

SPORTING RIGHTS OWNERS ASSOCIATION IRELAND

Lecarrow House, Spencer Harbour

Drumkeeran, Co. Leitrim

Phone: 071-9648960, Email: jojosch4@gmail.com

**Deer Management Policy Vision,
Forest Service
Department of Agriculture, Food and the Marine
Johnstown Castle Estate,
County Wexford**

Date: 12/10/2012

**Re: Submission on the Draft Deer Management Policy Vision
(Second Draft, Discussion Document) September 2012 of the
Inter-Agency Deer Policy Group**

Dear Madam,

Dear Sir,

in order to allow for a healthy sustainable deer population in a healthy thriving forest of high commercial value and high biodiversity quality and to reduce negative impacts of deer (where necessary) to an acceptable level on all non forestry land a new Deer Management Policy is very much appreciated.

But it is important to acknowledge that that deer management is not only about the control of deer by culling or shooting but is starts with proper planning of land use and taking into account the requirements and habits of deer. By doing this, negative impacts of deer populations on commercial forestry and farmland and biodiversity in forests and biodiversity of all land inhabited or occasionally utilised by deer and can be avoided.

This requires to take the needs and habits of deer into consideration in the process of any spatial land use planning. The Plans and Programs proposed in the Draft Deer Management Policy Vision will most likely be subject to a Strategic Environmental Assessment SEA a requirement which derives from the **SEA Directive (2001/42/EC)**.

SPORTING RIGHTS OWNERS ASSOCIATION IRELAND

Lecarrow House, Spencer Harbour

Drumkeeran, Co. Leitrim

Phone: 071-9648960, Email: jojosch4@gmail.com

In Deer Management a habitat approach is needed which naturally goes beyond single stakeholder interests and requires the working together of different stakeholders like landowners like farmers and forestry owners and owners of sporting rights in order to allow for a healthy deer population in a healthy thriving environment of high commercial and conservation value and high biodiversity quality.

Another prerequisite for successful deer management in the interest of deer, forestry and agriculture is the creation of sufficiently large enough deer management areas which take into account the movement of deer during the seasons of the year.

As far as forestry is concerned the integration of rides, glands and scalloped woodland edges is of utmost importance for providing "suitable habitat for a very diverse plant and animal community. Forest edges are the most biological diverse areas of forestry. This way planned and managed forests have a higher carrying capacity for deer and negative impacts on the forestry (trees) can be avoided or reduced and it helps to keep deer away from farmland. This will of course only work if there is no illegal competition by sheep tolerated in forestry.

Sufficient enough and large enough rest area, no go areas (areas dedicated for deer) have to be provided in order not to attract deer staying hidden in the forest, woodland during the day time because they can't undisturbed and safely move to the open areas or just can't utilise them safely and therefore are unable to satisfy their feeding needs hence unavoidably doing harm to the trees.

Having in mind the above a new deer management policy is definitely desirable and needed.

Furthermore we would like to take the opportunity to comment on the various parts of the Draft Deer Management Policy Vision, Draft Discussion Document, Second Draft of the Inter-Agency Deer Policy Group, September 2012.

Strategic Principles

1.0 Deer management related spatial and organisational issues

Under 1.3

Unfortunately no emphasis is put on spatial planning to increase the carrying capacity of land of an area for deer. Deer management should not only mean managing deer based on the status quo of the land but also planning future land use in a way which potentially enables the land easier to tolerate deer and hence having a higher carrying capacity for deer.

Under 1.6

It is said that an assessment of deer population, distribution and densities must be carried out as an essential prerequisite to any deer management strategy in the field.

As a first step we are proposing an assessment and mapping of damages done by deer.

Under 1.7

We would like to comment that a deer population assessment carried out over a 3-5 year timeframe is only convincing and can form the basis for certain future deer management measures if the full extent of a local deer population is exactly monitored and habitat changes and deer cull of the entire area is properly accounted for during this time frame of deer population assessment.

SPORTING RIGHTS OWNERS ASSOCIATION IRELAND

Lecarrow House, Spencer Harbour

Drumkeeran, Co. Leitrim

Phone: 071-9648960, Email: jojosch4@gmail.com

2.0 Environmental/conservation issues relating to deer

Under 2.3

We are missing the request that deer policy must support applied research regarding quantification of the positive effects of deer on biodiversity (for example positive effects by dissemination of seeds etc.)

4.0 Stakeholder Related Principles

Regarding 4.4.3

It is important to get the owners of sporting rights involved and consult with them.

It is our understanding that it happened in the past that the ownership of sporting rights was ignored when decisions were made in regard to granting out of season licences to shoot deer.

It is our understanding that it happened in the past that Deer Hunting Licences and Firearms Certificates were granted on the basis of incorrect permits of landowners to allow shooting and hunting on their land despite they do not own the sporting rights of their land.

Regarding 4.4.4

We fully agree that Forest practice and design has a major influence on deer population dynamics and behaviour and that pre-planting design of forests is a critical issue.

SPORTING RIGHTS OWNERS ASSOCIATION IRELAND

Lecarrow House, Spencer Harbour

Drumkeeran, Co. Leitrim

Phone: 071-9648960, Email: jojosch4@gmail.com

It is important to have sporting rights owners directly involved in the development of a structure for future local deer management groups.

Regarding 4.4.5

The policy should actively support the involvement of sporting rights owners in local deer management groups

Regarding 4.4.6

Overpasses are much better suitable to connect fragmented habitats and reopen migration routes helping to avoid concentration of negative impacts of deer on an area too small to cope with it. At the same time it connects localized deer population with other ones promoting genetic exchange and avoiding inbreeding.

5.0 Recreational Deer Hunting related issues

Regarding 5.1

This distinction makes no sense.

All control activities have to help to achieve the same objective, namely having a sustainable deer population which is benefiting the deer, the people and the land the deer is living on. This includes more than immediately measurable economical benefits.

SPORTING RIGHTS OWNERS ASSOCIATION IRELAND

Lecarrow House, Spencer Harbour

Drumkeeran, Co. Leitrim

Phone: 071-9648960, Email: jojosch4@gmail.com

Regarding 5.2

If properly done and conducted recreational hunting is part of professionally applied deer control and may be even the only locally applied professional deer control.

Regarding 5.6

A consistent management of deer for sporting use over longer periods allowing to manage deer by taking their life expectancy and individual development into account and hence enabling to achieve a deer population with a suitable age and sex ratio is needed. In order to achieve this long term lease arrangements (>10 years) should be mandatory when sporting rights are for tender respectively leased.

6.0 Policy, Regulatory and Administrative issues

We are missing a clear definition of commercial hunting

Regarding 6.9

The tags attached to a deer carcass should match the data electronically submitted.

Regarding 6.10

It should include practical exercises and assessment of handling of a wide variety of different rifles legally permitted to shoot deer.

SPORTING RIGHTS OWNERS ASSOCIATION IRELAND

Lecarrow House, Spencer Harbour

Drumkeeran, Co. Leitrim

Phone: 071-9648960, Email: jojosch4@gmail.com

Regarding 6.13

The control of deer involved in damage to crops or forestry should only be carried out in agreement and with permission of the owner of the sporting rights otherwise it would constitute a part dispossession or temporally dispossession.

Regarding 6.15

We don't see the sense of commercial hunting licences as long as the deer carcasses delivered to a game dealer are tagged.

7.0 Development of deer management organisational structures

Regarding 7.2 D.

This should only happen in agreement of the owners of the sporting rights and only if sporting rights owners are unable to solve the problem themselves and it has to be in mind that a certain amount of damage has to be accepted from a wild species.

Regarding 7.3.7

It has to be ensured that the cull targets are achieved by the trained hunters designated by the owners of the sporting rights.

SPORTING RIGHTS OWNERS ASSOCIATION IRELAND

Lecarrow House, Spencer Harbour

Drumkeeran, Co. Leitrim

Phone: 071-9648960, Email: jojosch4@gmail.com

Regarding 7.3.12

What happens if the cull plan is not fulfilled?

Tags should be issued on the basis of deer to be culled in a certain defined area and not to hunters. These tags dedicated for a certain area can be made available to individual hunters by the natural or legal persons legally entitled to the sporting rights of the area in accordance with their area share and deer density of the area they are entitled to.

We can't see any good management reason which would justify trophy tags with having a fee attached.

Weaker stags have to be shot as well and this would be discouraged by trophy tags with fee attached.

There should be no additional tags issued, except for good management reasons and in this case no fee should apply.

Regarding 7.3.13

It should be the right of the owners of shooting rights in a DMU to use the to them allocated tags at their own discretion irrespectively if deer shooting will or will not be operated commercially or as a tourism venture (the manager of the DMU or the NDMU administration should have no say whatsoever in this matter), as long as it is pursued in accordance with proper deer management and in accordance to an agreed cull plan for the DMU.

Allocating tags under a commercial fee structure and on condition of tax clearance certificates is totally unacceptable and in no way benefiting deer management but only a way to draw money and not encouraging hunting tourism which would benefit rural

SPORTING RIGHTS OWNERS ASSOCIATION IRELAND

Lecarrow House, Spencer Harbour

Drumkeeran, Co. Leitrim

Phone: 071-9648960, Email: jojosch4@gmail.com

communities. The way the cull plan will be achieved has in no way anything to do with the Revenue. Good deer management and taxation are separate issues.

Regarding 7.3.17

This is totally unacceptable and has to be more thoroughly thought over. The district gun club model is unsuitable and not acceptable for the owners of sporting rights.

For example gun clubs do not have all hunting areas at their disposal. Would recreational deer hunters have to be members in the respective clubs of the area where they intend to hunt? If yes this would mean they might have to be members of many clubs in many different areas, but the normal procedure with NARGC clubs is that somebody can normally only join a gun club in the area of the district he/she is living.

These are only a few of the implications which render the proposal under 7.3.17 unsuitable and not helpful for proper deer management.

Regarding 7.3.19

We are of the opinion that the scale of charges and fees proposed to administer the system is worrying. The voluntary contribution deer hunters are already making in protecting deer and the environment in general should be taken into account before talking about new fees and introducing them.

Regarding 7.3.20

Working together with sporting rights owners is needed too for the system to work.

SPORTING RIGHTS OWNERS ASSOCIATION IRELAND

Lecarrow House, Spencer Harbour

Drumkeeran, Co. Leitrim

Phone: 071-9648960, Email: jojosch4@gmail.com

8.0 Stakeholder Group

The Sporting Rights Owners Association Ireland herewith applies to be accepted to be part of the Stakeholder Group and wishes to be considered for further participation in the development of Deer Management Policy, in conjunction with the Departments concerned.

Kind regards,

Joachim Schaefer

(Deer Manager, Spokesperson of the Sporting Rights Owners Association Ireland)