



# **ICMSA SUBMISSION**

**To The  
Department of Agriculture, Food  
and Marine**

**On The Inter-Agency Deer Policy  
Group**

**Draft Discussion Document.**

16 October, 2012.

The sustainable management of the Irish deer population is an important issue for ICMSA and for farmers whose farming practices are affected by deer on a daily basis in many cases. ICMSA welcomes the publication of the Draft Deer Management Policy Vision and believes that rapid progress is required to adequately address the concerns of landowners. The overall thrust of the document is positive from the farming prospective however there are a number of weaknesses and issues which need to be addressed. In this Submission, ICMSA sets out its views on the Draft Vision.

### **1. Deer Management Unit:**

ICMSA supports the establishment of the Deer Management Unit with responsibility for policy implementation, monitoring and reporting in the field. It is essential that there is a clear line of responsibility for the implementation of decisions to be taken within agreed timeframes. ICMSA agrees with the proposal that the Deer Management Unit if established should be hosted by the Department of Agriculture, Food and The Marine. However it is important to stress that the Unit should be fully resourced from the existing staff and skill sets within the Department and NPWS.

### **2. Assessment of Sustainable Deer Numbers**

In relation to Point 1.6, ICMSA accepts the need for a clear assessment of deer numbers in Ireland and at local level and there is also a need to determine a sustainable level that avoids damage to agricultural practices. In relation to 1.7, ICMSA is very concerned regarding the 3-5 year timeframe and farmers simply cannot wait any longer for the issue to be addressed. It is essential that actions are taken immediately in areas where the deer population has grown to unsustainable levels and having a severe impact on farming practices.

### **3. Animal Health:**

The section dealing with animal health or more particularly bovine health is quite limited and is set out in paragraph 4.4.5. There seems to be some misunderstanding or lack of appreciation by apparently concluding that there is no problem at present. With regard to the level of TB in wild deer populations, there is considerable international experience and scientific documentation that high levels of TB infection occur in wild deer populations. The current relatively very high level of bovine TB in Wicklow is due to a large degree to the high population of wild deer. Wildlife is a particular problem in Wicklow, with large numbers of wild deer thought to be carrying significant levels of TB infection in addition to disease in the badger population. Wicklow has the highest level of afforestation in Ireland. Therefore, animal disease should be one of the central points in any deer management policy. This is necessary both from a farm animal health perspective and economic considerations as well as the welfare of the deer population themselves.

Thus, continuous monitoring of the disease by veterinary inspection of carcasses particularly in black spot areas would not alone be desirable but is essential. In Britain, it is fully accepted that farmed and wild deer can spread TB between them each other and to bovines. TB in deer, whether wild, farmed or park deer, is a notifiable disease which must be reported in the UK. Similar provision should be considered in Ireland.

Surveillance for disease should of course not be limited to TB and should include other diseases particularly those that are importance to public and animal health.

**4. Crop Protection:**

The proposition contained paragraph 4.4.5 regarding the involvement of landowners with regard to crop protection measures is a welcomed development but clarity is required on how the objective of crop protection will be achieved.

**5. Invasive Species:**

The proposal in paragraph 4.6 regarding invasive species is to be welcomed. However, in any review of the legislation, this particular matter should be examined in detail both in terms of preventive measures and increased criminal sanction against persons who import or release of non-native invasive species and not just deer species.

**6. Shooting Rights:**

Would regard to landowners and shooting rights, while this may not be a general problem but in the areas where it does occur, it can of course delay or prevent actions that is required. This is an area of law that should also be reviewed as well as seeking to identify equitable solutions by way of negotiation and binding agreements. ICMSA would enter a caveat however, that this is a matter confined to existing shooting rights and should not lead to the statutory creation of any new shooting rights over private lands.

**7. Economic Issues:**

Section three which deals with economic factors relating to deer management, is well balanced and properly focused and this is distinctly set out to in paragraph 3.2 where it is stated that the corner stone of any deer management policy shall be the minimisation of economic losses as a consequence of wild deer populations. However, ICMSA repeats its view that the economic losses on farms due to wild deer are occurring on a daily basis and immediate action is required to address these losses.

**8. Research:**

ICMSA welcomes the call for more applied scientific research in respect of deer management to include not just disease but other factors. While a considerable body of relevant research is available internationally particularly from Scotland, however focused Irish applied scientific research is essential for a properly designed and implemented deer management systems both in the medium and longer term.

In conclusion, the publication of the Policy Vision is a welcome development and must be followed immediately by specific actions at local level to address the valid concerns of landowners in relation to the growing deer population.