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Conversation: Wild Deer Association of Ireland submission on the Draft Policy Vision for Deer Management in Ireland

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To whom it may concern:

Please find attached our submission on the Draft Policy Vision for Deer Management in Ireland on behalf of the Wild Deer Association of Ireland.

We welcome this initiative and as the largest organisation representing those involved in the deer management and the interests of our wild deer herds, we look forward to working with you as a key stakeholder in the next stage of any National Deer Strategy partnership.

If you have any queries regarding our submission, do not hesitate to contact us.

Yours faithfully,

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Wild Deer Association of Ireland submission on the Draft Policy Vision for Deer Management in Ireland

Introduction

Since its establishment in 1981 the Wild Deer Association of Ireland (WDAI) has grown to become the largest organisation of its kind in Ireland, representing those involved in deer management, deer stalking and people with an interest in the conservation and well-being of Ireland's wild deer herds.

The Wild Deer Association of Ireland is recognised as a leading authority on wild deer in Ireland, hosting events throughout the year with the aim to develop the knowledge and skills of our members and the general public. We host numerous events, seminars and international deer experts on issues relating to deer and deer management. We work closely with government departments on issues of mutual interest and have been instrumental in amending legislation to the benefit of deer and those involved in their management. The Wild Deer Association of Ireland is one of the founder members of Deer Alliance, the assessment committee set up to oversee the Hunter Competence Assessment Programme (HCAP), which provides a first step to developing the knowledge and competence of deer managers and deer stalkers by providing a recognised qualification.

In addition, we are a member of FACE which is recognised by the European Commission as the main discussion partner, representing Europe's 7 million hunters, and is consulted by the relevant Directorate-General during the elaboration and monitoring of EU legislation dealing with hunting, wildlife management, nature conservation, firearms, wild animal health, game meat hygiene, etc. We are also a member of CIC International which represents hunters in over 80 countries around the world.

Through our national membership and various social media outlets we run numerous campaigns promoting the discussion of topics such as the illegal taking of deer (poaching), road traffic accidents involving deer and the support of landowners who suffer genuine deer crop damage.

The Wild Deer Association of Ireland has been to the fore in recent years in calling for the implementation of a National Deer Management Strategy and would be a key stakeholder in such an initiative.

Background

Wild deer are an important part of our heritage; they contribute to the rural economy, are integral to our biodiversity and are enjoyed by people from all walks of life. As a species protected by law under the Wildlife Acts, they currently receive insubstantial attention from those charged with their protection, mostly through lack of resources and priority. Our aim is to ensure that there is a sustainable population of deer that can co-exist in harmony with the environment and the people who live and work there.

While there are known hotspots of over population, claims of known deer populations and increasing numbers are without foundation or factual data. The simple fact is we neither know if deer numbers are increasing or decreasing. A recent national survey undertaken by the Wild Deer Association of Ireland of Deer Stalkers and Foresters show that 81% of deer stalkers and 29% of foresters have seen a reduction in deer numbers in their area.

Deer Management Objectives

- We support the promotion of scientific research, education as well as the dissemination of factual information to the general public. While a national census of deer numbers is desirable it is not a realistic short/medium term goal; over a 3 – 5 year term national hotspots should be identified and a census undertaken.
- We support practical guidelines in respect of the release, keeping or sale of invasive non-native species in Ireland as outlined by the NPWS. The translocation/deliberate release of deer should be prohibited, with exception, by licence for scientific reasons or to safeguard our native Irish Red deer. It should be illegal for an unlicensed premise/person to have deer in their possession.
- To ensure the integrity of any National Deer Management policy, the inclusion and vital inputs of the deer stalking community need to be recognised at the outset, without undue emphasis but cognisant of the fact that the fullest possible support and participation of licensed hunters is essential from such organisations as the Wild Deer Association of Ireland.
- Planting road verges with alternative plants, such as an unpalatable variety will reduce deer vehicle collisions, in addition an environmental impact study must be carried out before afforestation/planting in proximity to main road networks.

- Deer should be managed by levels of damage to woodland and not by population size, i.e. adjusting management cull figures where damage is reduced and woodland has reached a semi-state of maturity.
- We recommend the closing of certain forests to the general public to facilitate culling for safety reasons and to allow proper deer management.
- Regular DNA samples should be taken of live deer in Killarney National Park to monitor the genetic purity. The NPWS should pursue registering the native Irish red deer on the Red list of the I.U.C.N (World Conservation Union) for better protection. The IUCN Red list of threatened animals states that, a population is threatened if it does not contain at least 1000 individuals capable of reproducing. The Red Deer in Killarney would be considered as "Near Threatened" and require monitoring.
- The culling of Japanese Sika in Killarney national park must be undertaken to ensure the genetic purity of the indigenous Red deer.
- When culling female deer during the early part of the season i.e. November, every effort should be made to cull any dependant young before culling the female, this activity should only be undertaken by a competent deer stalker/manager.
- The hunting of wild deer should be suspended during severe weather conditions. This suspension should be automatically triggered following an agreed period of severe weather.
- We recommend the establishment of an academy for deer stalkers, deer managers, foresters and land users who interact with deer. This should provide a comprehensive understanding of the key principles of deer and habitat biology, ecology and management and how to measure the effects of deer on woodland and to differentiate damage caused by other mammals. The completion of the Hunter Competence Assessment Programme or a similar standard should be a prerequisite to the awarding of a deer hunting licence.

- We recommend a Tagging system to replace the existing issuing of Deer Hunting Licences, as the current process for the awarding of Deer Hunting licences has resulted in an imbalance in the deer population as a result of non-selective culling and the absence of management policies. Such a tagging system would be based on selective culling of the older stags, hinds and surplus young males whilst maintaining a diverse range of older stags. In addition tags would be issued based on local population and habitat requirements.
- The culling of the dominant male or the “alpha male” should be discouraged to ensure a healthy population.
- The current process of issuing permits under section 42 of the Wildlife Acts requires an immediate review with input from all stakeholders. Such permits with a condition attaching allowing the lamping of deer should only be issued to competent DAHG staff.
- There should be increased promotion of Registered Game Dealers, along with increased regulation and presence by NPWS, DAFF staff at Game Handling Establishment premises.
- Creation of a dedicated Deer Poaching Helpline implemented by DAHG and supported by all stakeholders. An amendment to the Wildlife Acts should be made to increase penalties for the illegal taking of deer (poaching). Supported by the implementation of a Press Release and Media Campaign highlighting the illegal taking of deer (deer poaching) by DAHG and supported by all stakeholders.
- Dedicated staff within DAHG to addressing deer poaching and promoting awareness internally. An Garda Síochána should appoint a Wildlife Liaison officer to highlight wildlife crimes within Garda districts as this system works successfully in other countries.
- Internal message of support from DAHG management to DAHG staff, to address the internal negative opinions of deer. “Top down” direction from DAHG management to local rangers supporting Deer Management objectives.
- Minimum night patrol targets should be set by DAHG working in conjunction with Garda, deer organisations and other key stakeholders.
- While the promotion of tourism from deer stalking and other hunting activities should be explored, it is vital appropriate regulation is put in place first to prevent the exploitation of deer.

- To avoid further exploitation permits issued under Section 42 for red deer stags in Co. Kerry should only be issued on the basis the culling takes place under supervision and the animal/antlers are retained by DAHG staff. Only the person to whom the permit is issued (nominated stalker) should cull the animal and this should be proven prior to the animal being culled.
- Following consistent reporting of low deer numbers the open season for female red deer in Co. Kerry is closed until such time as we have accurate data on current numbers (outside of the national park).
- Forestry design should accommodate future culling of deer, such as "deer lawns" and other open spaces.
- It is widely believed the current cull returns provided to DAHG are grossly inaccurate. DAHG should undertake spot checks to ensure authenticity of returns and compare against data provided at Game Handling Establishments. Furthermore all cull returns showing Muntjac should be fully investigated. To date we have seen evidence of 2 Muntjac in Wicklow/Republic of Ireland, however cull returns show significantly higher culls in several counties.

National Deer Management Partnership

Wild Deer Association of Ireland would like to see a Partnership over-seeing any National Deer Strategy, made up of an enlarged Steering Committee ("Strategy Committee") to be formed forthwith. This should be comprised of all existing Deer Alliance HCAP Assessment Committee members and representatives, together with additional representatives of other stakeholders e.g. Woodlands of Ireland, Food Safety Authority of Ireland and DAFF (and/or other organisations representing stalkers), ensuring so far as possible that every identifiable stakeholder grouping is properly represented and given a voice in the formulation and implementation of strategy.

An Independent Chairperson should be appointed and charged with responsibility for ensuring that all stakeholders are treated equally and all viewpoints are carefully balanced so as to ensure maximum productivity.

The model adopted by the Deer Initiative in the UK appears to offer scope and more particularly, the practices followed to achieve objectives.

For these proposals to work, it will require the fullest possible commitment, especially at a political level, from State agencies and from landowner groups.

In compiling this submission the following individuals/organisations were consulted/ provided input/ previous feedback acknowledged –

- *Seppi Höna B. Agr. Sc. (Forestry), M. Sc. (Forestry), M. Sc. (Wildlife Management & Conservation), MSIF*
- *Joe Murphy, Deer Stalker*
- *Hal Chavasse, Forester*
- *Tom Grace, Deer Stalker*
- *Del Harding CELT (Centre for Environmental Living and Training)*
- *Damien Hannigan, Deer Stalker*
- *Dr Declan Little, Project Manager, Woodlands of Ireland*
- *Liam Nolan, Deer Alliance*
- *Countryside Alliance Ireland*
- *Oliver Kierse, Deer Stalker*
- *Finnish National Moose Management plan <http://www.cic-wildlife.org/index.php?id=799>*
- *CIC <http://www.cic-wildlife.org/index.php?id=117>*
- *The Initiative UK <http://www.thedeerinitiative.co.uk/>*
- *Wild Deer Association of Ireland <http://www.wilddeerireland.com/index.html>*