed, insured and HCAP-Certified Stalkers.

1.3: Wicklow Deer Group, through its individual members, currently licenses a number of different forest areas from Coillte Teoranta, as well as managing deer on different areas of privately-owned land. Individual members of the Group are also nominated stalkers on a number of different Coillte forest properties as well as managing deer on other land. The Group has been a participating member of Deer Alliance HCAP since inception of the latter organisation, and two of its members have led the development of the Hunter Competence Assessment Programme over the ten years of its life to date.

1.4: Wicklow Deer Group is supportive of the concept of a national policy on wild deer, taking in all those strategic and social principles identified in the Draft Policy

Vision document as published by the Inter-Agency Deer Policy Group,, but not limited to those principles, and is not uncritical of certain aspects of the document; and sets out hereunder its observations on the document. Notwithstanding that the process of formulating a national deer policy was initiated in July 2006 on foot of a Memorandum of Understanding between NPWS and the Forest Service and that it has taken over five years to arrive at even a draft document, Wicklow Deer Group wishes to congratulate the Inter-Agency Group on its achievement in getting this far, despite certain misgivings on the part of Wicklow Deer Group on the content and implications of the Vision document.

2: OBSERVATIONS ON THE DRAFT DEER MANAGEMENT POLICY VISION DOCUMENT

2.1: First and foremost, Wicklow Deer Group is concerned to note the uncritical publication of a projected national population of wild deer (three species) in excess of 300000 deer. It is noted that this figure is based on an assumption that cull figures as represented by hunters' annual cull returns constitute eight to ten per cent of the total deer population. Wicklow Deer Group rejects this assumption, and the extrapolation from cull returns to total population, as grossly unscientific, wholly without foundation and seriously misrepresentative of the true position.

2.2: Secondly, Wicklow Deer Group is concerned that the Vision document fails to fully recognise the crucial role of the body of licensed hunters in Ireland, now numbering in excess of 4300 and who, in the opinion of Wicklow Deer Group, are in the final analysis the persons best equipped and most likely to implement any and all practical issues arising from adoption of a national deer policy i.e. culling of deer.

2.3: Thirdly, Wicklow Deer Group is concerned to note the unsympathetic language used throughout the Vision document – unsympathetic to the true value of deer as a social, economic and sporting amenity – and an undue emphasis on narrow commercial interests including forestry and agricultural interests, without apparent full recognition of the need to properly balance those interests with those of the more vulnerable species.

3: RECOMMENDATIONS

3.1: Wicklow Deer Group recommends that as a first step in formulating policy in respect of control and management of wild deer, a proper census of deer numbers be undertaken nationally, and that any other method of estimating deer numbers be discounted as unreliable and inconclusive. It is noted that the Vision document identifies the need for a full census but Wicklow Deer Group is of the view that a proper census, updated at least annually over at least a five-year period, is an absolutely essential prerequisite to the formulation of policy, and a priority in terms of progression of proposals on policy.

3.2: Arising from conduct of a proper census, agreement should be achieved on parameters for measurement of a sustainable population of wild deer. Agreement must be achieved on acceptable densities, for measurement of deer damage where alleged, and if necessary, for a compensation scheme for landowners where densities and/or damage exceed agreed parameters, and culling, as part of a measured plan of management, is deficient.

3.3: “Best-practice” management of deer should be encouraged and facilitated by mandatory certification of licensed deer hunters (i.e. HCAP certification or equivalent to be a mandatory prerequisite for the granting of a licence to hunt wild deer).

3.4: Wicklow Deer Group recommends as part of any deer policy, the adoption of a carcass tagging system whereby all licensed hunters are issued with a numbered series of tags commensurate with their planned cull. Such a system offers the following benefits:

- a) it provides for a much more accurate measurement of actual cull
- b) taken with an annual census, it provides for a sounder cull target
- c) it assists in achieving traceability of carcasses and so contributes to food safety
- d) it acts as a disincentive for illegal shooting i.e. poaching – indeed, it could prove to be the most efficient deterrent available.

3.5: Wicklow Deer Group rejects the negative implications of the term “recreational hunter” when applied to those licensed deer hunters who take a front-line position in deer management and who strive to follow best-practice standards of deer management at all times. It is submitted that repeated use of this term suggests a failure to fully recognise the crucial role of licensed hunters in implementation of policy on deer management.

3.6: Coillte Teoranta should be encouraged to foster efficient and humane management of deer on their forest property by better recognition of the role of the licensed hunter and less reliance on a tender system which favours “best offer” rather than “best practice”.

3.7: Wicklow Deer Group recommends the establishment of an independent and properly funded secretariat, charged with fine-tuning and implementation of policy and practice, and commends for further consideration the model put forward for adoption by Deer Alliance HCAP and other stakeholders in April 2011, prior to publication of the Vision document in October 2011; re-configured where necessary or appropriate in the context of the now-published Vision document and any and all submissions received in the course of public consultation.

Delivered by Liam M. Nolan on behalf of Deer Wicklow Group, 28 November 2011.

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