

Draft Deer Management Policy Vision

DRAFT DISCUSSION DOCUMENT

Second Draft



Inter-Agency Deer Policy Group

September 2012

DRAFT DEER MANAGEMENT POLICY VISION

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Executive Summary

A significant challenge is presented in attempting to balance the demands of land use objectives such as agriculture, forestry and conservation, with the need to ensure that deer populations existing on the same land resources are managed and maintained at appropriate levels. Deer populations are capable of exerting considerable influence on woodland development and timber quality, on agricultural yields and economic outputs, and also on a range of other ecological and economic variables that may have an adverse impact on land management objectives in areas where deer populations exist. The management of wild deer populations must therefore take place within an appropriate management, regulatory and organisational environment, reflecting deer ranging behaviour, habitat scales, and the dynamic nature of modern land use practice and land use objectives.

Any management strategy must ensure that deer are managed in accordance with accepted international principles and standards of sustainable deer management. The role of deer as a valuable component of biodiversity must be recognised, but this must be balanced with an equal recognition of the potential of deer to impact adversely on a range of other biodiversity values, particularly where conservation habitats and their dependent species are concerned. Deer management policy should also recognise the critical difference between, native, naturalised and exotic species and their role in Irish ecology.

A primary goal of any deer management policy must be to ensure that economic losses as a consequence of deer can be minimised, especially in the agriculture and forestry sectors. At the same time, policy should seek to maximise the positive contribution of deer management activities to the rural and national economies, especially where the marketing and promotion of venison is concerned. All relevant land use policies must take account of deer management issues and there is a requirement for greatly improved education and awareness concerning deer management among land use professionals, which will in turn enable the implementation of deer management measures within the sectors concerned. Any deer management policy and implementation measures should maximise cost effectiveness, and where appropriate make use of existing systems and resources to minimise implementation costs.

Policy should support strong measures aimed at developing professional deer management capacity within the main land use sectors, including the training and development of professional deer management personnel, and the direct involvement of land use interests in the development of local Deer Management Groups. The recreational deer hunting sector has the potential to augment its existing contribution to deer management objectives, provided hunting activity takes place within a structured deer management environment. Significant stakeholder involvement will be required in developing suitable organisational structures capable of delivering deer management outputs, including biological data collection and reporting, on a consistent basis within a structured deer management environment.

In developing and implementing deer management measures, the welfare and humane treatment of deer populations shall be paramount. Policy should support training and education measures necessary to ensure that management measures and their implementation conform to international best practice and standards, and comply with existing national and EU legislation regarding animal welfare, food standards and human safety.

The implementation of a sustainable deer management programme in Ireland requires the establishment of appropriate policy, regulatory and administrative frameworks, capable of supporting and sustaining measures on a long term, consistent basis. This may require significant

changes to existing deer related legislation and policy frameworks and may require comprehensive revision of current deer legislation in the light of significant changes to land use practice, conservation requirements, deer hunting practice and deer population dynamics since the introduction of current primary legislation (Wildlife Act, 1976).

A strong spatial framework is required to permit accurate reporting of deer population densities, and population trends and enable appropriate prioritisation and allocation of deer management resources to the areas where they are most needed. With the objective of sustainable deer management in mind, and with the consent and cooperation of key stakeholders, it is proposed to re-develop the existing spatial and organisational framework for deer hunting to reflect similar deer management structures in Europe, and within the small game sector in Ireland. It is proposed that this development would take place on a phased basis, and would permit a more consistent approach to deer population management and recreational hunting values at local level in areas where deer populations exist.

Development of a sustainable, achievable deer management policy is best progressed within an external partnership arrangement comprised of representatives of sectoral interests and stakeholders, overseen and facilitated by the relevant Government Departments concerned – Department of Agriculture, Food and Marine and the Department of Arts, Heritage and the Gaeltacht. Implementation of deer management policy will require establishment of a full time National Deer Management Unit that will co-ordinate the development and implementation of deer management policy at National, Regional and Local levels.

It is hoped that the document will provide an important input to the decision making process. This document represents the output of the Working Group and is not a statement of Government policy. The Group is aware that its recommendations will need to be considered by the relevant Government Departments (the Department of Agriculture, Food and Marine and the Department of Arts, Heritage and the Gaeltacht) in the context of those Departments' overall responsibilities. The Group is also mindful of the fact that some of the recommendations in the report relating to increased staffing and financial resources will prove difficult given current resource constraints across the public sector. Clearly any legislative proposals that emerge from Departmental consideration would ultimately require Government approval prior to implementation.

Inter-agency Deer Policy Group

This paper has been developed by the Interagency Deer Policy Group (IADPG) comprised of deer management professionals drawn from Department of Arts, Heritage and the Gaeltacht (DAHG), Department of Agriculture, Food and the Marine (DAFM) and Coillte Teoranta. The group was formally established in July 2009. The basis for establishment and operation of the group is contained in a Memorandum of Understanding between the National Parks and Wildlife Service (NPWS) and Forest Service dated July 2006. The primary objective of the IADPG is the development of a Deer Management Policy Vision that can be agreed and delivered jointly by both Departments in collaboration with relevant stakeholders. Currently, the group is comprised of:

- Mr. Wesley Atkinson, NPWS, DAHG
- Mr. Ciaran Nugent, Forest Service, DAFM
- Dr. Tim Burkitt, NPWS, DAHG
- Mr. Barry Coad (Coillte Teoranta)

Objective

To develop and maintain an integrated policy framework for sustainable wild deer management in Ireland that fully reflects the desired economic, environmental and social values across relevant land use sectors in the Irish countryside and complies with existing legislative and policy requirements.

Deer Policy Vision

Policy should enable 'the sustainable management of wild deer populations in Ireland within acceptable population limits whilst ensuring that productive and ecological functions of affected land use sectors can be protected and that the socio-economic potential of wild deer in Ireland can be maximised. This will be achieved through the development of an effective deer management culture across all relevant land use sectors by delivering an appropriately resourced deer management structure that complies with existing legislative and policy requirements and conforms to international best practice.

To be successful:

- Deer management measures must be integrated with existing policy and practice across the range of land use sectors concerned.
- Any deer management policy must facilitate and support applied research where wild deer are concerned, as a basis for further policy development and review.
- It is essential that existing legislative and policy provisions that relate to deer are reviewed and maintained in an up to date manner.
- Deer management policy must recognise that, in many contexts, deer are an important and valuable resource in their own right, to be managed for sustainable exploitation, or as an integral component of dynamic natural ecosystems.

Strategic Principles

1.0 Deer management related spatial and organisational issues

The management of wild deer must take place within appropriate management, regulatory and spatial structures that reflect deer ranging behaviour and habitat scales, and the dynamic nature of modern land use practice and land use objectives.

- 1.1 Policy should enable the provision of dedicated professional deer management resources that are essential to the appropriate application and monitoring of deer management activities at the various scales and across the wide range of land use types. A full time deer management unit should be established, that would be responsible for policy implementation, monitoring and reporting in the field.
- 1.2 Deer management practice must take place across a range of spatial scales that correspond with patterns of deer habitat use taking account of existing and desired land management objectives within these areas.
- 1.3 Structured “deer management” in the proper sense does not currently exist in Ireland. Deer Management in this context should be taken to mean the integrated management of deer populations in balance with the carrying capacity and land use objectives of lands where deer exist. It will be based on objective and quantitative analysis of deer populations and their impacts on their habitats, and land use objectives in surrounding areas.
- 1.4 Deer management is a technical, complex and dynamic process, and variables involved may differ greatly between catchments and localities. Appropriate organisational structures are required to provide a basis for deer management activities, in order that appropriate management can be applied and monitored consistently at local level. Spatial and organisational issues are addressed in more detail in Section 7.
- 1.5 Policy should enable revision of the existing regulation and licensing system for deer hunting and population control to a system more spatially appropriate to the modern rapidly changing patterns of land use in the Irish landscape, and related deer activity. It should provide for the collection and collation of sufficiently accurate and verifiable data regarding deer culls, which can be used as a guide to management at the spatial scales required.
- 1.6 Accurate, quantitative data regarding deer population densities and spatial distribution within and between land catchments is a critical component of any successful deer management programme. An assessment of deer population distribution and densities must be carried out as an essential prerequisite to any deer management strategy in the field. It will provide an indication of the required scale, extent and likely costs of such measures. A national deer population assessment programme will provide the baseline against which the dynamics of current populations can be observed, and by which policy performance can be evaluated over time.

- 1.7 Typically, deer population assessment should be carried out over a 3-5 year timeframe. There is an initial need to identify broad habitat categories in areas of interest. An initial sampling exercise will produce basic data on deer density levels across a range of different habitats. It will be enhanced by more intensive sampling in high density areas, or in areas where conflict with land management interests may exist. Population density survey data would be further refined by correlating detailed biometric data from culled animals against density estimates.
- 1.8 In addition to general density and distribution data, improved and verifiable data derived from licensed deer culling activity, including spatially referenced data and biometric data from culled animals, is required to provide additional quantitative inputs into deer management programmes within catchments.

2.0 Environmental /conservation issues relating to deer

Wild deer in Ireland will be managed in accordance with accepted international principles and standards of Sustainable Deer Management.

- 2.1 Wild Deer are a valued part of the wider biodiversity of the Irish countryside. However, the potential of deer populations to impact adversely on a range of biodiversity values must be fully recognised where protection of conservation habitats and their dependent species are concerned.
- 2.2 Detailed assessment and monitoring of deer density and impacts of deer populations is desirable in designated Natura 2000 sites.
- 2.3 While there is much emphasis on the impacts of deer on conservation values in terms of direct physical impacts, there is little or no current knowledge of potential wider ecological impacts of deer populations on biodiversity and conservation values. Current biodiversity losses to deer have not been quantified. Deer policy must support further applied research in this area.
- 2.4 Equally, the role of deer as an integral component of dynamic natural ecosystems, particularly in woodland but also in upland areas, is poorly understood. Further research is required in establishing the role of deer in creating and maintaining patterns of biodiversity in the landscape. It is likely that this function is closely linked to population density, patterns of use and habitat type. Thus, it is essential to establish critical thresholds for key habitat types by ensuring that deer populations are appropriately managed, so that negative impacts of deer on habitats can be reduced or eliminated. Policy should strongly support applied research towards improved understanding of the role of herbivore grazing (both positive and negative) and its importance in woodland ecology; understanding the impacts and potential benefits of native and naturalised deer species; determining the likely impacts of introduced invasive species (such as Wild Boar and Muntjac) on habitats and biodiversity values; and the role of deer as potential seed dispersers of native and invasive plant species and vectors of disease .
- 2.5 Deer Management policy should recognise and appreciate the critical difference between native, naturalised and exotic species, and their role in Irish ecology.
- 2.6 The conservation requirements of our native red deer populations and the need to protect their genetic integrity must be balanced with the need to protect priority habitats and species in areas where these populations exist. Increased vigilance by relevant authorities in both jurisdictions will be required to ensure that no further illegal introductions of exotic deer species take place onto the island of Ireland, and that existing populations of farmed and captive deer are managed in a secure and accountable fashion.
- 2.7 Deer management policy must strongly recognise the risk posed to native Irish red deer through hybridisation with Sika Deer and miscegenation with imported European red deer. A National survey in relation to hybridisation with emphasis on red deer in Co. Kerry is currently being prepared for NPWS and may guide future policy development in this area.

- 2.8 There is anecdotal evidence to suggest that red deer numbers in Co. Kerry may be declining, and strong evidence from deer census activity carried out within Killarney National Park to support this. There is a proposal to limit the shooting of red deer females in Co. Kerry from 2012/2013 season. Given the international importance of the Kerry red deer, policy should strongly support appropriate population assessment and monitoring programmes outside of Killarney National Park, and support contingency planning for the ongoing protection and genetic isolation of native red deer in this area.
- 2.9 Policy should also support applied research regarding potential biological control methods such as immuno-contraception, and the impacts of natural predation and other processes such as weather patterns and the effects of inter-annual variations in the North Atlantic / Arctic Oscillation on deer population dynamics.

3.0 Economic factors relating to deer management

Wild deer should be managed in a manner that contributes positively to the national economy and minimises losses due to deer activity in relevant economic sectors.

- 3.1 Deer management policy and implementation measures should maximise cost effectiveness and, where appropriate, make use of existing systems and resources to minimise implementation costs.
- 3.2 The cornerstone of any deer management policy shall be the minimisation of economic losses as a consequence of wild deer populations. These losses include damage to woodland, damage to agricultural crops, transmission of diseases to livestock and the financial consequences of road traffic accidents involving deer. Little is currently known regarding biodiversity costs relating to deer. Policy should enable suitable systems for improved and consistent quantification and reporting of losses.
- 3.3 Deer management policy measures shall aim to maximise the financial contribution of deer related products and services to both rural and national economies. The deer stalking and hunting sector already makes a significant contribution to the rural economy through the sale of hunting concessions, the sale of clothing, equipment, firearms, vehicles, food, drink, training courses and accommodation etc. The non-shooting recreational sector (photography, eco-tourism) also has potential for development.
- 3.4 Policy should strongly support the development of markets for venison, at domestic and international levels. Demand is currently very high on international markets and venison is increasingly marketed as an organic, low fat nutritious meat. Considerable revenue and employment could be gained from implementing strong marketing and quality control measures for Irish venison.
- 3.5 Policy must also recognise that current strong market values for venison have led to an upsurge in both illegal deer hunting and illegal trade in venison. Strong measures are required at all levels to prevent the introduction of illegally sourced venison to markets.
- 3.6 Policy should support enhanced training measures for licensed deer hunters in relation to proper handling of carcasses from time of shooting to final introduction into the human food chain. In addition there is a need for regional larders / check stations where regulatory, quality control and scientific functions can be implemented in a consistent and reliable manner.
- 3.7 The availability of reliable, applied scientific research is crucial for the effective management of deer resources. To date, very little applied academic research is available to support the development of integrated deer management in Ireland. Policy should strongly support and enable appropriate improved applied research in this area.

4.0 Stakeholder Related Principles

Wild deer should be managed in a sustainable manner, that is safe, humane, and ethically responsible, and that maximises the benefits of deer management to society.

- 4.1 The identity of potential stakeholders/stakeholder groups concerned with deer in Ireland must be established as a prerequisite to policy development in consultation with these stakeholders. Following public consultation, a provisional list of stakeholders is presented in section 8.
- 4.2 In developing and implementing deer management measures, the welfare and humane treatment of deer populations shall be paramount. Policy should support training and education measures necessary to ensure that management measures and their implementation conform to international best practice and standards, and comply with existing national and EU legislation regarding animal welfare, food standards and human safety.
- 4.3 Policy should support a public information / education programme on the need for deer management and control.
- 4.4 LAND USE - All relevant land use policies must take account of deer management issues. Best practice models for deer management in Ireland must be developed, in line with suitable examples abroad, and these models must in turn be integrated with existing best practice models across relevant land use sectors.
 - 4.4.1 There is a requirement for greatly improved education and awareness concerning deer management among land use professionals, and among the general public, which will in turn enable the implementation of deer management measures in the field. Long term development of deer management capacity in Ireland will require an appropriate accredited educational framework. This can be integrated with existing 3rd level and Continuous Professional Development programmes.
 - 4.4.2 Policy should support the development of integrated best practice codes for use in the main land use sectors affected by deer populations such as agriculture and forestry, the conservation sector, professional deer management interests, and the recreational hunting sector.
 - 4.4.3 Landowners/Shooting rights – A number of instances have been identified where land management interests experiencing issues with deer populations have been unable to implement suitable controls due to land title issues involving sporting rights. Policy should support measures aimed at exploring this issue in greater detail from a legal standpoint, towards devising an equitable solution to the issue between landowners and the holders of

sporting rights in areas where deer pose a threat to land management objectives.

- 4.4.4 Forestry Issues – Forest practice and design has a major influence on deer population dynamics and behaviour. As such, the forestry sector has a critical role to play in the implementation of deer management through habitat manipulation. There is a requirement for greatly improved education and awareness regarding forest management issues where deer populations exist. Pre-planting design is a critical issue, and appropriately designed forest developments should incorporate an integrated approach to deer management. Features such as fencing, open space reserves, deer lawns, and appropriately sited control infrastructure such as access tracks, hides, and high seats must be incorporated into site design. As in 4.3 above, codes of best practice aimed specifically at the forest sector should be developed.

Policy should also support strong measures aimed at developing professional deer management capacity within the sector, including training and development of deer census and control personnel, and direct involvement of the forestry sector in the development of local deer management groups (See Appendix 4). Policy measures aimed at generating enhanced revenue streams from recreational deer hunting, within a structured deer management environment should also be supported.

- 4.4.5 Agricultural Issues – There is a strong requirement for a greatly improved understanding of deer issues among the agricultural sector, in particular where issues such as crop protection are concerned. Policy should actively support the involvement of landowners in local deer management groups that are capable of implementing meaningful deer management measures at local level (see Appendix 4).

In addition, an improved understanding of the role of deer populations in the transmission of veterinary diseases is required. There is an established link between high density populations of animals, and higher rates of disease transmission. Policy should strongly support the development of contingency planning for the containment of notifiable veterinary diseases in deer populations, should the need arise in the future.

- 4.4.6 Policy should enable the safe management of deer populations along national routes, in conjunction with the National Roads Authority, Road Safety Authority and Local Authorities. Policy should support improved awareness of deer issues among engineering professionals engaged in pre-planning of major road infrastructure through deer hot spots. Codes of practice are required to support integrated roadside deer management including the use of improved fencing design and the integration of underpasses into fenced areas along motorways and dual-carriageways, and the careful planning of roadside planting and signage. Enhanced driver education and public awareness of the potential dangers of deer on the roads should also be supported.

- 4.5 Policy must support a variety of measures aimed at ensuring that food products derived from wild deer populations meet the highest possible standards of quality and safety before entering the human food chain, and that the reputation of Irish deer meat products on markets abroad is fully safeguarded.
- 4.6 Invasive Species – Strong measures are required to prevent the further introduction and spread of illegally introduced invasive deer species, and other potentially invasive species such as wild boar. The introduction of non-native invasive deer species is illegal and highly irresponsible. It can have serious consequences for agriculture (disease and damage), for conservation (damage to conservation habitats and species) for forestry (damage to tree crops) and for existing deer species (potential competition and displacement) and for humans (potential conflicts in urban and sub-urban environments and road traffic accidents). The introduction (or re-introduction) of wild boar should not be contemplated until such time as the proposed re-introduction conforms to strict IUCN guidelines and national and European legislation, in addition to having in place functioning and efficient control measures. Unplanned and irresponsible release or introduction of wild boar will have serious consequences for agriculture (disease and damage), conservation (Natura sites, ground nesting birds and vulnerable plant species) humans (road traffic accidents, conflicts with humans in urban and sub-urban environments)
- 4.7 Recreational Deer Hunting – measures are required to support and encourage the contribution of recreational hunters in achieving desired deer management objectives, and towards integrating recreational hunting activity within a structured deer management environment. This issue is discussed in greater detail in Section 5.

5.0 Recreational Deer Hunting and related issues

Recreational deer hunting should make a positive contribution to desired deer management objectives, and take place within a structured, best practice environment, having due regard for public safety, animal welfare, legal obligations, and the management objectives of lands where hunting takes place.

- 5.1 Policy should allow for a clear distinction between deer control activities carried out in support of land management objectives or public safety; commercial deer management activities carried out for primarily financial reasons and licensed recreational deer hunting, carried out for primarily recreational reasons.
- 5.2 Recreational hunting should not be considered a substitute for professionally applied deer control. However, policy should fully recognise that recreational hunting has potentially a very valuable role to play within a structured deer management environment and objectives in the catchments where deer hunting takes place.
- 5.3 Towards achieving this aim, policy should support measures aimed at improving hunter standards and performance, especially in the area of training and awareness. The need for appropriate training is especially important where safety-critical issues such as firearms handling and carcass handling are concerned. Training also plays an important role in establishing good standards of animal welfare among hunters and ensuring that these are upheld in the long term.
- 5.4 Policy must ensure that appropriate training for hunters must satisfy the needs of recreational hunting, and should also be of sufficient standard to be capable of satisfying the needs of professional operators. Training and assessment must be independent, and subject to accredited certification. Those providing the training must be suitably qualified and accredited to do so.
- 5.5 Given that the majority of deer hunting in Ireland is carried out for primarily recreational purposes, it is recognised that most responsible hunters will be concerned with maintaining a suitable population density for sporting purposes. Policy must ensure that these concerns can be reconciled with the need to control deer numbers to achieve damage reduction goals, or conservation objectives within the catchments concerned.
- 5.6 It is recognised that there is now considerable competition within the recreational hunting sector for space and hunting rights or permissions to hunt deer, particularly in regions close to larger urban centres. There is little regulation in relation to hunting rights on private lands, which may impact on the ability of hunters to apply consistent management from year to year. An organisational structure is required that would permit more consistent management of deer for sporting use over longer periods of time within a structured deer management environment. The adoption and implementation of Deer Management Administrative Areas (DMAA's) is explored in Section 7.

6.0 Policy, Regulatory and Administrative issues

The implementation of a sustainable deer management programme in Ireland requires the establishment of an appropriate policy, regulatory and administrative framework, capable of supporting and sustaining measures on a long term, consistent, basis and in keeping with best international practice and legislative requirements.

- 6.1 The development and implementation of a successful deer management programme in Ireland on a sustainable, long term basis will require significant changes to existing deer related legislation and policy frameworks.
- 6.2 A comprehensive revision of current deer legislation is required in the light of significant changes to land use practice, conservation requirements, deer hunting practice and deer population dynamics since the introduction of the Wildlife Act, 1976.
- 6.3 The current Deer Hunting Licence (DHL) system should be significantly reviewed to incorporate current requirements and to minimise unnecessary administrative overheads. In particular, given recent amendments to firearms licensing legislation under the Criminal Justice Act, 2006, there is a need for the issuing and validity of deer hunting licences to run concurrent with the issuing and validity of firearms certificates.
- 6.4 Separate licensing systems should be developed to distinguish licensed recreational hunting from licensed commercial hunting to aid the regulation of trade in venison and prevent trade in illegally hunted meats. Provision of a valid tax clearance certificate and declarations should be a requirement for commercial hunting licences.
- 6.5 The current system whereby DHL applicants supply details of hunting permissions, places an unnecessary burden on the issuing authority, in terms of administration. It is strongly open to misuse, and as an annual requirement, is in itself a potential barrier to consistent year-to-year deer management on lands concerned.
- 6.6 Policy should ensure that the issuing of future DHL's should operate in a manner that permits greater co-ordination with the issuing of Firearms Certificates, having a three year validity period, and that licences issued should be fit for the purpose of regulating hunting. They should contain weatherproof photographic and smart technology identity elements to assist in the verification of licensees and permits by authorised officers.
- 6.7 Policy should ensure that there is a strong requirement for mandatory training and certification regarding firearms handling safety and proficiency prior to the issue of Deer Hunting Licences. In this regard, there is a need to establish standardised training and assessment structures that are fit for purpose. Training and assessment must be independent, transparent, and subject to accredited certification. Those providing the training must be suitably qualified and accredited to do so.
- 6.8 Any new licensing system should incorporate a requirement to submit detailed records of animals culled, including basic biometric and spatial details. Such data would be submitted electronically by hunters using commercial off the shelf technology. It is felt that the use

of such a system would greatly benefit hunters over time, providing an indication of animal behavioural patterns while, at the same, provide reliable biological data to augment deer density survey data.

- 6.9 Policy should support and enable the introduction of a tagging system for culled animals. Carcass tagging would form a critical element of a set of integrated measures aimed at improving the overall traceability of venison from field to fork and enable the exclusion of illegally sourced meat from markets.
- 6.10 Policy must recognise that the safe use of appropriate firearms is central to any deer policy. As such, policy should support the mandatory safety and proficiency testing and certification of all firearms users involved in professional deer management and recreational deer hunting.
- 6.11 Policy must support measures aimed at improving available training, safety and performance of individuals who may be required to undertake difficult control operations at night or in urban or urban interface areas, particularly where the control of invasive species such as Muntjac is concerned. Strong codes of practice and operating procedures should be developed for operations of this type, and additional appropriate control measures should also be explored.
- 6.12 Policy should address other firearms issues as they relate to deer management, such as the issue of appropriate firearms calibres for smaller invasive species, and the use of shotguns, tranquiliser guns, and appropriate training for personnel using such firearms. This may require amendments to existing firearms legislation. In this regard, the use of vehicles, night-shooting, trapping, tranquilisation and other control methods and associated techniques should also be carefully examined and appropriate codes of best practice developed.
- 6.13 Policy should address the issue of closed season control of deer where damage to crops or forestry is concerned. While control of this type is often warranted, to prevent damage and financial losses, 'damage' should not be seen by hunters as an excuse to extend the hunting season. Control of deer involved in damage to crops or forestry should be carried out by professional deer management personnel under the direct control of the Deer Management Unit.
- 6.14 It is widely recognised that there has been a major increase in illegal taking of deer and related unlawful trade in illegally sourced venison in recent years. This phenomenon is largely due to recent increases in prices being paid for venison. There is also significant evidence of an increase in the illegal trading of venison through non-registered individuals and meat handling facilities. Illegal taking of deer is viewed as a low risk high gain activity by those involved. Such trade and activity endangers public safety, may endanger the image of Irish meat exports abroad, and makes legitimate deer management activities more difficult to implement.
- 6.15 Strong measures are required to make the sale and trade of illegally sourced venison more difficult, and to remove the financial incentives for illegal hunting. Such measures

would include the introduction of commercial hunting licences for those involved in professional venison supply, the introduction of a tagging system for all culled animals, and the development of Deer Management Administrative Areas within which comprehensive anti- poaching measures such as carcass check stations and increased local vigilance and reporting can be employed (see Section 7).

7.0 Development of deer management organisational structures.

A strong organisational framework is required to permit accurate reporting of deer population densities, and enable appropriate prioritisation and allocation of deer management resources to the areas where they are most needed.

With the objective of sustainable deer management in mind, and with the consent and cooperation of key stakeholders, it is proposed to re-develop the existing spatial and administrative framework for deer hunting to reflect similar deer management structures in Europe, and within the game sector in Ireland. It is proposed that this development would take place on phased basis, and would permit a more consistent approach to deer population management and recreational hunting values at local level in areas where deer populations exist.

The proposals in this regard are as follows:

- 7.1 A critical first step must be the establishment of a full time National Deer Management Unit (NDMU) that will co-ordinate the implementation of deer management policy at national, regional and local levels. Any such unit could make use of existing staff and skill sets within DAFM and NPWS, and other relevant statutory bodies, as may be required. Given the land management, animal health and food safety issues concerned the Department of Agriculture, Food and the Marine is viewed by the IADPG as being the most suitable Department to host such a unit.
- 7.2 Consequent development and implementation of a suitable deer management system in Ireland, capable of reducing wild deer populations to sustainable levels and subsequently maintaining them at these levels, will require the concurrent development of the following elements:
 - A. An informed, structured, deer management culture in Irish agriculture and forestry sectors, as these are the main land bases providing habitats for deer populations in Ireland and are the sectors most affected by deer populations at an economic level. Appropriate, applied research on specific issues could be provided by third level institutions at the request of practitioners to support decision making in respect of conservation and economic aspects of deer management.
 - B. Spatial administrative structures and data management infrastructure to enable an ongoing assessment and evaluation of deer populations at catchment and sub-catchment level in the Republic of Ireland. Co-ordination and co-operation with Northern Ireland authorities in the development of similar systems in order to achieve an all-island response.
 - C. The expansion of catchment based Deer Management Groups, analogous to those currently being piloted in Co. Wicklow, in areas where high density deer populations impact on land use objectives, integrated with the systems and spatial structures at B. above.
 - D. The re-structuring and development of existing Irish recreational deer hunting practice based on, and integrated with, the systems and spatial structures at B. above, to enable localised, but highly structured, organised culling by trained

hunters of pre-determined numbers of specifically targeted classes of animals, on a sustained multi-annual basis, and in a centrally co-ordinated manner.

- E. The development of centrally controlled professional deer control capabilities, capable of augmenting B, C and D. above, where and when required.
- F. The development of a suitably scaled and configured supply chain and support systems capable of bringing wild Irish venison to domestic and international markets at the quality standards required of these markets.
- G. The concerted development of tourism, sporting and food processing markets associated with wild deer, with a view to maximising rural employment and benefits to the rural economy arising from deer and their management.

7.3 How such a system might operate:

- 7.3.1 Phased Introduction of **Deer Management Administrative Areas (DMAA's)** based on major River Catchments. NPWS, Forest Service and Coillte spatial management structures are likely to be revised to reflect catchment based approaches to land management and it is therefore appropriate that deer management implementation operates along similar landscape structures.
- 7.3.2 Within DMAAs identify **Deer Management Units (DMU)** based on minor River Catchments.
- 7.3.3 Use of GIS to determine and delineate Deer management unit boundaries at four distinct scales – DMU, District (DDMU), regional (DMAA), and national level.
- 7.3.4 All lands, including forest properties, Coillte deer leases and licensed deer hunting on private lands within DMUs would be included in the overall deer management strategy for that DMU. This would be supported in law by a suitable statutory instrument issued under the aegis of the Forestry Acts, or under the Wildlife Acts.
- 7.3.5 Implementation would take place on a phased basis, based on analysis of land use types, estimated population densities and vulnerability to deer. GIS techniques would be used to identify key threat areas and implement control measures accordingly – look at vegetation maps – designated habitats, agricultural holdings, forestry units.
- 7.3.6 Where possible, spatial, legislative and management structures should be mirrored within Northern Ireland, in order to effect a consistent all island approach.
- 7.3.7 For each DMU, carefully selected and specially trained personnel would be appointed as Deer Managers (DM). The function of the deer manager would be to assess the deer population level for a given DMU and, based on this assessment, assign a suitable cull target for that catchment. The DM would ensure the quality of data submitted to a national deer management

database, and ensure that cull targets are achieved by trained hunters operating in the given DMU.

- 7.3.8 Deer Managers could be drawn, but not exclusively, from existing personnel within DAFM, NPWS and from the DAFM registered foresters list on a voluntary basis. All personnel would be subject to an appropriate code of conduct. All such personnel would be trained to a recognised standard using a curriculum developed jointly by DAFM/NPWS.
- 7.3.9 Deer density assessments would be carried out on the basis of each DMU using established and most effective deer census/population assessment techniques, and verified using established data quality control measures.
- 7.3.10 Using deer density data from **DMU's**, National Deer Management Unit would agree and allocate appropriate cull levels for each DMU.
- 7.3.11 A national deer carcass tagging system should be introduced jointly by NPWS and DAFM. Carcass tags will enable improved control of deer poaching and verification of Section 29 hunting returns by licensed hunters to NPWS at the end of each hunting season. Tagging would form an element of food traceability systems operated by DAFM, and would also enable cull levels within DMU's to be controlled and verified. Tags would only be issued up to the level of the cull planned for any given DMU in a given season or year. Tags would relate by a numerical index to each specific DMU, and contain QR label technology or similar and permit geo-referencing of cull returns from hunters and management groups.
- 7.3.12 Recreational hunters operating in **DMU's** would be allocated tags according to target harvest levels. Each hunter would be allowed an agreed minimum quantity of tags without charge at the beginning of the hunting season, based on the allocated cull. Unused tags must be returned and accounted for at the end of the season. Tags would consist of trophy tags, which would have a fee attached, and hind cull tags which would have no charge attached. Additional tags over the allocated cull limit would carry a commercial fee.
- 7.3.13 Licensed commercial hunters and commercial operators catering to hunting tourism would be allocated tags under a commercial fee structure. Tags would only be issued to commercial operators on receipt of a current tax clearance certificate.
- 7.3.14 All licensed hunters would be allowed access to the primary tier of the national deer management database for input and personal recording, and generic local level reporting. Suitable software is currently available off the shelf to provide the type of software infrastructure required and would require minimal additional development work. Additional modules would permit reporting of damage severity and location by land managers within the catchment. Access and reporting would be available at hunter, land use manager, Deer Manager and regional and national level. A strong spatial analysis element should be built in to the IT system and should be inter-operable with GIS systems used by both departments.

- 7.3.15 Access to an on-line log book would be made available to each licensed hunter to be filled in for relevant season and submitted as part of an integrated Deer Management Information system. Hard copy log books would also be available to those not wishing to use an electronic format.
- 7.3.16 A network of regional / district larders (check stations) i.e. DAFF / Local Authority approved larders would be developed, particularly in high density catchments. Portable/mobile larder- check stations are available and could be LEADER funded as local enterprises. Venison carcasses would be not sold or exchanged without valid tags and background data. Smart QR technology would minimise paperwork and administration requirements at larders and permit continuity of data management and traceability throughout the food chain. It should not be possible to sell or trade in deer carcasses not having the appropriate tags, which would limit outlets for poached or illegally shot deer.
- 7.3.17 Recreational deer hunters would operate at DMU level through a club system, analogous to existing current structures such as district gun clubs. To obtain a licence and tags to hunt in a particular DMU, hunters will have to join the club for that particular DMU. Clubs would operate under the aegis of a suitable national body. DMU hunters will be responsible for anti-poaching measures within their own catchment, under the guidance of the DM and in conjunction with the relevant authorities NPWS/Garda Siochana.
- 7.3.18 Training – hunters would be trained to familiarise them with the system, how to collect basic data and ultimately become deer managers themselves within the system. Foresters, farmers and other land managers would also be trained to become deer managers using training courses specifically designed for Irish conditions delivered by competent and qualified persons.
- 7.3.19 The system could be initially funded by the agencies concerned in the initial start up-phase. Fees for training, DHL fees, DMU or DMAA membership fees, and commercial operator fees would generate revenue that can in turn be used to administer the system. For example, with 5,000 registered hunters, a €100 DHL fee would generate €500,000. This fund could in turn cover provision of deer manager expenses, training and IT infrastructure.
- 7.3.20 A high degree of land owner and hunter buy-in is required for the system to work. The main selling point to landowners is a reduction in deer populations over time and better regulated hunting and improved revenue streams. For hunters a reduction in deer poaching, better structured and consistent multi-seasonal hunting and more secure lease arrangements and more consistent population management for sporting purposes will be the main benefits arising. The introduction of any such system should be overseen by a board comprised of officers of the main Departments concerned, and representatives from stakeholder bodies.

8.0 Stakeholder Group

It is proposed that deer management policy development and implementation would be best progressed within an external partnership arrangement comprised of representatives of sectoral interests and stakeholders, overseen and facilitated by the Department of Agriculture, Food and the Marine and the Department of Arts, Heritage and the Gaeltacht.

As part of a public consultation exercise carried out in October/ November 2011 groups and individuals concerned with deer management issues were invited to present submissions to the Department of Agriculture, Food and the Marine for consideration prior to commencement of policy development.

In addition, expressions of interest were invited from groups or individuals who wished to be considered for further participation in the development of Deer Management Policy, in conjunction with the Departments concerned. Following from this, the following potential stakeholders have been identified:

Irish Farmers Association	Coillte Teoranta
Irish Creamery Milk Suppliers Association	Deer Alliance
Birdwatch Ireland	Wicklow Deer Management Group
Irish Wildlife Trust	Roundwood IFA
Irish Deer Society	Manor Kilbride IFA
Wild Deer Association of Ireland	Mr. John Fenton
National Association of Regional Game Councils	Association of Irish Forestry Consultants
Wicklow Deer Group	Mr. Paul Cullen
Countryside Alliance Ireland	Capt. Neil Forde
Irish Timber Growers Association	Dr. David O'Brien
Society of Irish Foresters	Dr. Tom Hayden
Woodlands of Ireland	Jim Walsh MRCVI
Teagasc	Food Safety Authority of Ireland

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Forest Commission / Forest Research www.forestresearch.gov.uk

The Deer Initiative www.thedeerinitiative.co.uk

Natural England www.naturalengland.org.uk

Scottish Natural Heritage www.snh.org.uk

British Association for Shooting and Conservation (BASC) www.basc.org.uk

Macaulay Land Use Research Institute (MLURI) www.macaulay.ac.uk

Scottish Native Woodlands www.scottishnativewoods.org.uk

National Trust for Scotland www.nationaltrust.org.uk

Appendix:

Deer Species and Distribution, Introductions and Genetic Integrity Issues

There are currently 4 known species of deer existing in the wild in Ireland (Red, Sika, Fallow, Muntjac) in addition to unknown populations of Red x Sika hybrids. Rumours of recent introductions of other species (roe and Chinese Water deer) are as yet unconfirmed.

Geographic distribution of all species of deer in Ireland has yet to be comprehensively established. There have been some attempts to capture existing data on deer distribution both from known records and Section 29 Deer Hunting Licence (DHL) returns from hunters. While this data has given some insight into the distribution of Red, Sika, Fallow and Hybrids, until a systematic countrywide survey has been completed these data will only reflect the partial distribution of all deer species, and data collection will continue to be overly reliant on hunter returns.

Red deer (*Cervus elaphus*) – Current distribution 84 x 10k squares¹ but have been recorded from Sec. 29 DHL returns² in all counties. It is expected that red deer will continue to expand their distribution and population size under current conditions. However, much of the recent increase in distribution can be attributed to assisted dispersal mostly from captive populations from deer farming enterprises.

Challenges: Protection of the Killarney red deer population from the threat posed by hybridisation with sika deer, in addition to threats posed by introduced red deer of unknown genetic background. Management challenges include negative impacts on priority conservation habitats and species, a perceived threat to agricultural enterprises among local landowners, in addition to risks posed to road users in the localities where these deer exist.

Explanatory Notes

1. Deer Distribution Data on deer distribution are derived from a combination of sources: NPWS National deer database, The Badger and Habitat survey of Ireland 1995, Coillte deer database. Deer distribution has also been recorded from Deer Hunting Licence (DHL) returns. However, this data can only be used for comparative purposes as it relies entirely on the skill levels of individual hunters and their ability to accurately determine differences between deer species.

2. Estimated population size Figures are based on an estimated average annual off-take of between 8-10% of the total deer population (all species). The total numbers of deer shot are submitted at the end of each season by deer hunters on their DHL (Deer Hunting Licence) returns. However, it is important to note that while the submission of deer hunting licence returns is mandatory, the information provided on total deer shot is at the discretion of the individual making the return. It is accepted that an unknown number of returns are both under-reported and over-reported. Accuracy of DHL returns is therefore somewhat subjective but is currently the only data source available to NPWS on deer culled within the State. Nevertheless, DHL returns have remained remarkably consistent over the last 15 years.

Sika deer (*Cervus nippon nippon*) Current distribution 85 x 10k squares¹ but similar to red deer have been recorded from Sec.29 returns² in all counties with the exception of Co. Louth. Sika are the

most numerous deer species in the country accounting for almost 50% of the total deer population in the country. The natural capacity of Sika deer to expand and adapt to habitat change is greatly exacerbated by land management practices that have combined to create a habitat matrix ideal for colonisation by Sika deer.

Challenges: Sika deer present a major challenge to sustainable land management. Given their adaptability as a species, it is expected that Sika deer will continue to expand their range and population size for the foreseeable future. To date, culling regimes aimed at reducing Sika deer population densities generally fall far short of requirements for this species. Management challenges include the negative impacts on conservation habitats and species, forestry and agriculture in addition to their high reproductive capacity and the ability to hybridise with red deer.

Fallow deer (*Dama dama*) Current distribution 158 x 10k squares¹. They have been recorded from Sec.29 returns² in all counties with the exception of counties Louth and Wexford. Fallow deer are the most geographically widespread species in the country and account for about 41.1% of the total deer population in the country.

Challenges: Under current conditions, Fallow deer are likely to continue to increase in distribution and population size, again due to the increased presence of suitable habitats. At medium to high density, fallow populations are likely to have significant negative impacts on conservation habitats and species, forestry and agriculture.

Muntjac (*Muntiacus reevesi*) A species recently introduced to Ireland, there have been many reported sightings of Muntjac in different parts of the country. These include counties Clare, Offaly, Roscommon, Donegal, Wicklow and Wexford. Returns from Sect. 29² show Muntjac specimens have been shot to date in counties Clare, Kildare and Wicklow. Due to their secretive nature and small size, it is unknown to what extent Muntjac has been released throughout the country. Without sufficient surveillance resources, monitoring the spread, potential and real impacts of this species into the future will be problematical. Only increasing numbers of Sect.29 returns from different locations may give some indication as to how widespread and numerous this species is likely to become.

Challenges: Experience from other countries (esp. UK, with similar landscape and weather conditions to Ireland) has shown that this species can rapidly increase its range and population size due mainly to its' high reproductive capacity and assisted dispersal. Its small size (equivalent to

Labrador dog) and secretive nature makes direct detection of this species almost impossible. The current population size estimate is thought to be < 100 animals but this figure is likely to increase dramatically over the next five years. As highly selective, yet voracious grazers, future management challenges may include negative impacts on conservation habitats and species, secondary impacts on priority conservation species, in addition to economic impacts on forestry and agriculture.

Red x Sika hybrid Current distribution 64 x 10k squares¹. Data from Section 29 Deer Hunting Licence returns suggest that red x sika hybrids have been found in all counties with the exception of Longford, Louth, Mayo, Meath, Roscommon and Waterford.

Recent Introductions from Abroad

There have been two well known introductions of exotic deer species in the 19th century and other more recent introductions within the last two decades. Sika deer were introduced into Ireland by Lord Powerscourt in 1860 and a second introduction of this species was made by Lord Landsdowne in 1897³. Between 1987 and 1995 it is known that almost 7,000 Red Deer Specimens were imported into Ireland for deer farming purposes, and a number of these animals were subsequently released or managed to escape into the wild, and now enjoy a widespread existence as feral populations. It is thought that Muntjac (*Muntiacus reevesi*) was introduced illegally into Ireland by persons unknown sometime between from 2000 up to and including 2006. It is unknown if further introductions of this species have taken place or to what extent they have been deliberately released in various parts of the country. Illegal introductions of Roe deer (*Capreolus capreolus*) and Chinese Water deer (*Hydropotes inermis*) may have taken place in the last number of years, but this has never been confirmed.

Increased vigilance by relevant authorities in both Jurisdictions will be required to ensure that no further illegal introductions of exotic deer species take place onto the island of Ireland, and that existing populations of farmed and captive deer are managed in a secure and accountable fashion.