

From: Cliona O'Brien [mailto:cobrien@heritagecouncil.ie]
Sent: 15 October 2012 13:26
To: Carr, Philip; dmpolicy@agriculture.gov.ie
Cc: Michael Starrett
Subject: RE: Deer Management Policy Vision (2nd Draft)

Philip,

Apologies that the Heritage Council's comments on the Deer Management Policy Vision are a day late- I was out of the office unexpectedly on Friday and so was unable to submit them before the deadline. However, I hope that they may still be considered by the Group, particularly as we have kept them brief.

Consideration of scientific and applied research in the development of the Policy:

There are several references throughout the document to the Policy supporting the undertaking of applied research

e.g. in 7.2A "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"

However it is unclear how the proposed Deer Management Unit or the Organisational Structures will actually *consider or use* the best available scientific information in decisionmaking/future updating/amendments to the Policy. For instance, there could be regular reviews of available scientific information by the DMU, or invitations to scientists to submit information to the DMU for its consideration or a forum of some sort for communication between the DMU or broader organisational structure and relevant scientists, with recommendations then being made on desired revisions to the relevant policies.

The Heritage Council would recommend that this be clarified and articulated specifically in the relevant sections of the policy, for instance under Section 2.3 on the Deer Management Unit, 3.7, 4.2 and in Section 6 on Policy, Regulatory and Administrative Issues, and in Section 7.2 A, and in the Executive Summary. This addition would strengthen the effectiveness of the policy and the robustness of any future amendments.

Council would also recommend that the Objective also reflect this, for example through the following addition "and is based on the best available scientific information". We would also recommend that the second bullet point under Deer Policy Vision be amended in this vein

"Any deer management policy must facilitate, support and be informed by scientific information and applied research where wild deer are concerned, as a basis for further policy development and review."

Invasives:

With regard to the references to invasive species, we would recommend that the relevant legislation be named as well as the All-Ireland Invasives Species Strategy which is being developed by NPWS and NIEA, if that is still progressing.

Stakeholders:

The Heritage Council would also wish to be considered as a stakeholder under Section 8, given our statutory role in the provision of advice to the Minister on natural heritage issues. We have also funded several pieces of relevant work by other parties, including research on the genetics of deer populations and the Wicklow Deer Management Group. The latter should also be referenced in the document as a type of pilot that could be considered in other areas.

Research:

The Heritage Council would also recommend that forest ecology courses be specifically named in the sections on training, for instance in the executive summary where other types are named.

Again apologies that this is a day late, but I hope it is still of use.

Best wishes

Cliona