

To whom it may concern,

Regarding the draft of the Draft Deer Management Policy Vision draft discussion document and the call for feedback regarding it, I would like to submit the following comments and opinions.

I would first like to congratulate the IADP group for moving the process forward. I must also extend my regrets at being unable to attend the recent meeting.

I think that the Draft Deer Management Policy Vision is a great step in the right direction and a much-needed proactive stance concerning the progress we must make if we are to successfully confront the looming deer management problems we are faced with in Ireland.

I am in agreement with the broad aims and strategies put forward to achieve those aims.

Nevertheless, there are some points within the document that I consider problematic or which I believe could be better focused, or might be worth revising or reconsidering before the document is finalised. The simplest manner in which to examine these is individually, from the beginning of the document.

The overall focus of any deer management strategy, and thus its vision, must be, at least in the short term, the significant, not to say drastic, reduction in deer populations across much of their distribution. The document states that annual deer harvests are currently around 10% of estimated population. Considering that at least the sika in a number of counties have a potential rate of increase of 28% each year (O'Brien et al., 2007) the deer population has been increasing each year for decades and is now having a detrimental effect on forestry and the ecosystem.

Any ambiguity in the document that might be interpreted as a potential avenue to maintain the status quo must be identified and modified so that all stakeholders are clear that responsible deer management in Ireland for the near term means sharply increasing (which in some cases will mean a doubling or tripling of) harvests until populations are reduced to a point where they do not negatively impact on forestry, farming or other species in their ecosystem.

It is with this overall concern in mind that I address the following points that should be taken note of and potentially amended or addressed before the document is published:

3.5. The upsurge in illegal hunting and illegal trade in venison has also been affected by the downturn in the economy, by the increase in unemployment - which makes poaching an obvious and easy option if someone does not have a job to attend - and the absence of due control over game dealers, which have allowed unscrupulous dealers to accept large numbers of carcasses from hunters with no questions asked. It has also been a consequence of insufficient preventative action on the part of the Gardaí.

3.6. I suggest that any hunter who wishes to sell a deer carcass to a game dealer must show some sort of documentation attesting to his/her having received such training (as is given in many deer management courses, such as the DMQ training under the British Deer Society).

4.3. I wholeheartedly agree with this statement and suggest that this be the most important focus of any national deer management group.

4.4.4. This has long been a significant problem regarding deer management in Ireland, while in other countries forestry companies and their employees have been implementing responsible forest design for a number of years.

I suggest that while revenue streams from recreational deer hunting may be feasible within a structured deer management environment, the primary focus of any forestry enterprise must be the growing of quality trees and timber. We must ensure that, rather than an extra revenue stream, recreational deer hunting is seen as an aid to this end, one which has the potential to reduce deer-management costs that might otherwise be necessary in fulfilling the landowner's responsibility in the care of the ecosystem and following Forest Service rules and regulations.

The obvious contradiction between charging recreational hunters inordinate fees (usually linked to the number of deer that can be harvested, and hence current density) and expecting them to do the foresters' deer-management work in reducing that density to levels where trees are not damaged, has been one of the contributing factors that has led to our current deer management crisis.

4.6. It is lamentable that strong control measures were not in place to prevent the escape of exotic deer species from farms. The deliberate introduction of exotic deer species for recreational hunting, if this is verified, will have been the result of a lack of consciousness of the responsibilities hunters must have for their environment, as an integral part of that (albeit modified) natural ecosystem. Whether from ignorance of the potential and probable dire consequences of such introductions or a blatant disregard for that environment, only education of the general public and hunters can create a culture where such behaviour is unconscionable. Believing that the natural environment exists for one's personal enjoyment without a corresponding responsibility to it, is the result of a long history of bad land-management practices on the island.

The discussion of wild boar and their possible reintroduction is out of place in a document concerned with deer management. Deer have been expanding in their range and numbers for decades in conjunction with the expansion of the forest coverage of the country. They have been, for all intents and purposes, ignored during most of that time and we are now reaping the results of that in terms of the current deer management crisis. Now is not the time to be distracted by other types of ruminants. The muntjac introductions are much more important and worrying, and an attempt to reduce their spread should be given the greater part of our attention and manpower.

Legislation should simply prevent the farming of any ruminants other than the domesticated species and the three accepted species of deer that already inhabit the island. The farming or owning of wild boar and any other deer species should simply be, (and have been before these escapes/introductions) illegal. For it to have been permissible to keep muntjac on a farm on the island of Ireland when the devastation the species was causing in the British countryside was well known, was and is, completely ludicrous.

4.7. It is vital that this point be promoted to the fullest measure and with that in mind, there are several inconsistencies and problems with the points made in section 5....

5.1. Harvesting deer is done for several reasons, depending on the circumstances. However, the effect is the same no matter who is harvesting or why: deer numbers are reduced. I believe it can be enjoyable whether strictly for recreation or not. Hunting creates wealth for the commercial hunter, but can only take place on lands where the population is high enough to sustain it, i.e. where deer need to be harvested to reduce or maintain population densities. Where deer numbers need to be reduced or maintained, deer harvesting will have its beneficial effects on public safety and land management activities.

Therefore, creating distinctions between reasons for hunting is not only unnecessary, it is counterproductive and serves only to introduce another level of complexity that will further hinder measures to reduce the deer herd.

5.2. Similarly, as discussed above, recreational deer hunting can indeed be a substitute for (or be the very same thing as) professionally-applied deer control. If a Deer Manager, as described in section 7, is keeping track of the local deer population in a DMU, the recreational hunter is doing the same thing as a professional hunter: harvesting deer according to a management goal.

5.3. The word “awareness” in the second line needs to be explained: awareness of what?

I suggest that the hunters are already handling their firearms; more training in that area is unnecessary. Irish hunters have an exceptional record in terms of gun safety. With regard to carcass handling, I agree that such training is paramount if the carcass is to enter the general food supply (not simply for personal consumption) and reiterate my suggestion in point 3.6, above, that verification of such training should be requisite for the sale of deer to game dealers or other retail establishments.

5.4. Much thought must go into answering the question of who is to provide training. The last sentence of the paragraph begs the question as to who will accredit the training providers....

The number of deer hunters in Ireland is small compared to most other countries. There are few individuals who stand out as being more experienced than their peers and fewer still who would have any accreditation superior to many others. This is not a criticism. I believe a large number of hunters are sufficiently skilled to provide training to new and novice hunters. These individuals have been training new hunters all along. I do not subscribe to the view that there are a lot of hunters who have guns and hunting licences and go out into the countryside alone and in ignorance of what they are to do if they spot a deer, nor how to grallach one if they are lucky enough to hit it with a blind shot. Hunters go hunting with other hunters and learn from them. A system akin to apprenticeship has been the means of training a large number of hunters: observation of, instruction by and practice with other hunters who have been harvesting deer for decades. Many of these hunters have also, for their own interest, received training in deer-management practices and carcass handling (e.g. DMQ, as mentioned previously). Using this pool of talent is, and will be, much more beneficial to promoting good management

and practices than will a copy-cat training course given by someone with a doctorate from a university who has no such on-the-ground experience.

5.5. There are a number of words in this paragraph that need clarification and further explanation: the adjective “responsible” hunters, the adjective “suitable” population density, and the adjective “sporting” purposes. Why are these words used? They are too ambiguous. What is a suitable population density? That would depend on the situation and the purposes, but for our purposes of deer control and management, “as low as possible” must be our answer. What is a responsible hunter? “One who understands and accepts that deer densities must be kept low enough to prevent them negatively impacting their habitat and other stakeholders besides the hunters,” is the answer I would give. Such densities are, I consider, much lower than that which would be optimum for sporting purposes. Indeed, for sporting purposes, a hunter would be happy with the status quo: for never have deer densities been higher.

I suggest that the primary focus of any management effort in Ireland be, apart from education of the general public, the persuading of our recreational hunters (some of whom already are onboard with the idea) that the long term good (if not survival as we now know it) of their hobby relies upon their accepting of the need to reduce populations to the point where it becomes quite difficult to harvest individual animals, and the hunting effort per deer harvested is much increased relative to the current situation. They must become what I describe above as "responsible" hunters.

5.6. The phrase "management of deer for sporting use" requires clarification. Deer management must be for the good of all, including other wildlife. I would contest the possibility of management for sporting use within a structured deer management environment. They are mutually exclusive. The current lack of structured deer management is highly conducive to sporting use. Tenure on lands, whether private or public, should be contingent on contribution towards good management, not on paying a higher fee than competing hunters.

6.3. The changes to deer hunting licences to run concurrently with gun licences is problematic if hunters are to change the lands they hunt from year to year (an undesirable event, but probable one). If hunters were issued (after paying a fee) a licence that did not have any particular land connected to it, it might be easier. Hunters would carry their gun licence (in card form), their hunting licence (also in card form, as I assume is meant by the description in section 6.6, although why it states that deer hunting licences of 3 years in duration would be more coordinated with gun licences that are issued for 5 years must be clarified) and a written permit for the particular lands they hunt on. This would reduce the administrative burden on the hunting licence issuing authority (stated in section 6.5.).

6.4. The implementation of separate types of deer-hunting licences is a truly unnecessary burden.

I believe there are other ways to aid the regulation of trade in venison. The focus of this should be the Game dealers, who control the money that is paid out for venison. If game dealers were required to take the details of all hunters who sell them venison, using their deer-hunting licence number (or the PPSN number), it would be much less

complicated to control, given that there are much fewer game dealers than even commercial hunters. All hunters should be permitted to sell the extra venison they cannot consume themselves, if the meat is suitable to enter the retail food chain.

Most hunters will not want to sell their extra venison for profit, but simply wish not to waste the meat. The vast majority of recreational hunters are extremely conscientious about this.

If game dealers were to take the tax on the profit that any hunter would presumably make on the sale of carcasses from the money they pay each hunter, and to pay that directly to the revenue commissioners, in the same way that bookmakers take the profit on any gambling wins, the problem of illegal hunting and sale of carcasses for profit without paying the requisite taxes would be significantly reduced. It would also enable Deer Managers to compare deer carcasses sold by a hunter with the number of deer to be harvested on the hunter's Deer Management Area. Any hunter who believes he or she should not have paid the tax due to overall low earnings can claim the tax back from the deer he has sold during each tax year at the end of the that year.

6.5. Clarification on how and why the current system is open to misuse would be welcomed, as would the reason it is a potential barrier to deer management. If licences are to be issued for 3 years (or 5: see point 6.3 above) does this mean that landowners must grant permission for those 3 years? If a landowner sees that the hunters are not doing their job of harvesting, is he or she bound to keep the same hunters for another two years? Or, is it envisioned that landowners would hand over all responsibly for and control of deer management on their property to the DM of their DMA?

6.6. See point 6.3 and 6.5.

6.7. Training is required for new hunters. If it is decreed more efficient to have a course prior to granting of new licences, than have beginning hunters be trained by other, experienced, hunters in the way described above (point 5.4), then it is to be welcomed - but only in addition to such practical "apprenticeships". On the other hand, mandatory training for hunters who have been harvesting deer for numerous years (and have probably attended other, more intensive, training courses) is not only unnecessary, it merely adds to the bureaucratic burden that was mentioned previously. These experienced hunters should be "grandfathered" in to any such mandatory training scheme.

6.8. This is a potentially beneficial advance, but will require much coaxing and convincing of hunters.

6.9. This point is discussed in detail in point 7.3.11, but questions arise as to whether tags would be for a particular hunter or a deer management area, and whether commercial licence tags would be needed to sell a deer carcass.

6.10. This seems to be merely repeating point 6.7 (one of several instances of overlap and repetition in the document).

6.11. The word "individuals" instead of "hunters" needs explanation.

I repeat that energy must be invested in the education of the general public, rather than reiteration of training many hunters have already had.

6.12. The use of shotguns must be discouraged, even for smaller invasive species, such as the muntjac. A minimum calibre of 22.250 in a centre-fire rifle is regarded as appropriate for that species.

6.13. The use of inverted commas for "damage" is questionable. The hunters do not decide what "damage" is or what its level is, or what level requires the issuing of a special licence to hunt during the closed season. They do not use it as any "excuse" to extend the hunting season, and any suggestion that they do must be regarded as frivolous. Personnel from the Department of Agriculture make a decision on whether a licence can be granted to a landowner under Section 42 of the wildlife act; for how long and for what gender and number of deer. The hunter may be glad to help the landowner out, but unless the landowner has a legitimate problem with deer damage or foraging, no licence will be granted.

Why deer harvesting in areas with crop or forestry damage must be undertaken by "professional deer management personnel" needs to be explained. Who will pay for these professionals? The farmer who is suffering the financial losses? I wonder which would be more financially viable for the farmer - let the deer eat his silage or pay a professional hunter?

6.14. See point 3.5 above.

6.15. See point 6.4 above.

The question of who is to man the carcass check stations arises. The notion of commercial hunting licence is rather vague, and needs quantification: how many deer carcasses would a non-commercial hunter be allowed to sell? Who is going to count the numbers of carcasses sold?

I will reiterate that the focus of policing must be on the game dealers, through which deer carcasses are sold.

7.0. The introductory sentence to this section needs to be examined carefully. Who would the deer densities be reported to? I think the word "relative" should be added to the phrase "population densities". Deer management resources should be allocated appropriately to each area. We can not ignore areas in favour of others considered more deserving or in need.

What is the "game sector?" Are deer not game?

What does the phrase "hunting values" mean?

7.1 and 7.2. I strongly agree with these statements, especially point D, which I have advocated for a long time. However, point E requires explanation.

7.3. The first seven points under this section are positive logical steps to take. Boundaries between DMUs will be difficult to draw in some places (if based on river

catchments, hilltop ridges would seem a logical boundary, except that deer regularly crisscross them).

7.3.7. “ensure that cull targets are achieved...” how will this be done? How much time would a DM have to do this, considering it would apparently be a voluntary position. What will happen if a DM can not attain the required harvest levels?

7.3.8. How many DMs are necessary? At what scale of landscape would they be operating: how much land would they be in charge of? Are there sufficient personnel with the requisite knowledge of deer within the ranks of the mentioned departments?

7.3.9. How many man-hours would be available/necessary for DMs to carry out density assessments?

7.3.10. I suggest that the appropriate cull levels will be very high until such time as the deer herd is reduced to more appropriate numbers.

7.3.11. Considering, as stated above in 7.3.10, the harvest levels must be very high, I consider the strategy of using tags to control the movement of deer carcasses and sale of venison useful in theory and potentially in practice, but only in the long term, and I believe should be implemented only after a successful reduction in the Irish deer herd is attained. While the illegal harvesting of deer is a scourge - and a national embarrassment, in my own opinion - the legal hunting of increasing numbers must be actively encouraged, and having a set number of tags per hunter will have the opposite effect.

The use of tags is, apart from an encumbrance, counterproductive in terms of getting the hunters to harvest increased numbers of deer. Apart from the fact that few hunters will wish to purchase the tags for males (since the vast majority already have what trophies they want and most male deer are not of trophy quality) this will make them unlikely to hunt male deer, even though there are two months of the season when only males may be taken, and some good would be done in terms of reducing grazing pressure on farms and browsing on trees were some stags to be harvested, notwithstanding the need to harvest higher numbers of females.

Additionally, the tag system means that more affluent hunters will be able to shoot stags and more deer in general than others. Conversely, the use of tags will discourage hunters from harvesting the maximum number of deer possible, something that must be strongly encouraged. If hunters are running out of tags, they may purchase more, but if they are approaching the end of the season they might decide that it is not worth buying more, but instead, shoot only small numbers of deer each day and keep their tags for later. If they have just one tag left, they will likely keep it so that they have a tag for the last day they plan to hunt, and possibly won't use that tag after all, if they do not have a chance to shoot anything on the last day. This raises the question as to whether tags left over will be permitted to be used in the following season.

I believe that when the deer population has been reduced and is successfully controlled, this may not be a problem, but until that situation is achieved, it is extremely counterproductive.

7.3.13. I reiterate that all taxes should be paid directly to the state upon sale of venison, through the game dealers, to be reclaimed by hunters with their yearly tax returns.

7.3.14, and 7.3.15. Great steps forward in terms of deer management.

7.3.16. This seems potentially positive, with some caveats... Are game dealers to be bypassed in the purchase and sales of venison? Will enough deer be sold to make mobile deer larders necessary or useful? (I advocate their use on occasions such as an intensive deer harvest to sharply reduce populations in a DMU, as described in my previous submission to the IADPG.)

The use of tags should be postponed for a period of 5-7 years until deer populations are much reduced, as explained above in point 7.3.11.

7.3.17. Much more detail needs to be given as to how a new DMU would work. Who would decide which club is given hunting rights in each DMU?

The suggestion that hunters would be responsible for anti-poaching measures is rather naive, in my opinion. Hunters have called An Gardaí Síochána to deal with alleged poachers encountered with numerous deer carcasses at first light, to no avail. Coillte, Teo. has been very ineffective in preventing, not to say powerless to prevent, unauthorised access on their lands: those intent on breaking the law must be combated by the relevant authorities, not by hunters.

7.3.18. Why not use hunters as Deer Managers? Who will these competent and qualified persons be who will deliver the training courses? Who will deem them competent and qualified? (See point 5.4)

7.3.20. I suggest that legislative changes will be necessary for the system to work successfully. Landowners will vary in their wants and response to deer presence. Requiring all landowners to have a deer management plan, or to join a deer management group and subscribing to the management plan of the DMU, will be the only means to ensure there is consistent management across each management unit. Likewise, hunters will have to be convinced that in order to hunt they must also manage the deer. The only population management for sporting purposes will be that also required for prevention of economic damage and environmental degradation.

Appendix: Red deer. The total number of 10km squares in the country should be given so that the reader has a clearer idea of the species' extension.

Explanatory Notes 1. I believe that Carden et al., 2010 is a good starting point for current deer distribution estimates. I suggest that deer hunters would be the best source of information, as they are more skilled than others and their information therefore more reliable.

Explanatory note 2. Where does the estimated average off-take figure of 8-10% come from?

In what way have DHL returns remained consistent over the last 15 years? I would contend that if they have remained static, the population would appear not to be increasing. Is the rate of increase in the population - the rate at which the returns increase - remaining constant, rather? My experience of the returns would indicate this latter scenario.

Sika deer challenges. If culling regimes aimed at reducing population sizes are falling short of requirements, then the culling regimes have not really been aimed correctly. The high reproductive capacity of sika deer, giving it a potential rate of increase of 28% (O'Brien et al, 2007) requires a harvest of at least three times the current off-take just to remain static. I believe that culling regimes have not been applied across sufficient spatial scales to avoid inflow from other lands where harvesting is insufficient. To truly reduce the sika deer population densities to levels that are consistent with good long-term land management will require harvesting regimes of 50% for 3-5 or more consecutive years across their entire range.

Muntjac. If changes to the deer hunting licence system create more revenue for the hire of professional deer hunters (point 7.3.19), it is my considered opinion that most benefit will be gained in the long term by having them concentrate their efforts on the removal of muntjac. Although these deer are notoriously difficult to eradicate, while they are still only present in small numbers it may be possible to eliminate them. A previous introduction of roe deer was unsuccessful because of high hunting pressure. Constant, year-round pressure on areas identified as harbouring these animals may stamp them out before they get a good foothold on the island.

In conclusion, the draft policy is a long-awaited step in the right direction. Some elimination of repetition and further explanation in some parts will be useful. Immediate and drastic population reduction of overall numbers of deer, especially sika, should be the primary concern, and should guide the policy and introduction of changes to current procedures. The education of the general public and of those hunters who are not yet well versed in management objectives should be a priority. Well-prepared hunters can be utilized more efficiently and any professional hunters that might be financially supported should concentrate on elimination of illegally introduced deer.

I hope the above comments have not been overly extensive and will be useful to the IADPG. I can be contacted with any further questions or inquires. I wait to hear of further development in the implementation of the deer management policy.

With kind regards

David O'Brien, BSc, PhD, MEd.

Reference cited:

O'BRIEN, D. J., ROONEY, S. M. and HAYDEN, T. J. (2007) Reproduction and potential rate of increase of the Sika deer herd in Co. Wicklow Region. *Irish Forestry* **64**: 32-43.