

Green Belt Submission to Deer Management Policy Vision

12th of October 2012

Comments and observations on current draft document.

In the executive summary it is stated that **“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”**.

The loss referred to is often assumed to be a loss in future timber value.

However to refer specifically to the forestry sector it should be noted that these losses are of course experienced by the woodland owner but also by the contracting company who is trying (in good faith) to establish the forest on their behalf.

Establishment companies carry the cost of constant beating up and spraying of trees damaged by an uncontrolled deer population and also carry the significant cost of delayed 2nd phase grant payments.

Forest owners also carry the cost of delayed premium payments if 2nd phase grants are not paid by year 7 plus the loss of future revenue and value where their crops are damaged or indeed destroyed.

There was and still is a serious clash of national policies i.e. the FS afforestation policy plus its inbuilt policy to increase the % of broadleaves planted nationally conflicts dramatically with the incoherent policy re; deer populations and the need to design plantations that can stand up to the inevitable presence of deer.

If policy is to increase forest cover then the tools to do so should be available to the sector charged with implementing this policy.

We in GB feel that a lack of a coherent deer policy is a real block to achieving viable planting programs and to maintaining species diversity.

I note the comment in 4.4.4 that forest practice and design has a major influence on deer populations and that foresters need to consider deer whilst designing species mixes and whilst laying out plantation designs.

This comment has a future impact but I feel takes little cognisance of the management requirements of the existing forest estate.

If we are to maintain real diversity in our plantations we need to push control measures beyond improved design.

We also have to be cognisant of managing existing plantations.

The only real progress we can make in relation to managing existing problems and to maintaining a diverse forest estate into the future is to put measures in place that provide assistance to current and future woodland owners.

GB suggests that;

1. The reconstitution grant for deer damage is reopened.
2. That deer fencing grants DRF be re-introduced as a legitimate method of protecting the existing estate from continued damage.
3. That serious steps be taken to prevent the current terrorisation and fragmentation of the current deer population by poachers.

This of course costs money and any funds directed towards the measures outlined above eat's into the existing afforestation budget creating another conflict of policy.

GB suggests that it is appropriate to look at the current Rural Development Proposals as outlined in the current Commission text.

We suggest that particular attention be paid to the Forestry Proposals which are summarised as follows;

- **Afforestation premium for maintenance only for 10 years + establishment costs.**
- **Agro forestry premium for maintenance for 3 years + establishment costs.**
- **Prevention and restoration of damage to forests.**
- **Forest environment measure.**
- **Investment in new forestry technology and processing and marketing of forest production**

Whilst the current proposals do not facilitate a viable afforestation program this is not to say that certain elements of our forest strategy cannot be co-funded by Europe.

GB suggest that under point 3 “PREVENTION AND RESTORATION OF DAMAGE” that serious consideration be given to seeking funding under this heading to facilitate a coherent deer management policy for future plantations and for the protection of the existing estate.

This would imply that our afforestation program may be exchequer funded following state aid approval but that certain relevant elements of our forest policy are co-funded (taking cognisance of the Minister’s commitment to fund this program) via the RDP thus giving all concerned meaningful funds to make a difference.