



Irish Deer Commission

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A Review of the National Parks and Wildlife Service 2021

A RESPONSE

to Minister of State for Heritage and Electoral Reform,
Malcolm Noonan TD issued on March 8th, 2021.

Compiled by

The Irish Deer Commission on behalf of its Executive and Membership

March 31st, 2021

1: INTRODUCTION

1.1: This response follows an invitation issued on March 8th, 2021 to the Irish Deer Commission (IDC) by Dr Micheál O Cinnéide on behalf of the Minister of State for Heritage and Electoral Reform, Malcolm Noonan TD, and Independent Chairperson Prof. Jane Stout regarding a review and consultation of the remit, status and funding of the National Parks and Wildlife Service (NPWS), to ensure that it plays an effective role in delivering its overall mandate and enforcement role in the protection of flora and fauna.

1.2: IDC is a respected NGO with membership drawn from all deer management sectors - licensed deer hunters, both professional and part-time, academic, landowner and forestry interests, our scientific advisor is the highly respected Dr Ruth Carden. IDC is an active lobby group and registered under Lobbying Act 2015. IDC has a close working relationship with stakeholder groups including IFA, Coillte Teo, An Garda Síochána and NPWS. IDC have become the first port of call for regional and national media on deer related matters. IDC host a busy schedule of online events and courses with the aim of promoting and encouraging efforts to improve the management and conservation of our wild deer.

2: OVERVIEW OF DEER MANAGEMENT IN IRELAND

2.1: Deer are a protected species under our Wildlife Acts and an important part of our natural heritage with deer present in Ireland since Neolithic times. Deer numbers at sustainable levels are an asset both economic, visual, and sporting, however where deer numbers become excessive, they can have negative impacts on land objectives such as farming, forestry, and the wider ecosystem. In the absence of a natural predator, it falls on licensed deer hunters to manage their numbers.

2.2: Data supplied to IDC by the National Parks & Wildlife Service (NPWS) show 5,838 deer hunting licences were issued by the Wildlife Licensing Unit under Section 29 of the Wildlife Acts in the 12-month period up to February 28th, 2020. The number of licences continues to grow annually due to an increase in the popularity of deer hunting. Over the last 10 years the number of licences has grown by 56% or 257% since 1999/2000. This level of continued growth creates service and administrative issues for both NPWS and service users. On March 30th, 2021 IDC made a submission to Minister of State, Malcolm Noonan, TD regarding the current legislative and administration arrangements for deer licensing in Ireland.

2.3: Additional data provided by NPWS show 44,381 deer were culled by licensed deer hunters in the 12-month period up to February 28th, 2020. Similar data shows an increase of 42% in the number of deer culled over the last 10 years or 380% since 1999/2000. It is important to note this data is based on annual hunter cull returns which is not

independently verified, hunter cull returns require the applicant to sign a declaration of accuracy.

2.4: Despite claims of growing deer populations, in the absence of national and verified deer density data, the true deer population is unknown in Ireland. In the absence of data, the current levels of annual deer culling maybe appropriate, require additional culling or have negative consequences for the future conservation status of our wild deer. Anecdotal evidence from those involved in deer management would suggest a small number of localised areas have excessive deer numbers, where in most areas' deer are being managed at a sustainable level. County Wicklow accounted for 36% of national cull in the 12-month period up February 28th, 2020, with five counties accounting for 75% of the national annual deer cull.

Conclusions that the increasing deer cull returns are linked to an increasing deer population should be avoided as data shows the increase in deer culled has a direct corelation to the increase in the number of hunting licences, with the average remaining at 7/8 deer culled per hunter, per season, since 2004. Often expanding deer range (the area where deer are present) is confused with deer density (the number of deer).

Landowners who suffer genuine crop damage from deer can apply for a permit under Section 42 of the Wildlife Acts to cull deer outside the open hunting season (September 1st to February 28th) data shows less than 0.25% of landowners have a requirement for such a permit suggesting deer conflict or high deer densities are the exception but where these occur landowners should receive additional support.

There is no open season for Red deer in Co Kerry due to their national conservation importance. While deer densities appear excessive within Killarney National Park, outside the Park it would appear Red deer numbers are low to sustainable. A conservation threat remains from Sika/ Red deer Hybrids in the West Cork area, and non-native Red deer in Co Limerick.

2.5: While progress has been made in recent years deer management knowledge among all stakeholder groups is low, often leading to arbitrary and misinformed claims about deer and their management. There has been increased pressure from farming organisations aimed at NPWS and Department of Agriculture, Food, and the Marine (DAFM), while well founded this approach can lead to misinformed and poor deer management practices along with animal welfare issues. DAFM is a key stakeholder, but should refrain from deer conservation and management issues, to avoid an obvious conflict of interest.

3. NPWS AND IDC ENGAGEMENT

3.1 IDC engage with NPWS on an ongoing basis under the following headings:

- Wildlife Crime
- Wildlife Licensing
- Education and training
- Deer Management
- Media

3.2 **Wildlife Crime** – NPWS, along with other government agencies and NGO's, support our awareness campaign – “Keep Deer Poaching in Sight”, with the NPWS logo forming part of the campaign promotion material. (See Appendix A)

IDC also operate a Wildlife Crime reporting facility for members where suspected incidents of the illegal killing of wild deer (deer poaching) can be reported. Reports which meet a criterion are escalated to An Garda Síochána and NPWS for investigation. While there have been improvements in recent years, the response from NPWS can be ad hoc depending on the availability of local resources, knowledge of wildlife crime and workload. We regularly hear of frustration from Conservation Rangers of not been able to protect wildlife against criminals due to restrictions imposed by Divisional Management, lack of resources, restrictions within the Wildlife Acts or workload due to non-conservation work such as planning applications. The recent announcement of a dedicated Wildlife Crime unit in NPWS is to be welcomed and we await its implementation, coupled with resources, policy, strategy, and governance.

3.3 **Wildlife Licensing** – deer management is a licensed activity under section 29 of the Wildlife Acts. The Wildlife Licensing unit of NPWS issued 5,838 deer hunting licences in the 12-month period up to February 28th, 2020. Interest in deer management has grown significantly (257%) since 1999 and the number of licences issued each year continues to increase by circa 6% annually, this combined with Covid-19 restrictions created service issues and backlogs during the 2020/21 open deer season. IDC have a positive and constructive working relationship with the Wildlife Licensing Unit staff and recently held a meeting with NPWS management with suggestions on how to improve administrative arrangements for our members.

On March 30th, 2021 IDC made a submission to Minister of State, Malcolm Noonan, TD regarding the current legislative and administration arrangements for deer licensing in Ireland.

3.4 Education and Training – IDC hold regular training and educational events for our members focusing on best practice deer management and related activities. Our events include activities in National Parks. Local Park management and conservation rangers have always been supportive and accommodating of these activities.

On October 24th/ 25th, 2020 the third [National Wildlife Crime Conference](#) took place online due to Covid-19 restrictions. IDC were part of the organising group and the sole deer organisation represented, we received positive support from NPWS.

3.5 Deer Management – the management of wild deer in Ireland is an emotive topic and often can lead to entrenched and polarised opinions, with NPWS on the receiving end of continuous pressure from interest groups, in particular farming interests who perceive deer as a pest or vector of disease. Instead of engagement and clarification, NPWS increasingly “stick their head in the sand” on this issue which creates a vacuum of misinformation and the increased involvement of the much larger and influential Department of Agriculture, Food, and the Marine, this has been detrimental for deer conservation and management.

The management of deer is the responsibility of the landowner or the owner of the sporting rights, this includes our six National Parks where deer management is the responsibility of NPWS. A basic requirement of deer management is a plan or a deer management plan, where the deer population is known by sex, age and species combined with local habitat and land use factors a cull plan is devised. Under a recent Freedom of Information Request, we were informed only one of our National Parks (Glenveagh, Co Donegal) has a deer management plan. This shocking statistic highlights the lack of priority, and deer management knowledge within NPWS. This situation has continuously deteriorated since 2008 due to a recruitment freeze, lack of resources, and poor succession planning.

Renowned deer management academic and international advisor Professor Rory Putman recently stated regarding the current deer management position in Ireland, “it is crucial the management decisions are well-founded, not simply arbitrary, seat-of-the pants as a result of political and landowner pressure” such interference has become the norm in recent years.

3.6 Media – IDC is the first port of call for regional, national, and international media queries on deer related matters in Ireland. Poor external communication and engagement by NPWS with stakeholders can often lead to opposing views, or unnecessary corrections in the media that could be avoided by open and regular engagement and communication.

4. Observations on NPWS current role and performance

As an agency whose remit and mandate are enforcement, protection, and conservation of flora and fauna we believe NPWS is not fit for purpose in its current form, this is not due to the individuals who make up NPWS but because of long standing organisational and funding shortcomings.

For example, a comparable agency is Scottish Natural Heritage with annual government funding of €63.4 million (2019) in comparison to NPWS with annual funding of €28.8 million (2021) such under funding has been detrimental to NPWS and its work.

The key challenges we experience when working with NPWS are:

- Lack of government funding.
- Lack of dedicated resources.
- Poor succession management.
- Focus on non-conservation and protection duties.
- No clear identity or focus due to regular movement of NPWS between Government Departments.
- Poor stakeholder engagement.
- Unable to attract the required number of skilled and professional staff due to current pay scales.
- Poor primary legislation.
- Outdated process, reactive and lack of vision.

5. NPWS future Role and Structure

From an IDC and service user perspective, NPWS should be:

- Enforcers, implementors and educators of legislation that protects our flora and fauna.
- As an organisation linked to the Department of the Environment, but with more autonomy and a clearly defined, independent structure, but without an independent legal status.
- As an organisation linked to the Department of the Environment, NPWS would be part of every local authority and county development plan, embedded into the local community and have an input into the education and enforcement of relevant flora and fauna legislation and EU Directives.
- An organisation that leads, embraces, feedback, and engagement with all stakeholder groups.
- Government funding and staffing levels need to be significantly increased to appropriate levels, with specialist units and divisions adequately resourced.

- All our National Parks should have an appropriate deer management plan, and adequately resources to undertake selective, gradual, and evidence-based deer management.
- All services provided by NPWS to service users are current and available online.
- While deer management is the responsibility of the landowner or sporting rights owners, NPWS in conjunction with stakeholder groups should take the lead on education and enforcement.

Irish Deer Commission

Website & Membership: www.irishdeercommission.ie

Membership Queries: membership@irishdeercommission.ie

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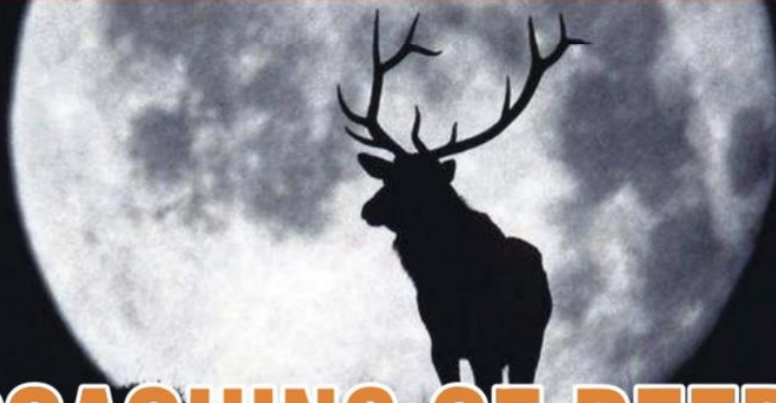
Deer Poaching (members only): deerpoachingreports@irishdeercommission.ie



Appendix A –

- IDC, NPWS campaign poster – “Keep Deer Poaching in Sight”.
- Wildlife Crime Information Page and Reporting Option [Click Here to View](#).

KEEP DEER POACHING IN SIGHT



POACHING OF DEER is illegal and dangerous!

- The illegal or unauthorised hunting of deer (poaching), is undertaken in a variety of ways including - shooting at night under spotlight, or outside the designated hunting season (Sept. 1st - Feb. 28th), snaring, trapping or coursing of deer with dogs.
- This often causes injury and unnecessary suffering to the animals and it puts people and livestock at risk of injury or death. It inhibits the successful management and conservation of Ireland's deer species.

What should you do if you suspect poaching is in progress?

- **Never approach.** Take note of all relevant details (time, location, vehicle description - make - colour - reg, number of persons etc)
- **Immediately report the incident to An Garda Síochána and the local National Parks and Wildlife Service**



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E-mail: deerpoachingreports@irishdeercommission.ie



THIS MESSAGE IS SUPPORTED BY:



An Roinn Cultúir,
Oidhreacht agus Gaeltachta
Department of Culture,
Heritage and the Gaeltacht



abritish
deer society



Countryside
Alliance
Ireland



The Irish Deer Commission, facilitates its members to report suspected incidents of deer poaching or the illegal killing of deer. This facility is open to members of the Irish Deer Commission only. If you are not a member, go to the membership section of our website, and apply online. Once your application is approved, you can use our Deer Poaching Report facility.
The Irish Deer Commission does not make a judgement, hold a view or investigate any reports received. All fully completed reports are forwarded to our counterparts in the relevant agencies for investigation.
We will only process completed reports, where the following information is provided: 1. Location of where the suspected deer poaching incident took place; 2. Date and time of the suspected deer poaching incident; 3. Your name, contact details and membership number are provided. All reports will be treated in the strictest of confidence.