



Wild Deer Association of Ireland

A NATIONAL ASSOCIATION FOR DEER MANAGEMENT AND CONSERVATION

Draft Policy Vision for Deer Management In Ireland (2nd Draft, September 2012)

Responses by the Wild Deer Association of Ireland
PO Box 31
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Introduction

Since its establishment in 1981 the Wild Deer Association of Ireland (WDAI) has grown to become the largest organisation of its kind in Ireland, representing those involved in deer management, deer stalking and people with an interest in the conservation and well-being of Ireland's wild deer herds.

The Wild Deer Association of Ireland is recognised as a leading authority on wild deer in Ireland, hosting events throughout the year with the aim to develop the knowledge and skills of our members and the general public. We host numerous events, seminars and international deer experts on issues relating to deer and deer management. We work closely with government departments on issues of mutual interest and have been instrumental in amending legislation to the benefit of deer and those involved in their management. The Wild Deer Association of Ireland is one of the founder members of Deer Alliance, the assessment committee set up to oversee the Hunter Competence Assessment Programme (HCAP), which provides a first step to developing the knowledge and competence of deer managers and deer stalkers by providing a recognised qualification.

In addition, we are a member of FACE which is recognised by the European Commission as the main discussion partner, representing Europe's 7 million hunters, and is consulted by the relevant Directorate-General during the elaboration and monitoring of EU legislation dealing with hunting, wildlife management, nature conservation, firearms, wild animal health, game meat hygiene, etc. We are also a member of CIC International which represents hunters in over 80 countries around the world.

Through our national membership and various social media outlets we run numerous campaigns promoting the discussion of topics such as the illegal taking of deer (poaching), road traffic accidents involving deer and the support of landowners who suffer genuine deer crop damage.

The Wild Deer Association of Ireland has been to the fore in recent years in calling for the implementation of a National Deer Management Strategy and will be a key stakeholder in any policy regarding deer management.

2nd Draft Overview

The documents commitment to developing a national policy for deer management in Ireland is to be welcomed along with recognising such issues as the financial benefits deer & deer stalking brings to the rural economy. Understanding the key benefits from the sport of deer stalking required to obtain appropriate deer management objectives. Acknowledgement of the increase in the illegal taking of deer (poaching) and the illegal trade in venison.

Our understanding is the basis of this document was formed from the outputs of a public consultation held in November 2012, however on reviewing the published submissions it appears there are a number of significant proposals not included in any submissions received.

The document references “basic data on deer density levels across a range of different habitats” is required to develop a sustainable deer management policy. However Minister such comments as “growing problem of increasing deer populations in Ireland” these and other comments are of great concern and unhelpful and contrary to the overwhelming view of our members in all regions, NPWS staff and respected academics regarding current deer numbers.

The document makes little if no reference to the Wildlife Acts under which deer are a protected species. Elements of the document are very ambitious & time consuming we would suggest a more simplistic approach.

3.5 Policy must also recognise that current strong market values for venison have led to an up surge in both illegal deer hunting and illegal trade in venison. Strong measures are required at all levels to prevent the introduction of illegally sourced venison to markets

Response

- We support this reference along with increased measures by the DAFF & DAHG staff in addressing this illegal activity, inspection measures would also be required for those granted a commercial licence. The absence of game handling establishments in the submission process to date is noted.

6.4 Separate licensing systems should be developed to distinguish licensed recreational hunting from licensed commercial hunting to aid the regulation of trade in venison and prevent trade in illegally hunted meats. Provision of a valid tax clearance certificate and declarations should be a requirement for commercial hunting licences.

Response

- All transactions involving the sale of venison should also require a PPSN number to be supplied. Revenue should become involved in this cash business. It is concerning to note the FSAI/DAFF game handling courses been promoted as a free course for the unemployed or canvassing of Game Handling establishments to promote such courses, evidence would show the illegal taking of deer is not limited to but prominent amongst the unemployed, lured by the attraction of easy and non traceable cash transactions. Strict regulation & monitoring would be required for the issuing of a commercial licence to avoid exploitation by those involved in the illegal taking of deer.

6.5 The current system whereby DHL (Deer Hunting Licenses) applicants supply details of hunting permissions, places an unnecessary burden on the issuing authority, in terms of administration. It is strongly open to misuse, and as an annual requirement, is in itself a potential barrier to consistent year-to-year deer management on lands concerned.

Response

- The DHL system should be strengthened to avoid abuse, currently DHL's are been issued at unprecedented levels without any regard of actual requirements or cull targets. Any relaxing of the current system for issuing DHL's should be avoided to avoid unnecessary safety risks & poor deer management practices. The administration process of DHL's could be improved through an online application process.

6.12 Policy should address other firearms issues as they relate to deer management, such as the issue of appropriate firearms calibres for smaller invasive species, and the use of shotguns, tranquiliser guns, and appropriate training for personnel using such firearms. This may require amendments to existing firearms legislation. In this regard, the use of vehicles, night-shooting, trapping, tranquilisation and other control methods and associated techniques

Response

- In the absence of appropriate policing of our Wildlife Acts, training, data & resources to allow any introduction of night shooting, shotguns etc for managing deer should be avoided. This practice is only required by a minimal number of NPWS/Coillte staff nationally in high recreational areas.

7.3.4 All lands, including forest properties, Coillte deer leases and licensed deer hunting on private lands within DMUs would be included in the overall deer management strategy for that DMU. This would be supported in law by a suitable statutory instrument issued under the aegis of the Forestry Acts, or under the Wildlife Acts.

Response

- We would strongly disagree with this view, there is no scientific data or other factual evidence to suggest this is required. Where individual landowners hold a reservoir of an unmanaged & unsustainable deer population a local solution should be formulated working with the effected stakeholders. It is noted the submission process to date is predominately represented by Co Wicklow based landowners with a notable absence from other regions where deer are present, this could lead one to believe there may not to be an over population of deer other than some areas of Co Wicklow. The majority of those involved in deer-stalking/ management do so to the required levels of maintaining a sustainable deer population, over a life time in many examples. Any actions that would undermine these management practices should be avoided, such as DMU's are suggested in their current format.

7.3.8 Deer Managers could be drawn, but not exclusively, from existing personnel within DAFM, NPWS and from the DAFM registered foresters list on a voluntary basis. All personnel would be subject to an appropriate code of conduct. All such personnel would be trained to a recognised standard using a curriculum developed jointly by DAFM/NPWS.

Response

- Other than the training requirement this suggestion is of great concern & suggests a non inclusive approach, furthermore it demonstrates a lack of understanding of current practices, knowledge-base & training by excluding current deer managers, deer-stalkers NGO's who already provide deer management to a satisfactory level in most areas. The Deer Alliance made up of the relevant stakeholders in this policy vision, since 2005 has provided a successful & recognised training standard for deer management and could be further expanded to include any additional requirements.
- The omission of a representative from deer stalking/management stakeholders in the Inter Agency group to date, we feel is a lost opportunity, as organisations such as the Wild Deer Association of Ireland and the Irish Deer Society are at the heart beat of deer management and related issues in Ireland, containing the knowledge and experience required in drafting and implementing such a policy vision.

7.3.12 Recreational hunters operating in DMU's would be allocated tags according to target harvest levels. Each hunter would be allowed an agreed minimum quantity of tags without charge at the beginning of the hunting season, based on the allocated cull. Unused tags must be returned and accounted for at the end of the season. Tags would consist of trophy tags, which would have a fee attached, and hind cull tags which would have no charge attached. Additional tags over the allocated cull limit would carry a commercial fee.

Response

- A tagging system is something we have suggested for sometime however it is a meaningless exercise at this point in the absence of any meaningful data to support tag allocations. There are practical issues such a system would face versus their use in other countries due to our current deer ranges and culture towards deer management. Tags should only be used to provide meaningful data & traceability and not the promotion of any stakeholder interests. In the current economic climate & due to recent increased costs in providing deer management we would see any fee for the issuing of tags as unacceptable & only serve to restrict deer management, other than where commercial interests apply, where trophy tags may be appropriate.

7.3.17 Recreational deer hunters would operate at DMU level through a club system, analogous to existing current structures such as district gun clubs. To obtain a licence and tags to hunt in a particular DMU, hunters will have to join the club for that particular DMU. Clubs would operate under the aegis of a suitable national body. DMU hunters will be responsible for anti-poaching measures within their own catchment, under the guidance of the DM and in conjunction with the relevant authorities NPWS/Garda Siochana.

Response

- We would have grave reservations about this suggestion and why it is included in the draft document. Again this suggests a lack of understanding on how deer management is undertaken in Ireland. While local deer management is a preferable option. Such management practices in other countries form part of a culture developed over generations, whereas Ireland has a varied approach due to a number of factors. In addition many deer ranges are not in gun club areas. Gun clubs are increasingly fragmented and closed to members outside their own communities, which would restrict many deer managers/stalkers & existing deer management arrangements. Gun clubs manage small game and vermin, not deer. Fishing clubs manage fish populations, not deer. While there have been suggestions gun club members have recently taken an interest in deer management, the reality is that the majority have no interest or knowledge in deer management & this suggestion may have introduced for other reasons. Small game & deer management practices are not linked & this is reflected in legislation in other countries such as the UK where deer are protected under separate legislation to that of game.
- A possible suggestion would be to appoint a regional coordinator to areas where factual data shows a high population of deer unsustainable to the local habitat & land uses, such a person would have access and an open line of communication to resources in that area such as deer managers, NPWS, IFA, DAFF etc when required, they would also be responsible for setting cull targets, implementing anti poaching measures etc.

7.3.19 The system could be initially funded by the agencies concerned in the initial start up-phase. Fees for training, DHL fees, DMU or DMAA membership fees, and commercial operator fees would generate revenue that can in turn be used to administer the system. For example, with 5,000 registered hunters, a €100 DHL fee would generate €500,000. This fund could in turn cover provision of deer manager expenses, training and IT infrastructure.

Response

- In the current economic climate this has the potential to increase the illegal taking of deer. We would not see the introduction of DHL fee as appropriate at this time, however with the commitment of funds been allocated to the required resources such as anti poaching measures, it is something that deer stalker/managers may accept in the future.

Conclusion

The Wild Deer Association of Ireland fully supports the implementation of a National Deer Strategy based on accurate data & cognisant of land uses for all stakeholder groups. We look forward to working with all stakeholder groups on drafting & implementing a National Deer Strategy.