



Irish Deer Commission

irishdeercommission.ie

Joint Committee on Agriculture, Food, and the Marine

Wednesday, 13th December 2023

**Eradication of Bovine TB and the Irish Deer Management
Strategy Group**

Submission from the Irish Deer Commission

Dear Chairman, Deputies, Senators,

I am writing to you on behalf of the Irish Deer Commission to make a submission in advance of your meeting today to discuss Bovine TB eradication, and the Irish Deer Management Strategy Report, published on December 7th, 2023.

The Irish Deer Commission is a respected NGO with a national membership from all deer management sectors - licensed deer hunters, both professional and part-time, academic including our scientific advisor Dr Ruth Carden recognised as a leading expert on deer in Ireland, landowner, and forestry interests. The Irish Deer Commission is an active lobby group registered under Lobbying Act 2015. The Irish Deer Commission has a close working relationship with a wide range of stakeholder groups and government agencies.

The Irish Deer Commission have become the first port of call for regional and national media on deer related matters. The Irish Deer Commission host a busy schedule of events and courses with the aim of promoting and encouraging efforts to improve the management and conservation of our wild deer. The Irish Deer Commission operate a national Humane Deer Dispatch scheme where 135 trained volunteers assist the agencies who deal with deer vehicle collisions under the Animal Health & Welfare Acts 2013. Our members work in partnership with landowners to manage deer at sustainable levels, with over 55,000 deer culled annually under licence based on data received from the National Parks & Wildlife Service, a new record for the number of deer culled in Ireland.

Our submission covers two topics, Wild deer and TB, and a review of the Irish Deer Management Strategy Report, based on feedback sought and received from those who manage deer and the Officers of the Irish Deer Commission.

Wild Deer and TB – the Irish Deer Commission understand Bovine TB is a devastating disease for rural Ireland and we should do all we can to support those impacted and reduce the presence of the disease in Ireland. However, we also have a duty of care not to unintentionally misinform or give false hope to those impacted by Bovine TB that by culling wild deer will lead to a reduction in Bovine TB.

Deer like many of our wildlife species such as foxes, hedgehogs, act as a reservoir for TB but at very low levels. The exception to this is the badger where higher levels of TB are found, and their unique method for spreading TB. In the case of deer, we know through veterinary testing at Approved Game Handling Establishments around the country less than 1% of animals tested, test positive for TB.

It is important we follow the science and evidence when looking at TB and wildlife, below we have outlined some of the reports and evidence on deer and TB in Ireland.

Dr Eoin Ryan, Department of Agriculture, Food, and the Marine – Dr Ryan who has given evidence previously to the Joint Committee on Agriculture, Food and the Marine, and one of the most respected scientists on this topic, has quoted on several occasions there is no link between deer and the spread of Bovine TB in Ireland. In the following article Dr Ryan is interviewed on this topic – [Dr Eoin Ryan, Agriland Interview](#).

Wicklow Deer Management Report - The Irish Deer Commission obtained this report (see attached) following an FOI appeal and contains some good news for farmers impacted by bTB, with just 9 deer or 0.60% of total cull from the project testing positive from a cull of 1,580 in the Wicklow area. Two of the three areas of the county covered by the project showed no deer testing positive for bTB despite the presence of high deer densities, which

demonstrates there is no correlation between the presence of deer and bTB, and that there are isolated blackspots of bTB in the testing area. Unfortunately, the headline from this report was misreported and based on the small number of deer testing positive using a unique and a far more detailed culture test rather than as a percentage of the overall cull/sample versus how cattle TB rates are reported (county level or per 1,000 cattle tested using a skin test or less detailed culture test in a small sample).

Irish Deer Management Forum Recommendations – this document (see attached) relates to the original 2015 DAFM report on TB in wild deer, the forum included scientists from DAFM and other agencies, point 6 states “. The IDMF’s recently formed Data Sub-committee has confirmed that there is no evidence to link Bovine TB incidence in deer in Ireland or the UK to Bovine TB outbreaks or persistence in cattle herds.”

Cattle and Deer TB strains – this document (see attached) relates to research undertaken by DAFM as to the TB strain types found in the 2015 Wicklow project into deer and TB. The document also discusses in its conclusion the unique nature of the test used and that comparisons should not be made between how cattle are tested, and the unique circumstances under which the testing took place – 8 times more detailed than the standard cattle TB test, with testing only taking place in farms where TB was found in livestock.

Similar testing took place in County Sligo and South Kerry where high rates of bTB was present in cattle, but no positives were detected in the deer sampled.

Scotland has been TB free since 2009, despite having a large deer population and farming community. Restrictions on cattle movements and biosecurity measures are believed to be the main factor behind the countries TB free status.

Irish Deer Management Strategy Report - The Irish Deer Management Strategy Group report was published on December 7th, 2023, and we welcome the reports publication. The Irish Deer Commission played an active and key role in the consultation and sub-group process which led to the report recommendations. While there was not unanimous support among stakeholders for the recommendations contained in the report, the report contains potentially positive developments such as the inclusion of deer management training in agricultural, forestry, hunting, and environmental education courses, other recommendations may potentially have negative consequences for deer and deer management.

Open Season Changes - Changes to the current open hunting seasons for wild deer are expected in the coming months and will mirror those currently in Northern Ireland, with the female culling season being extended to March 31st from the current February 28th close date, and the male deer open season to be brought forward to August 1st, with the closing date extended from December 31st to April 30th. No open hunting season for red deer in County Kerry will continue due to conservation concerns.

The proposed changes to the open hunting seasons will be unpopular with many hunters, as culling females in March will mean deer are heavily pregnant, whereas other hunters will see this as part of their job and that females are always pregnant during the female open season starting on November 1st. The extension to the hunting season for male deer will cause animal welfare issues in areas as mature male deer are in poor condition post the deer breeding season and during bleak winter months when venison quality is poor due to limited feeding and up to 25% body weight loss during the breeding season. Moving the focus away from female deer to male deer is not consistent with reducing the deer population, as one male deer can breed with many females, culling females removed two deer at the same time as females are always pregnant during the open female deer season.

The Scottish government recently removed the closed male season in Scotland; however, this was met by a collective rejection by hunters and deer managers based on animal welfare concerns, with the majority continuing to observe the previous closed season. Lessons should be learned from this on future changes to the open hunting seasons in Ireland.

Deer Management Agency and Deer Management Units - A new independent agency is to be set up to oversee the management of deer in Ireland, and local deer management units are to be formed in areas where deer numbers are believed to be excessive.

We welcome the formation of the new agency but would have concerns that the agency will not be resourced with suitably qualified and independent individuals. In addition, experience in other countries is where such agencies are given statutory powers, it can be to the detriment of existing deer hunters and deer management.

The formation of additional deer management units is to be welcome, but we believe the naming of counties by Minister McConalogue is somewhat premature, as no criteria has been developed to determine when an area is a “deer hot spot” or requires a deer management unit, there is a concern the counties named by Minister McConalogue are as a result of political pressure and not based on any science or evidence. Some deer management units have already been in operation in County Wicklow, while there have been many positives from these units, some of the learnings have been to ensure the units are not overrepresented by any one sector, nor that existing hunters in the unit area are excluded.

Current deer cull and deer population claims - There are concerns around claims of known deer populations made in statements by Minister McConalogue even though the population trends remain unknown in any county. Currently a record number of wild deer are culled in Ireland with over 55,000 deer culled annually based on NPWS data, and there is concern Minister McConalogue is not making this information transparent in his statements. The record number of deer culled annually does not include the growing number of deer killed on our roads, nor the significant issue of deer poaching/ illegal killing of deer.

While some areas of County Wicklow clearly have unique deer issues, which is acknowledged in the Irish Deer Management Strategy Report, and we are seeing more deer in a small number of localised areas since the restrictions imposed on deer management during the Covid-19 pandemic and the subsequent closure of the venison industry, in the vast majority of areas deer appear to be managed at sustainable levels. The report does not highlight known areas for deer vehicle collisions as potential “deer hot spots” or conflict areas that may require a deer management unit to mitigate against such accidents.

We believe government needs to lead by example on deer management of state owned lands such as our National Parks, Department of Defence property, and state own legacy lands/ native woodlands, before asking the private landowners to manage deer.

We have seen a worrying increase in the number of deer shot and dumped indiscriminately in the countryside, a wildlife crime, these concerns have been mirrored by local National Parks & Wildlife Service staff, following a growing number of ill-informed comments by some political representatives attempting to reduce deer to the level of vermin, a protected species under our wildlife acts.

It is crucial that decisions we make regarding the culling of deer are well founded and evidence based, and not simply arbitrary seat of the pants comment as a result of political or land sector pressure.

Permits under Section 42 of the Wildlife Acts, Online Consultation, Science based deer management – while the report contains a number of potentially positive recommendations and resulted in stakeholders working together successfully, the Irish Deer Management Strategy report contains no science or other evidence as a basis for its recommendations. The report speaks about the increase in the number of section 42 permits issued under the Wildlife Acts for out of season deer culling requested by landowners as rationale, particularly in County Wicklow, but as a percentage of the overall farming population less than 1% of the farming population require such a permit annually. Several public meetings were held in counties such as Wicklow, Galway, and Tipperary in recent years to promote section 42 permits among landowners and streamline the application process in some areas which would have contributed to such an increase in permits, not to mention landowners who have a genuine need for such a permit.

The report also speaks about an Online Public Consultation launched in December 2022 by Minister McConalogue and closed in February 2023 with 1520 respondents. It is worth noting 1,354 of the respondents were either farmer, landowner, or listed as rural, while all stakeholder views are important, the findings of the consultation are predominantly from one sector. The consultation format and questions were widely criticised for their negative wording towards deer and appeared to create a predetermined outcome for the consultation.

Reality versus perception – an observation we made during the stakeholder engagement process and reviewing the Irish Deer Management Strategy Report is there is significant knowledge gap between some land use sectors perception of how deer are and can be managed versus the reality of managing deer in commercial forestry in Ireland. Deer are highly adaptable and react to hunting pressure by moving to new areas and becoming nocturnal, and any sudden increase in culling activity is likely to be counterproductive.

Positive and Negative Impacts of deer -

The report correctly identifies the negative impacts deer can have on farming, forestry, and other land uses when their numbers become unsustainable to the carrying capacity of their habitat combined with other land uses and herbivores present. We welcome the fact the report also highlights that deer are an important part of woodland ecology and the benefits they bring when their numbers are managed correctly.

The Irish Deer Commission, our members, and the wider deer stalking community play a vital role in managing deer numbers, without cost to the taxpayer. Deer stalkers work in partnership with landowners and are willing to offer their support when called upon.

The Irish Deer Commission would welcome to opportunity to meet the Committee and give evidence on this matter in more detail and answer any questions committee members may have.

Irish Deer Commission

December 13th, 2023