

COUNTRYSIDE ALLIANCE IRELAND

Love the countryside

Draft Deer Management Policy Vision
(Second Draft, September 2012)

A response by:

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Friday 12 October 2012

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

To Whom It May Concern

Ref: Draft Deer Management Policy Vision

Countryside Alliance Ireland (CAI) is an expert and informed rural campaigning organisation, representing over 10,000 people throughout Ireland. We, and our members work, live and participate in recreation throughout Ireland and our interests and expertise are directly relevant to this consultation.

Countryside Alliance Ireland welcomes the opportunity to participate in the consultation process and we hope our input is valuable.

If you require additional information, or should you have any queries, please do not hesitate to contact us on 01690 3610.

Yours sincerely



LYALL PLANT
Chief Executive

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Introduction

Countryside Alliance Ireland (CAI) is an all-Ireland membership organisation with 10,000 individual members and over 25,000 affiliated members. We reflect the views and concerns of a broad range of rural people and their livelihoods.

Our vision of a vibrant and diverse countryside is based on the principle of responsible and sustainable use of our natural resources, coupled with local community support through meaningful consultation and proper stakeholder participation.

CAI regularly partake in, and host, conferences and forums discussing many topics relevant to the integration of country sports with sustainable wildlife management. For these reasons we have the expertise necessary to comment, for both the organisation and our members, and to make recommendations on the Draft Deer Management Policy Vision.

Firstly, we commend the Department of Agriculture, Food and the Marine (DAFM), and the Department for Arts, Heritage and the Gaeltacht (DAHG) for developing a second Draft Policy Vision for Deer Management in Ireland. This has been long overdue and CAI therefore supports the initiative.

We would however like to see a more detailed and thorough explanation of what the Draft Deer Management Policy Vision literally proposes and how these proposals are to be implemented.

Within the second Draft Policy, CAI has further concerns, recommendations and comments (as outlined below).

However, one overriding factor which must be given priority consideration throughout, is the impact the Draft Policy will have on the recreational deer hunter. It will not be acceptable for recreational deer hunters to be unduly penalised through increased costs; whether from licensing fees or the costs associated with accredited training schemes/certification as this would severely prohibit this activity for many. The policy while meeting the needs of the framework '*for sustainable wild deer management in Ireland*', needs to be balanced and mindful in this regard.

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.

To develop a sustainable deer management policy, an accurate account of the deer population must be swiftly evaluated. Using valuable voluntary/professional time and department funds, these resources must be used efficiently to assess deer population in a timeframe period of 3-5 years. Small sample exercises will provide no accurate information that will help in a long term deer management setup.

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.

CAI is pleased that the deer policy group has recognised the financial benefit that deer stalking and the hunting sector has to the rural economy.

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.

CAI is delighted that the policy has recognised that illegal trade is taking place due to a strong market value of venison and the (current) minor penalties applied to poaching. By increasing the penalties of poaching and traceability between the hunter and game dealer per each purchased game, this will help lower illegal trade and also poaching for personal consumption.

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.

CAI agrees with the policy that an appropriate educational framework for all DHL holders must be undertaken for long term deer management, however, CAI would like more clarification in what this would involve and how this would be tasked.

It is also important to note that many deer hunters have years of practical experience although may not have accredited qualifications such as HCAP and this experience must be taken into account.

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.

CAI would like to be given examples where issues have been identified and what policy support measures are envisaged to reconcile possible conflict areas.

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.

Forest design is the key long term practical method for many of the deer management's objectives. Deer lawns will not only provide more safe areas for culling, but will help in monitoring deer population. Forest design must be looked at immediately for long term deer management.

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.

CAI is again pleased to read that the deer management policy group appreciate and understand the key benefits of recreational deer hunting.

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.

CAI is mindful that public safety is of paramount importance. However, the DMU in each area should build in contingency in this regard.

Guidelines must also be issued to ensure that the policy is fair and that commercial hunting does not take precedence over recreational hunting purely because it will secure more income for the government.

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.

This statement is somewhat ambiguous and clarification and guidelines must be issued to outline when professionally applied deer control would be invoked as the only option.

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.

The Policy must address the possible abuse of Section 42 of the Wildlife Act to extend season for personal gain. This should only be issued at last resort once legitimate methods have failed. Permits should only be considered to skilled DAHG staff.

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.

Separate licensing systems would make sense to ensure commercial hunters are complying with income taxation etc. However, we do not believe that this separate licensing system will prevent poaching and the trade of illegally hunted deer.

We suggest that commercial food establishments who buy and sell game should keep a record of all transactions and the audit trail would be available for inspection by the relevant authorities. We would also recommend that commercial food establishments and game handling establishments can only pay for game via a traceable cheque and not cash.

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.

The current system is not working and needs radically upgraded. The system should be strengthened to take into account of future kill targets per the amount of animals in that area, therefore the administration of deer licenses must lie with the issuing authorities.

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.

CAI stresses the requirement for mandatory completion of the HCAP as the required standard before issuing a DHL. To help prevent poaching, this should be top of the criteria to be set in stone as soon as possible. Completion of a training certificate to awarded persons' will also provide the opportunity to educate in all aspects of the objectives we require the professional/recreational deer hunter to carry out. From database input and to on-line log books we must start immediately to use "on the ground" personnel to achieve our objectives.

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.

CAI supports the prerequisite for tagging systems. This can only be achieved once deer densities per DMU is achieved and can set out the harvest levels for the given area. This is a long term objective that will also help DAFM trace carcasses. In addition, mandatory tagging may serve as a deterrent to illegal hunting/ game handling. These tags should be issued by the Department at the same time the DHL is issued.

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.

Many stakeholders including WDAI and the IDS would be able to educate in best practice of control methods and techniques. CAI fully disagrees with any proposal to amend the wildlife act to allow

use of what we believe to be unethical methods and techniques, including night shooting and other control methods. We would ask the Department to clarify what is meant by 'other control methods and associated techniques'.

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.

CAI would like country sport stakeholders to be included within the NDMU and to have full involvement within the development of the deer strategy. Stakeholders like CAI, WDAI and IDS represent many of the recreational hunters who would be affected by this policy.

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.

CAI would like to stress the point that not all private landowners would be supportive of culling on their own land. Alternative ideas must be considered to educate (where necessary) private landowners the need for responsible deer management.

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.

Again, like point 7.1A, CAI would like relevant stakeholders to be represented for the interest of all parties.

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.

Additional tags requested over the allocated cull should be assessed by the local Deer Manager within that DMU before granting. A commercial fee to obtain more tags could result in over cull for the allocated area.

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.

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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.

On-line and hard copy log books should be made an obligation to access a DMU population, to further develop and sustain a long term deer management objective.

CAI also asks the question, will licensed commercial hunters/operators be given first priority of the allocated tags per a DMU as opposed to recreational hunters?

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.

CAI does not agree that the administration for recreational deer hunters to apply for a licence should lie with local/district gun clubs. To ensure consistency of approach in terms of standards, fairness and so on, this must be a responsibility for the National Deer Management Unit, in conjunction with Coillte and the other government departments as necessary.

Local/district gun clubs vary in their approach and at times may be subjective. To insist that all recreational deer hunters must join a club within a DMU will prove prohibitive for many and indeed undemocratic.

CAI also disagrees with the choice of word used within the above text. "Responsible" is a poor word that can be read and used out of context. Poaching is an illegal crime that should only be dealt with by NPWS and An Garda Siochana. Responsibility for anti-poaching measures can be upheld by recreational hunters, but strong support and education must be provided by NPWS/Garda Siochana. Other methods to prevent poaching must be considered such as DAGH working to increase the penalties for poaching, public campaigns of awareness and a poaching hotline. Deer poaching initiatives such as WDAI's "Shine a light on poaching" will help increase public awareness and decrease the incentive for illegal poaching.

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.

CAI disagrees with the proposed idea to fund the system with the agencies concerned. The system should be funded by the two inter agencies until valid evidence confirms that the management system is effective. Also, it states “fees from DMU or DMAA membership fees”. If a future fee was to be taken, it can’t be taken as either a DMU or DDMA membership fee, because many DHL holders could be culling within many different DMU’s or DDMA’s. A first time DHL fee, must be considered only at last resort. The recreational deer hunter is one of the major human resources the deer management scheme has. We must encourage numbers to continue with affordability and currently, no other shot game has an exclusive charge. Therefore, especially in these current economic times, extra costs will increase the likelihood of more hunters to poach.

CAI appreciates that all agencies concerned should pay equally for their role in long term sustainable deer management, but until a working scheme is functioning financially, an uncalculated figure, especially under the current economic environment, can’t be estimated.

Conclusion

CAI believes that an appropriate and comprehensive Draft Deer Management Policy in Ireland is justly needed and, if implemented correctly, would adequately assist in protecting the country’s deer populations. However, this outcome wholly depends on full consultation and engagement with key stakeholders.

We are fortunate in Ireland to have many organisations and bodies with extensive knowledge of deer ecology, habitats and management. Our Government should therefore fully exploit this advantage and use this expertise to develop a thorough and pertinent strategy.

As a country sports organisation, CAI was pleased to see the Departments’ recognising the benefits of deer hunting. These hunters provide economical, environmental and social benefits to the surrounding areas and indeed Ireland as a whole. The practice of deer hunting or stalking should therefore be nurtured and used to implement areas of the strategy, especially as this is usually done at a minimal cost to the Government.

We are extremely concerned regarding the high levels of poaching incidents taking place throughout Ireland at present. There is a clear need for this to be addressed within any deer management strategy developed, and we would like to see a more detailed outline of how the Departments’ plan to tackle this problem.