

## **Response to Second Draft of Deer Management Policy Vision:**

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Having read the Draft Deer Management Policy Vision, I have been impressed by how the InterAgency Group have incorporated the views of many stakeholders into the emerging policy position.

The plans are overly ambitious, but nonetheless very welcome. The secret will be to prioritise the various stands of policy within the document and get movement on at least some of these issues as soon as possible.

I am in broad agreement with the general thrust of the document, however there are a few areas in the report that I feel require changes before the final DMPV is published.

### **Section 1.6**

*The discussion document states that 'An assessment of deer population distribution and densities must be carried out....' Many of the submissions make similar claims but this is not essential. As I mentioned in my previous submission to the first draft of this document it is not the number of deer in a specific habitat that that is important but rather the impact that those deer have on that habitat. It is easier and more reliable to train land managers and possibly some hunters to quantify deer damage rather than count deer. One doesn't need to decide how many deer need to be culled in an area, it is sufficient just to know whether or not the existing cull level needs to be increased or not. Deer density changes greatly over small areas depending on factors such as species, habitat type, disturbance, hunting pressure and time of year. Preoccupation with trying to establish densities would be a massive waste of scarce resources. Adequate population modelling should be possible with retrospective analysis of properly collected deer cull data.*

### **Section 2.9**

*I feel this section is waffle and has no place in the final document.*

### **Section 5.1**

*I understand the reasoning behind this section, in that allowances need to be made for deer control in certain situations. Granted certain techniques such as night or closed season killing of deer has no place in 'primarily recreational hunting', however I do feel that differentiation of licenced hunters into any particular grouping at this stage of the DMPV will be counterproductive. Many 'recreational deer hunters' kill large numbers of deer in support of 'land management objectives' – while others may be quite ineffective in this role. Many of the nominally professional land managers such as forestry or wildlife service personnel, may well cull deer as part of their job but it may just involve a small number of animals over a short period of the year. Some*

*commercial client stalking operations may have different requirements on deer population levels than the landowners on whose ground the deer are to be found. It is therefore impossible and divisive to differentiate between the various groupings. Remember some hunters may fall into all three categories depending on when or where they are killing deer.*

## **Section 5.2**

*The term 'recreational stalker' was adopted by Coillte about 7-8 years ago to differentiate deer hunting leaseholders from their own permanent and contract staff. Such a term has no place in the Deer Management Policy Vision, unless it is at very least properly defined. In my understanding 'recreational' refers to an activity done for enjoyment when not working, but in no way implies that the activity may not be performed in a professional manner. Many such recreational stalkers kill far more deer than so called professionals, whose broad remit of work encompasses only a small proportion of duties relating to deer management. With a very few notable exceptions there are almost no professional deer managers in the Republic of Ireland. At this stage in the development of a National Deer Management Strategy, I feel that differentiating between different groups involved in controlling deer numbers could be potentially divisive and that the wording in sections 5.1 and 5.2 be adjusted accordingly. I would guess that at present 95% of the national deer cull is taken by 'recreational hunters' and this important group should not be alienated.*

## **Section 6.4**

*I see no benefit in complicating the situation by having different licencing streams. What is a 'commercial hunter'? How can a National Deer Management Unit decide whether a deer has been killed recreationally or for reward? Recreationally killed deer are sold through GHEs but rarely would this be a commercial venture. The costs involved in killing, storing and transporting such carcasses in most cases far exceed the carcass value obtained for the venison. Should there be an extra licencing charge for those hunters selling large numbers of deer then they will sell their carcasses under the recreational stream. The DAFM and NPWS presently have enough controls in place to 'create a barrier to trade in illegally hunted meats' should the will to do so be there. The purpose of this Deer Management Policy Vision should be to educate and involve the hunting community in deer management practices and the two tier language and licences mentioned in the text do not help. If there should be a requirement to raise revenue from those selling carcasses it would be easier and more equitable to impose a small levy on each carcass passing through a GHE or because of wide variation of carcass weights due to sex, age and species of deer it may be more appropriate to make this a small percentage of carcass value.*

## **Section 6.8**

*Some provision should be made for the obtaining of cull data from out of state or 'tourist' hunters, the requirement for submitting the suggested data on deer culled should rest with the sponsoring stalker, be that person commercial or otherwise.*

## **Section 7.1**

*It is essential that any National Deer Management Unit should have its own budget, independent chairman and a small representative board of various stakeholder interests.*

### **Section 7.3.11**

*I feel that the Inter Agency Group have not thought this process through. A universal carcase tag should be appropriate to satisfy the requirements of both agencies (NPWS and DAFM). However DAFM food traceability requirements will assume that the tag is referenced to a named hunter whereas it is suggested here that 'tags will only be issued to the level of the cull planned for any given DMU'. The suggestion that an appropriate cull level can be set for any regional DMU is at present absurd. There is no data available on which to base such a cull, there is no control on illegal hunting and there are no suitably qualified personnel to set such a cull level. Things may eventually change as this process develops but initially it is essential that all hunters have an unlimited number of tags, all carcasses (whether for sale of home consumption) must be tagged as soon as killed, and all records required for NPWS or DAFM should make use of that carcase number. Restricting tags to a particular DMU will mean that some hunters will be unable to kill deer for reasons of crop protection should they not have a suitable tag available at the time, and would provide a 'reasonable excuse' for being in possession of and untagged deer carcase. Many hunters will obviously legitimately hunt deer in many different areas, and therefore DMUs, and collecting a range of tags for each of these areas will create huge administrative burden on both the hunter and overseeing authority.*

### **Section 7.3.12**

*The suggestion that there should be different charges for both 'trophy' tags and hind tags is ridiculous. What is a trophy deer, and who would police this regulation? All genuine trophy deer would have their heads removed before submission to a GHE, so would not be available for assessment anyway. As stated elsewhere in this document the priority in this process is to collect accurate biometric data. There should be no regulation that would encourage hunters to wrongly declare the age or sex of culled deer. Policy makers must also understand that there are large numbers of non wild deer that are processed in GHEs, deer shot on deer farms and parks that are reared in non intensive conditions can be quite legally traded in such plants and such carcasses would be exempt from any tags issued to fund a wild deer management unit.*

### **Section 7.3.13**

*I have mentioned earlier the problems associated with defining a 'commercial hunter'. I can see how the average hunter may want the bigger operators to pay for this new deer management strategy, but we must remember it is those people killing the larger numbers of deer that are actually those managing Ireland's deer, and should not be unfairly penalised for doing so.*

### **Section 7.3.16**

*I presume that this section has a typographical error and should read 'Venison carcasses would not be sold or exchanged without valid tags and background checks'.*

### **Section 7.3.17**

*Dream on. In an ideal world this may make sense but unfortunately this section shows little understanding of the psyche of Irish deer hunters and the deer hunting organisations. Only a small number of licenced deer hunters are represented by any such organisation. Inclusion of this section in the Deer Management Policy Vision would actually be divisive as the various groups and personalities competed to become the 'suitable national body'. Anyone with any knowledge of successful deer management groups in the UK, knows that they can only succeed if grown organically from the bottom up, involving local hunters and landowners. No national body can impose a system of local deer management.*

I did make the point in my last submission but having read through this document, I was surprised to see that there was no mention of the easiest, quickest and most cost effective method of regulating deer populations, the manipulation of hunting seasons. We have moved within a couple of years from increasing to decreasing deer populations in many areas, but the pendulum could quickly swing the other way. Deer population growth can be curtailed by increasing the length of the female open season. Females are more easily killed in March and April than at anytime in their present open season. With shorter nights, fresh spring grass, and increased nutritional requirements in later pregnancy, they are more visible and easier to cull. This is also the period of increased conflict with the agricultural sector. It would be preferential to increase the female open season at this time of year rather than the ready issuing of widespread Section 42 licences during the summer months.

Seasons could vary between species and area. In Kerry for example the red hind season could be further shortened if numbers were decreasing, but increased again the following year if the situation changed. Increased open season lengths could be applied regionally to halt the spread of a species in areas where they have been recently introduced, for example sika deer in Galway. We must realise that deer management requirements vary regionally and legislation must be able to adapt quickly to management objectives and variation of the open seasons orders is probably the quickest way to manipulate local, regional and national deer population densities.

Jim Walsh 8<sup>th</sup> October 2012