



## **IFA Submission regarding the Draft Deer Management Policy Vision**

Farmers are those most affected directly as a result of the uncontrolled increase in the deer population which has been allowed occur. On a daily basis farmers are having their grass grazed, crops, forests and fences damaged, the health of their animals jeopardised and the safety of themselves and their family members put at risk on the roads around their homes. This situation cannot be allowed continue. As the representative body for the largest private landowner group in the country the concerns and issues raised must be addressed and dealt with effectively in the Deer Management Policy being developed. The IFA must be directly involved in the establishment of national policy and represented on all DMU's and steering groups in order to achieve the objectives which are vital to remove this financial burden and threat to safety. A nationally structured but locally implemented deer management policy is long overdue for Ireland.

Deer have become a major issue in the forestry and agriculture sector where they are having a negative impact on farmer incomes, animal health and farm safety. Detailed below are the issues which must be included/addressed in the policy document.

### **Animal Health/T.B.**

The issue of TB spread between deer and livestock must be addressed in the policy. Uncontrolled and excessive deer populations are adversely affecting animal health, farm incomes and our national livestock industry. TB is known to be present within the deer population. Uncontrolled populations are increasing the risk of this dangerous disease being passed to livestock and prolonging outbreaks on farms. A reduction in the number of deer in these areas is vital to reduce this health risk. The deer management policy must include a facility similar to the Wildlife Control Programme for badgers where a T.B outbreak occurs. This must facilitate the immediate removal of deer if they are associated with the TB episode.

### **Loss of Grass to Deer Grazing**

One of the biggest costs to farmers as a result of an overpopulation of deer is the loss of grass due to grazing. This is especially harmful on early spring grass levels. Studies show a substantial loss in production which is often over looked when evaluating the negative effects of deer. There must be facilities put in place to protect farmers from this unacceptable loss. The DMU must work in conjunction with farmers where this damage is being caused to reduce the entire catchment areas population levels of deer to what is tolerable for the individual affected farmers. If this cannot be achieved, compensation must be paid to the farmer for the losses incurred.

### **Areas of Severe Damage**

The IFA has identified and submitted to the forest service a map of the areas throughout the country that are experiencing unacceptable levels of deer damage, disease risk and road safety hazards. These areas must be dealt with in advance of the implementation of a Deer Management Programme.

The IFA were given a commitment that measures would be in place by the 1<sup>st</sup> of September 2012 to deal with this however, to-date no structure has been put in place. Immediate action is required to alleviate the difficulties being experienced by farmers in these areas. (*Map Attached*)

### **Private Forestry**

Private forestry is incurring substantial losses as a direct result of uncontrolled deer populations. Hardwood plantings have also been suspended in many areas because of deer. Damage is occurring both at initial establishment stage and later in the rotation, through bark stripping and leader grazing. The high population densities of deer in many areas of the country are restricting species selection and affecting economic returns to landowners. These issues must be addressed in the interests of farmers and the state, who have invested heavily in crop establishment and are now suffering production losses and decreasing return potential as a result.

### **Farmers Right to Protect Crops and Animals**

Deer damage is an issue which can affect farmers throughout the year. However the shooting season is restricted to prescribed dates and a Deer Management Programme may have stated plans or objectives for a particular area. These issues cannot prohibit a farmer from taking the necessary steps to protect his crops and animals. The programme must also provide the necessary supports to enable this to be carried out. Out of season deer management options must be easily available and functional for the farmer. A procedure must be set in place to allow for affected areas to be swiftly and efficiently dealt with, where losses or disease risk are evident.

### **Deer Management Units**

While we approve of the idea of the DMU's, considerably more information is needed in order to clearly establish who is responsible and ultimately accountable in ensuring these units meet the stated objectives of the policy and their obligations.

### **Access and Hunting Rights**

Relating to Section 4.3, the issue of access onto private land must be included in the policy. Access onto private lands for shooting of deer can only be with the consent of the landowner. Regardless of the time of day, there should be no situation where a hunter enters onto private land without the prior consent of the landowner.

### **There are a number of issues within the Draft Deer Management Policy Vision document which require amendment/clarification**

- There is an unquestionable appreciation of the biodiversity and social values of wild deer populations in Ireland. However, these benefits should be achieved through native deer species only. Therefore, the Policy Vision should focus specifically on a dramatic reduction of invasive non-native species and on the sustainable management of our native deer populations. Farmers, who are the landowners affected by these non-native species, are no longer prepared to support their rapidly multiplying populations through the economic and production losses being experienced. The aims outlined in **Section 2 Point 5**, under **Environmental/ Conservation Issues**, relating to deer should be incorporated into the overall project objectives. This point (5) is in line with our own views in the clear distinction which is made between the different Irish deer species and the need for management practices to reflect these distinctions.

- In the **Executive Summary** the term ‘appropriate levels’ is mentioned. Later in the document the term ‘acceptable population limits’ is used. These are ambiguous terms which require clarification. Appropriate population levels to be used for the local or National Deer Management Policy will need stakeholder input and agreement and we feel that this should be clearly outlined in the text and based solely on what is acceptable or tolerable for the affected landowners. These levels must be dictated by the landowners who are incurring the majority of the costs of sustaining these animals and not by those who are solely profiting from their presence.
- In an overall evaluation of the **Executive Summary**, as an overview of the entire policy vision and its objectives, the following inclusions should be made:
  - The issue of health and safety associated with excessive deer population levels requires greater inclusion. Uncontrolled and high concentrations of deer are a health risk in terms of disease spread among farm animals and they also present a hazard to road users. These two issues should be fundamental to the policy vision and outlined objectives.
  - Within the summary it is important to incorporate flexibility and freedom for the landowner to deal effectively with deer on his own land if the situation arises. It must not be forgotten that the landowner is endeavouring to generate an income from the land and when deer impact on this it is his responsibility and must be his right to deal with it.
- In the **objectives section**, alongside the objectives of managing for environmental or social values, one of the primary aims of this policy must be the reduction of the negative impacts that deer are having on the livelihoods of farmers and rural Irish citizens.
- It is also important to note that while deer management plans may be indicated and applied to certain areas it is not acceptable for these management plans or deer population levels to have any effect on a farmer’s decision to change his land use at any point in the future.
- With regard to the establishment of the DMU’s. We feel that they will form an essential structure to the National Deer Management plan and we welcome their introduction. In order for them to be effective in an area they must have a broad focus and must be able to affectively influence the management of deer over a large area of land. While local deer management is important it will prove ineffective unless the greater area is considered and managed correctly in conjunction with the smaller units.
- **Section 4 point 4.3** outlines a reoccurring issue which needs to be resolved. A farmer that is affected by significant deer damage in his area and is suffering economic loses as a result should not be prevented from taking action because there is an issue with the sporting rights of the land. While the farmer is paying for the deer through grass and crop losses, the hunter with access to the sporting rights is using the deer for sport and enjoyment. The authority must be given to the landowner to implement the control of deer which are affecting his method of income generation and any supports necessary to achieve this must be provided.
- Also in **section 4, point 4.5** deals with the involvement of landowners in the DMU’s. The wording states that policy should ‘support the involvement of landowners in local deer management groups’. It is an essential requirement that the Unit has direct involvement from landowner representatives in and adjacent to the management area and that landowner representative’s participation in DMU’s is a fundamental requirement of their establishment.

- There is no **appendix 4** attached to the document.. We request that this be provided for analysis and comment.
- Stakeholder involvement, in particular, at the key decision stages must be limited to landowners as these are the people directly affected by the severe damage caused by deer.
- Deer are a valuable resource both environmentally and socially with tourists and locals benefiting from their presence across the country. It is the farmer who is funding this resource through land and crop grazing. Therefore farmers must be adequately compensated for the provision of this resource and losses incurred if the policy fails to satisfactorily reduce the levels of deer to what is tolerable.

Farmers have incurred the costs, losses, disease problems and safety threat for far too long as a result of inaction which has allowed the deer population grow to what are now unsustainable and intolerable levels. The Deer Management Programme cannot be yet another idealistic vision which does little to address the real problems and costs incurred by farmers as a result of lack of deer management. The necessary funding and resources must be provided to deliver real results that ensure farmers livelihoods and safety is no longer threatened. The points and issues raised above must form the basis of the final policy document. While many enjoy deer for both sporting and aesthetic values, it is the farmer or landowners of Ireland who supply these benefits and incur income losses and disease outbreaks as a result. This situation cannot continue in the absence of acceptable compensation being paid. Policy must be implemented which will enable the introduction of co-ordinated deer management to protect farmer interests and manage our native deer populations in a long term sustainable manner.

Michael Fleming, Chairman National Farm Forestry Committee  
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James Hill, Wicklow County Chairman  
Michael Flynn, Galway County Chairman  
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