

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

27th November, 2011

Re: Deer Management Policy Vision

Dear Sir/Madam

On behalf of Woodlands of Ireland (WoI) I wish to make the following submission re the above. At the outset, I would like to commend the Inter-agency group, including the Forest Service, NPWS and Coillte for the work and effort which has resulted in this draft policy vision, and the Forest Service for taking on the responsibility of driving the initiative via public consultation. It should also be noted that WoI has focussed in depth on the deer issue in recent years with the commissioning of a report on the impacts of deer on forestry (as referenced in the consultation document) and through the formation of a sub-group comprising a range of deer stakeholders to address specific issues, and in particular their impact on the biodiversity of native woodlands.

Whilst understanding that the document must be brief at the consultation stage - setting out the background, objectives, principles and how policy development will be achieved - it is unclear which government department has overall responsibility for this initiative. At the very least a co-ordinating or lead government department such as Forest Service or NPWS is required and should be clearly stated if deer policy is to be advanced as described. This is especially important in leading the 'Policy Development Partnership' in terms of ensuring there are proper structures and procedures for this partnership, and providing the necessary resources for this group to arrive at an agreed 'National Management Strategy for Deer'. For the efficiency of driving this partnership and its operation the name of one government agency should be stated in this section, i.e. the lead agency.

A committee representative of all key deer stakeholders needs to be established with professional facilitation at key junctures to ensure a positive outcome. A lead agency in this regard should not imply sole responsibility as deer policy is the responsibility of, and affects a number of government departments. Once a policy is agreed, resources to tackle the issue may therefore be derived from a number of government departments.

Once public consultation is finished the lead government agency should, in our view, outline a second draft that consists of policy options based on the statutory and policy framework, within which it is expected to contribute, as well as input from the public consultation process. A summary of available evidence on the current position regarding populations, likely trends, and positive and negative impacts of deer across all impacted sectors. Primary sources of information on deer numbers, damage, opportunities, etc., should be sourced if available, or if not, the data should be derived from research to address any gaps as soon as possible. For example, as alluded to in the document, there is a need for baseline data on deer populations and trends to inform future policy development and implementation. Research is required to establish the national population and local trends as soon as possible. This second draft should form the basis of discussion at 'Policy Development Partnership' stage via the stakeholders committee alluded to above.

The policy vision should make explicit reference to the more important or key elements of the policy framework, including for example, the Invasive Species Ireland process. It should also outline the current key legislation that is relevant to deer, including national, EU and International legislation.

There is no reference to the expanding deer population or deer issues in Northern Ireland and the need for a common approach regarding cross-border issues. Ideally the inter-agency approach should seek recognition at the North-South Ministerial level. However WoI realises that this is a position for Ministers to reach and not public servants. Within the 'Policy Development Partnership' a cross border partnership should be included.

With respect to aspects of the text the following is suggested:

It should be stated early on in the document that the successful implementation of a national deer policy requires not only a 'top down' government-lead approach but also a local and regional 'bottom up' approach that is based on local deer management groups. In this context alternative measures will be required in different locations depending on deer numbers, land-use, etc.

Under the section 'Strategic Principles' it's stated that 'Wild deer are a valued part of the wider biodiversity of the Irish countryside' (first bullet point). However this is not true of all our wild deer populations, especially the introduced species and notably Muntjac and Chinese Water deer. We feel this should be rephrased to reflect that not all 'wild deer' are valued.

The last sentence of the final bullet point should readmanaged in a secure and regulated fashion (delete accountable).

(In the same section a number of words mid-sentences have capitals. These should be lower case, i.e. Jurisdictions, Countryside).

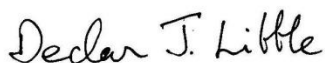
The first sentence of the 'Social Principles' section is unclear and should be reworded to state that 'Policy development will occur in consultation with key deer stakeholders'.

In the final section under 'Policy Development Partnership' the sentence containing 'overseen by the relevant government departments' ...should in our view read.... 'overseen by the lead agency involved.

Also there are other relevant government agencies not included in the current sentence in such as the Road Safety Authority, Disease control, Dept of Agriculture, etc. Perhaps another sentence stating that 'this partnership will include the government departments currently responsible for implementing legislation and policy with respect to deer'?

There are other areas that require detailed consideration and input including the development of an indigenous venison market (which would also offset somewhat the costs of management), poaching, ongoing monitoring of populations, etc. which we presume will be dealt with under the 'Policy Development Partnership' phase in which WoI would be happy to contribute.

Yours sincerely



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