

SUBMISSION OBSERVATIONS FROM THE DRAFT DEER MANAGEMENT POLICY VISION version 2 . October 10th 2012

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INTRODUCTION

My Understanding is that we have been invited to submit our observations of Draft version 2 as presented ,arising out of which a more final ,workable proposal will be due mid November.

At the outset , it is commendable to see such a report as the Deer Management Policy Vision ,version 2 , presented in such a professional manner ,and endorsed by a Government Minister ,that has achieved so much positive and fruitful debate in such a short time . It does not really matter that the Minister's commitment is driven by one sector pressure from the IFA ,so long the process gets under way .

There is much good essence in this vision document to allow the formation of a workable forward thinking solution that will hopefully evolve and develop over time ,from which we can all learn and achieve a lot .However ,it is imperative that the problem of local over population/damage is addressed as soon as possible to address and appease the current negativity , while the National Policy Plan can take a more considered positive approach. At the local level,the template is already in place ,and every area has a Wild Life Ranger or Coillte representative that could initiate and coordinate a programme .So it is possible to act now .

I think that it recognises the problems and challenges associated with Deer in the current environment,and the need for a management structure that benefits all stakeholders ,including most of all a sustainable and healthy Deer population that everyone can value and appreciate in a positive mode ,and also the need for awareness , education and action .

It is clear that success will only come from a collaborative buy in by ALL stakeholders with identification of common ground, even if some maybe reluctant to commit at the start ,but will come on board at a later stage .

It is also clear and evident that the two MAIN stakeholders that will effect real positive change,the Landowners and the Hunters , are the two most lacking leadership ,direction ,clarity and

understanding of the challenges and benefits . And this is where the greatest focus and effort will deliver the most positive results.

However ,I feel it is really important that we need to avoid creating a mammoth costly structure /process bureaucracy, and introducing yet more legislation (that we Irish seem to thrive upon)to address a more simple challenge with a workable solution ,when we have most of the basic frameworks in place to deliver .Lets learn from the UK ,who have worked up best practice in effective Deer Management ,as much as is possible . Lets not make a reasonable requirement into a more complex, technical and unmanageable process .

That is what worries me somewhat about this document. The aims and objectives are so broad in range, cumbersome ,and aspirational (mainly lifted from a range of established sources) ,that am not sure what could be achieved ,as compared to more focused ,layered objectives and strategy ,worked out in stages ,that could have a chance of delivery . IE develop the initiative in stages,keep it structured and deliver visible action .

One must remember the origins of this journey ,which was spawned out of the “hysterical ” research studies shouting about the excessive numbers of Deer ,Populations out of control etc etc ,which in fact were totally unfounded ,over exaggerated and lacked fact. It would be estimated that over ¾ of Deer populated areas would not have a Deer problem, probably managed by over shooting default .

In my view , while this document is to be applauded ,it does contain many negative ,unworkable ,unnecessary potentials and assumptions ,probably due to some of its authors ,who would be academically qualified professionals , but lacking factual knowledge and workable experience of what is actually happening on the ground .

Also it is interesting that this document was claimed to be based on the details and proposals arising out of the submissions supplied from version 1. However, having read all of the submissions , there are many additional points in version 2 that were never mentioned ,so obviously other bodies had input also .

Included in the document is reference to an All Ireland approach. How could this be feasible and workable as the North is a separate jurisdiction with differing legal framework etc .There undoubtably are synergies to be leveraged but lets not get sidetracked into solving too big a task at the early stages . Concentrate on what we can effect most.

It is a fact that the document and ensuing momentum highlights the ineffectiveness of the incumbent “Deer Societies ” who have achieved so very little across the last 30 years ,mainly because they have little focused direction and strategic aims ,resulting in a lack of representation of scale of the Hunting community . (representing only about 15% of the active Deer Hunting fraternity after all this time). I would hope that in the interests of the Hunter that a representative Body does emerge . Otherwise the recreational Hunter is at serious risk.

There is much talk in the Policy Vision about the acute need for research and academic approach. Truly, there is a wealth of study available from the UK, where similar problems /challenges exist and much money invested in such studies...so why do we need to reinvent it all at the early stages ?

In terms of funding, finance for this project etc, one would need to be acutely aware and wary of Ministers who promise funding for non essential projects in these austere times. In reality, what he means is that it will be funded by the Hunter ONLY, who is already hard pressed and perceivedly getting less for the money he is now investing. So be cautious of penalising one of the key stakeholders further and expecting them to carry the burden. There are several mentions of increased commercial revenue potential from Recreational Deer hunting. This needs to be explained further and justified. I think there is serious confusion in the mindset between Commercial Tourist interests and the "Recreational" Hunter and what is possible and best to achieve the task in hand.

However, arising out of it all, it is clear that the project needs to be worked up and delivered through three stagesshort, medium and longterm workable strategies, and a potential framework is loosely identified in the Vision Policy document, which obviously will form the basis of a more formal proposal.

Most importantly, any structured programme for a National Deer management Plan will provide a structure in which Deer in Ireland can thrive and prosper, in accordance with sustainable limits, for the future, and no longer treated as vermin by many.

I have some observational issues that I will highlight in broad headlines for clarity. I offer no final solution, but am willing to play a role in any final framework programme going forward.

FARMERS AND OTHER LANDED STAKEHOLDERS

There is no question that Landowners who are experiencing commercial damage and resulting loss from Deer are well within their rights to seek a solution. The fact that as a group of people, we have never really offered a viable solution to their problem only highlights their growing frustration.

And we need to offer a solution quickly...and it is possible.

We have all listened at meetings across the years to growing hysteria from IFA and other Farming representatives about grass damage, loss of income, tree damage, disease spread, broken fences etc, that are real issues and concerns, all caused by increasing numbers of unchallenged Deer, and have really never offered a solution, other than playing lip service.

In general, everyone has looked to someone else to shoulder the blame, and to provide the solution.

In reality, the onus lies heavily on the landowner. They are the people that own the land, own the Deer, and manage access, and control sporting activities, and possibly have the least understanding

of what is required . In general most farmers complain about the Deer ,but actually have no management plan structure with absolutely no accountability from the people who “shoot”Deer, and allow a free for all shooting policy (friends ,neighbours ,relations) that in fact because of small holdings and excessive disturbance actually enhances the Deer problem ,making them more secretive ,nocturnal and harder to shoot .

This is mainly due to ignorance of alternatives and best practice, lack of general awareness and lack of direction from governing bodies , and generally a very ignorant or misguided hunter.

Other large land owners such as Coillte ,NPWS etc tend to either manage Deer by best price ,rather than best practice (letting a greedy market dictate price) or exclusive single agenda strategies . What is needed are inclusive and collaborative strategies that work across all levels/areas to ensure there is gain for all .

Issues will become even more important and evident as potential new owners of Coillte timber harvest may not be so tolerant of loss of revenue through Deer damage.

Hence it is vital that there is some short term progress.

Poor forest planning, creating unworkable Culling areas and non favourable habitat need to be addressed also ,once and for all . Despite all best practice forest structures ,planters still insist on planting the full acreage .

Limitations on access by Hunters ,growing number of isolated housing and increased forest use by a range of public pursuits through the open forest policy all ensure that Deer culling is not an easy task in the modern environment.

Exclusive strategies across stakeholders do not work . The challenge is to bring them together .

A similar question surrounds the requesting/issuing of section 42s. How many of these are genuine ,requested by genuine Farmers with a real problem and understanding of whats required to solve the problem ?

Hence the recommendation of working from the local area up,with DMU s is a positive approach .

Local knowledge and contact is important to ensure local support.

What is needed in the short term to satisfy the commercially out of pocket landowners in areas where Deer numbers need to be reduced (quickly) is a short cull strategy of identified hot spots ,that is managed by a local coordinator in collaboration with landowners and Stalkers . It takes time and understanding for farmers to see the benefits and change attitude,but the results will be positive ,and word can spread if the organisations are behind it. This strategy is evident in the test area in Wicklow , Ballinastoe Deer Management Area (of which I am involved) ,to which Minister Deenihan recently visited and was impressed ,that could be rolled out immediately across any area in the country .It only takes coordination and commitment ,and very little finance.

THE DEER

There is too much emphasis and focus on invasive species . All the over reaction of Muntjac several years ago ,(12 month seasons) has resulted in only a couple being recorded as shot and several ongoing sightings ,mostly dubious . The nature of land use ,especially in Wicklow would have identified a growing population before now .

Besides ,legislation is already in place to penalise those who import and release .

Where are our native deer anyway? Sika , Red Deer ? Hybridisation is a fact of life in Ireland ,not an issue now ,and cannot be addressed anyway.

So lets focus on the things we can effect right now . And that is managing the National Deer herd we have.

The one sure outcome of all this is to ensure that our largest mammal receives protection and recognition and can flourish in a managed and sustained environment to be enjoyed and appreciated by all .

Deer counting to assess the population as proposed is an aspiration ,long term and not short term feasible , and should not be a starting pillar .

That does not mean a National Deer Population assessment should not be worked towards. However ,there are many ways to assess numbers through ,cull returns ,Local area knowledge ,local counts,returns ,tags ,Game dealers etc etc that would give enough information to assess a potential cull. Plans can change quickly in accordance with activity on the ground .

Suggestions of biological controls such as immune contraception are not best practice anywhere in the world and would invoke a large negative reaction . This type of thinking again demonstrates academic thinking over practical reality.

The public in general have little interest or concern with Deer management and culling. Possibly because we are still a rural society at our roots ,and understand certain things need to happen .This is obvious for example with the Irish Wildlife Trust who have a major issue with Badger culling ,but at the meeting in Celbridge it would appear that they endorse a management plan(including culling of Deer). It is also evident from members of the public one encounters while out hunting .

So lets not stimulate and create unnecessary debate or public conflict at this stage via any proposed public awareness campaign until we have achieved something positive and structured,and beneficial results are available both commercially and for the Deer .

Venison is a valuable meat source,and I would agree with the sentiments proposed in the report .

However ,to make it table acceptable and create mass demand ,requires a proper marketing approach to change perception and create public demand. This is best worked through various Government Food Agencies such as Bord Bia who have extensive marketing skills and resources.

The issue of disease and Deer as a carrier has been around a long time , yet percentages of infected animals are so low (around 1%) in both the UK and Ireland ,that this is really a red herring and not an issue . However ,as with other things it is a perceived issue with IFA so reality needs to prevail through education and awareness . The Farm and Vet Organisations should play a key role in assisting and addressing this area of concern ...thats what they do for a living .

Again ,do not create a mountain out of a molehill .

ROAD TRAFFIC ACCIDENTS

RTAs are mentioned also. Road traffic accidents involving Deer have always been a problem in rural areas ,with a vast network of roads .Modern highways ,that allow fast speeds can have serious accident potentials for Deer related accidents . Things such as fencing ,correct planting programmes on roadsides ,especially in identified hot spots ,coupled with impactful Motorist signage at key times of year can help to reduce accidents .

More Deer management in certain areas will reduce numbers accordingly hence reducing risk .

The Key to reducing RTAs involving Deer is Driver education and awareness of deer related problems and Activity timings such as the rut , established crossing points on roads is required in the form of a marketing campaign.

The NRA invest millions on marketing all areas of road safety involving speed ,mobile phone use ,worn tyres ,wet roads etc etc ...why not one covering Deer . Maybe sponsored by Insurance companies who suffer financial loss or the AA who champion the motorist ...if the issue of RTA s involving Deer is such a major problem .

HUNTING SEASONS

Changing and adjusting Deer hunting seasons could be suggestion ,but one needs to do it for the right reasons. It could be more productive to put structures in place to enhance accountability and commitment to ensure Hunters cull enough in the season provided...not when it suits them to get around to it ,or as season extensions. Changing at this stage just moves the problem around .

THE RECREATIONAL HUNTER

On the positive side, there is a great appetite for corrective Deer management amongst most genuine /reputable Deer hunters . What is needed is direction, structure and mandate ...the challenge is from who ?

They need to be part of a representative body that has credibility and confidence ,and scale to protect their interests.

As stated previously ,it is sad that none of the Irish Deer organisations have ever been able to offer this in any meaningful way ,being consumed by politics and shallow mindedness ,and probably in danger of being left behind in this new process .(hopefully not..maybe they can collaborate and re group).

I am not sure about what is meant by Trained Professional Deer Management Personnel .Talk of professional deer Hunters is an uneconomic and crazy concept . It has been rejected in all countries ,especially the UK ,where it was not viable ,and most practical management is done by qualified and committed recreational hunters .

Again I think this is terminology extracted verbatim from other sources without full understanding .

The whole area of potentially alienating the recreational Deer hunter is naive . Recreational Deer hunters probably account for over 90% of all deer culled in Ireland every year ,so they need to be part of the solution not the problem . And as mentioned ,expecting them to fund a programme that will definitely discommode a number of hunters is not the way forward.

At least ¼ of all Deer Hunters have done the Coillte requirement Hunters qualification of theory and shooting (HCAP). This is fully managed and endorsed by Coillte and NPWS, so to imply there is no valid recognised trained hunter course available is not true . Why do we need to recreate new forms of hunter training with both this and tried and tested UK available recognised qualifications ?

Many others (including myself) have done the UK British Deer Society DMQ level 1 and Level 2 ,which is the highest recognised qualification requirement for general and specific Deer management operations and provide acceptable ,traceable Deer carcasses for market . So why do we need to reinvent the wheel ,just because we are Irish ? Is it because of personal financial gain or power seeking opportunism? This needs to be looked at closely.

Why are we being encouraged (possibly future forced) to do yet another day course ,endorsed by the Dept of Agriculture (costing over €350) on carcass preparation (yielding a trained carcass producer) to fulfil personal and commercial agendas and power bases when Vets already inspect the carcasses?

Scottish Natural Heritage in the UK have produced a very fine manual on best practice Deer Management Guidance that costs around €20 ,and is far far superior than anything we could ,or

need ,to produce here ..so why not adopt these UK offerings to upscale /uptrain our Hunters ?Every Hunter ,Manager ,Landowner should own one and refer to it often.

Why attempt to alienate all these hunters who have already invested in qualifications and training that was deemed acceptable at one point ,but now not because the power changed ?Drastic legislation change is not the answer. There is already legislation enough to deliver all the needs...just needs the will to be enforced .

Too much will merely drive more Hunters outside the net to be lost altogether.

It is best to work with what we have and then see what needs to be modified .

More legislation introduced too soon will create a huge backlash of hunter reaction ,and put less hunters on the ground . Remember the Rod Licence war of years past .

To think that more revenue can be extracted from the recreational hunter is again ill conceived .

Best price rather than best practice is not the answer .

While I fully endorse the principal of National tagging as a form of control ,accountability and traceability (I struggle to see how it could be implemented and by whom . There is great talk of IT /Online systems etc but....!) ,I am fully against the potential tag cost for Stags... this is totally detrimental ,and an unworkable suggestion . How can this be managed ,and why ? Again ,this is an element of thought by someone on the Inter Agency Policy Group, who has little on the ground experience or knowledge .

Maybe this should be applied to Commercial tourist operators who are possibly over reaping the stag harvest ?

Tax clearance certs etc are fine...they focus the mind and ensure everyone pays their share .

The proposed €100 cost for DHL could also be a problem . Deer Hunters invest a huge amount of money pursuing their sport ,and are the same people who are experiencing austerity...remember the debacle over the €100 House Charge . What would be the justification ? To have to invest yet again in "training " ? To pay for a layer of bureaucracy ? To pay for more legislation ? To pay for some one else to come in and take their shooting ground ?..its all about credibility and selling the package .

Most genuine Deer hunters are trying to do their best to manage Deer on the ground that is becoming harder to secure ,for short periods ,especially as the Commercial Overseas Tourist Operators continue to flourish . These need High density Stag ground to conduct business, hence high density female numbers also ...so immediately there is a problem . They also have the money to invest ,because its business ,thus precluding recreational hunters away from areas .

Recreational Hunters need guidance and direction and collaboration. To be fair,this report somewhat acknowledges this fact ,but then heads off in another direction .

The legislative and complex frame work that governs Hunters is already robust and rigid ,and before more is introduced ,enforce whats there and then adjust accordingly to need .

There is no real need for more control, just more accountability which is the key to measurement and fact .

One needs to be mindful of the issue of sale of venison for financial gain and illegal and indiscriminate taking of Deer . Bear in mind that there are few illegal poachers...most are within the legal frame work and requirements..they have to be to have a firearm ,a DHL and ability to sell Deer to a Game Dealer . They are just abusing the system and the flaunting the law. The law just needs to be enforced .

Poaching is similar to Deer damage...everyone is looking for someone else to solve the problem .

While Poaching and overshooting is a serious problem in most areas ,fuelled by the ability to sell illegally stolen Deer ,many genuine hunters do need an outlet for their Deer also .

Also by default ,the above illegal activities have reduced the numbers in some areas to manageable proportions ..so the groundwork is there to build on .

I agree in broad principle with the concept of the DMU network ,as outlined in the proposal . An Independent Chairperson would be best to get buyin from the key stakeholders .However I am not sure about how it would be developed , by whom ,how it would be managed ,implemented ,but it is the way forward . As suggested earlier , Immediate local action is needed as phase 1 ,which could be coordinated by NPWS Rangers and/or Coillte representatives on the ground .

If the will is there ,the rest can follow. And that will be the task of the appointed Working Body /Steering Committee.

However the proposed potential requirement of recreational hunters to be a member of a local gun club leads me to seriously worry about over control ,and the input/role of an existing Bird shooting national Body that could have a broader agenda . Much reassurance on this approach would be required on how this would actually work and the gain involved .

I appreciate scale of numbers is important for any group of like minded people ,but not sure at this stage about the agenda ,and also how it could work and be imposed ?

The objective of all this is to put as many of the right minded people inside the camp ,create a really successful framework structure that the rest ultimately will want/ or need to be part of .

This can only be achieved with unbiased and clean agendas in the full spirit of collaboration ,and built from the core.

I am sure that the tipping point has been reached and things will happen...just need to ensure they are as inclusive as possible and object achievable .

CONCLUSION

A worthwhile document containing many positive proposals ,but also in my opinion , some extremely misguided ones also , and a general lack of understanding/experience .

Identifies weaknesses in the current process .

Lack of understanding and justification on who will form the Body/Structure that will create and coordinate ,make success happen and work with those who need to be persuaded.

Too heavy on introducing too much change too quickly .

An overt reliance on too much new legislation

Potential to alienate a large number of valuable Hunters

Lack of clarity on the funding aspect championed by the Minister.

Lack of understanding of inclusiveness

Roadmap of development should be short ,medium and longterm...all with dedicated aims ,objectives and early actionable points with implementation strategies to deliver .