



# *Wicklow Deer Society*

*Serving County Wicklow Deer Stalkers*

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10 -10-12

Forest Service,  
Department of Agriculture, Food and the Marine,  
Johnstown Castle,  
10 -10-12

To whom it may concern.

**Re: Observations on the Draft Deer Management Policy Vision second draft.**

Dear Sir,

The Wicklow Deer Society represents deer stalkers in County Wicklow. It is proactive in having a development and training program for its members. We are a participating and founder member of the Deer Alliance. It is an organization formed to represent the views of stalkers in County Wicklow.

We would make the following observations on the Deer Management Policy Vision (DMPV) second draft. These observations are indicative only and are not to be taken as conclusive.

We are moving from an almost totally unregulated situation to what could easily become an over regulated one against a backdrop of little information on national numbers or spread and cull rates. There are different competing interests, commercial, agricultural, hunting and conservation. Each of these will have to be considered in the context of their contribution to the development of a National Policy for deer. We have to recognize their concerns and develop a framework that will allow the various interests to coexist.

The present DMPV is an example of the confused approach by Government Departments. The vision has come prior to the consultation; however it is to be welcomed as a basis for further discussion.

We (stalkers) believe that the management of deer cannot be successfully carried out without the co-operation and support of the deer stalkers and where appropriate their clubs and reprehensive bodies. One has only to examine the operation of deer lettings in Coillte to see the weakness of a system based solely on monetary returns. Clubs provide much more, they are the local eyes and ears so essential in the control of poaching. They form part of the local community. Many of the land owners are themselves members. There has to be recognition of this in any future national policy.

Section 3.0 Economic Factors.... Would appear to be a framework for deer farming on a national scale. Ireland opens for business as a centre for deer exploitation ? Most of our members are closely involved with land owners in the control of deer grazing their lands. In County Wicklow the majority of the deer originate either in Coillte forestry or in the National Park. Were the Coillte forests and the National Park deer fenced in the sensitive farm areas the problem of grazing would be considerably reduced. As a Category 2 Park hunting is not permitted and for control of deer relies on staff of the NPWS.

At present deer stalkers get very little support from the state. Their rifle license fees could be used to support training for new hunters, particularly the young hunters who we will rely on in the future to cull deer (section 3.6)

We believe that if a universal tagging system were introduced it should be free to all hunters except those involved in a commercial enterprise. There should be a clear distinction made between those involved commercially and others. Commercial interests should be registered with the Revenue Commissioners for tax purposes and have commercial coded tags assigned to them. This should apply to all individuals and clubs bringing in guests for reward. The value of a stag shot as part of a commercial enterprise has got to be balanced with the need to maintain good stock and the danger of overshooting is ever present.

The key to the control of poaching is vigilance and prosecution. The DMPV is very weak in this area. Poaching has expanded and is a highly dangerous activity. It is

carried out in the main at night. There are few prosecutions. For this reason Section 42 with lamping (almost uniquely a County Wicklow experience) should not be permitted other than in exceptional circumstances and should fully conform with the wildlife acts

Poaching is popular because it pays. Game dealers are central to the rewards however unwittingly. Future policy must introduce a system of controls and a greater degree of traceability at the point of sale of the deer carcass. This may involve co-ordination of the details on a deer hunting license and the deer tag numbers. Deer recorded as shot in a particular geographical area should correspond to the areas stipulated on the hunting license application and which should be available on the new hunting license. All details of individuals selling deer to the game dealer (PPS Number?) should be recorded and be available in case of infection and for tax purposes.

Section 7.0 requires a re- think as it appears to be overly complicated and expensive organizationally. We may not require such a cumbersome structure. Perhaps the way forward is to rely on advice and a more specific role for the NPWS in this area. We are concerned with the imposition on private land owners of cull levels which are legally enforceable (Section 7.3.4)

We would be opposed to the creation of hunting clubs limited to particular DMU areas (Section 7.3.17) this should be addressed through the recognition of the existing club structures with a better system of allocation of hunting areas. Most clubs are geographically based. There may be a role here for hunting representative bodies

For this reason we are also opposed to the contents of Section 7.3 19

We are happy to have this opportunity to comment and to be consulted on a Draft Deer Management Policy Vision and wish to continue as part of the Stakeholder Group. We look forward to working together with other interested parties to developing strategies and policies to improve hunting for our members and at the same time guarantee that deer continue into the future so all can enjoy them.

Best regards,

Al Butler, Secretary Wicklow Deer Society

