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Glenveagh Woodland Strategy Team  
Glenveagh National Park  
Donegal

May 13th 2022

**Re: Glenveagh National Park Woodland Management Strategy**

To whom it may concern:

Many thanks for sending us the proposed woodland plan for Glenveagh NP and giving us the opportunity to comment.

We very much welcome this initiative and wish it every success. The use of national parks and other public lands to demonstrate the feasibility of expansion of existing old woodland, and expansion of these through natural regeneration provides many opportunities. Not least of these is the chance to learn through trial and error so that the model can be used elsewhere. We hope that the ecological changes which arise as a result of implementing the plan can be closely monitored and documented, including through photographic records.

We also welcome the emphasis on education and outreach as public awareness of the importance of certain interventions, such as deer culling, is essential for wider success and acceptance.

It is noted that the plan aims to reduce deer density significantly but not to a prescribed level. It would nevertheless be worth recording the level of deer density that allows for natural regeneration as this would be a useful guide for other similar projects.

It is very welcome to note that you plan to expand deer control to other areas near the park.

Regarding the vision out to 2120 we feel that predation is a key natural process in natural woodland ecosystems that should be recognised. Despite the challenges, there is an opportunity here to introduce the conversation on the need to reintroduce top predators as a natural check on grazing, including wolves and lynx.

If the goal is to have naturally functioning ecosystems by 2150 a key action should be the identification of all processes and the associated species which are needed to fulfil those functions, e.g. disturbance from wild boar or the role of scavengers in nutrient cycling. It is important that forest health is not confined to vegetation but that the role of animals is fully acknowledged.

It is welcome that deer carcasses are to be left in situ. Monitoring of carcasses through the use of trail cameras can provide valuable insights from a research perspective but could be very useful public awareness tools (e.g. by streaming the footage on the web).

While it is appreciated that discussion of reintroducing these processes, and predation in particular, can be controversial, and while this plan may not wish to explicitly set an objective of reintroducing wolves and lynx, the vitally important place for these processes should at least be acknowledged.

There is very little mention of sheep in the plan. Is this because there are no sheep? Even in low densities the presence of sheep has the potential to seriously setback the advance of natural regeneration. Ideally, this plan should be nested within a wider plan for the Park and surrounds (something that was recommended as urgently needed in the independent review of the NPWS carried out in 2021). This should include incentives for surrounding farmers and landowners to complement measures within the Park through rewilding or high nature value schemes. A wider transition away from free roaming sheep is needed not only to protect woodlands but also blanket bogs and other sensitive habitats.