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Irish Wildlife Trust submission on the management of deer in Ireland

To whom it may concern,

The Irish Wildlife Trust (IWT) is a national, charitable, membership-based organisation which was established in 1979. Our goal has been to raise awareness of our natural heritage and its benefits to people and for over 40 years we have sought to do this through a combination of education and active campaigning for policies that recognise the inherent value of nature and biodiversity.

Red Deer

We note that of the three species of deer which are well-established in Ireland only one, the red deer, has a claim to being part of our native fauna. These 'native' red deer remain confined to a small part of County Kerry centred on the Killarney National Park where mismanagement and over-grazing (not only by the red deer but also sika deer, sheep and goats) have resulted in significant ecological damage. This has reduced the availability of forage for the deer which in turn has resulted in them turning to pastures where there is greater potential for conflict with landowners.

The IWT would like to see a comprehensive plan for the protection and conservation of the native red deer herd including restoration and expansion of the woodlands around Killarney, exclusion of domestic animals from these areas and a target of elimination of the non-native sika deer from this area.

Sika/Fallow Deer

Sika and fallow deer are non-native species. While accurate population assessments are not available, recent research has shown “marked increases in relative population density and extensive range expansion for each of the three deer species across Ireland”¹.

This coincides with poor status of habitats listed under Annex I of the EU Habitats Directive including all habitats associated with uplands (wet heaths, dry heaths, blanket bogs, alpine and subalpine heaths) as well as three out of four woodland types (old oak woodland, yew woodland and alluvial woodland) and where overgrazing has been identified as a factor in this unfavourable status².

Unfortunately data is not available on the finer scale of impacts within Natura 2000 sites but the distribution of deer species overlaps substantially with the presence of the aforementioned habitats so that on the balance of probability it can be concluded that deer are contributing to the problem of overgrazing, along with domestic and feral livestock.

Due to their established non-native status, and the damage that results to ecosystems from overgrazing, the IWT believes that sika and fallow deer should be recognised as alien invasive species and listed accordingly under Schedule 3 of SI No. 477 2011. This should then provide for the establishment of control measures to prevent damage.

Woodland Expansion

Ireland has significant ambition for woodland expansion as set out in the draft Forest Strategy (2023). This is nominally set at 8,000 hectares of new woodland per annum however both public appetite and climate targets which are as yet to be set under the Land Use and Land Use Change (LULUCF) sector are likely to see an even greater level of ambition. However, this will be difficult if not impossible to achieve with the current levels of grazing.

The quickest and most ecologically-based method for forest establishment and expansion is through prioritising natural regeneration³. However, tasty saplings are quickly targeted by hungry herbivores. Evidence from Scotland suggests that red deer densities must be at or below 3.5 animals per km² to allow for natural regeneration⁴. These are the levels of deer density that we must be aiming for in Ireland and research and data collection should be directed towards this scientific approach to deer management.

¹ Murphy et al. 2022. Bayesian areal disaggregation regression to predict wildlife distribution and relative density with low-resolution data.

² NPWS. 2019. The Status of EU Protected Habitats and Species in Ireland.

³ <https://www.kew.org/about-us/press-media/10-golden-rules-for-restoring-forests>

⁴ Rao S.J. Effect of reducing red deer *Cervus elaphus* density on browsing impact and growth of Scots pine *Pinus sylvestris* seedlings in semi-natural woodland in the Cairngorms, UK. *Conservation Evidence* (2017) 14, 22-26

Ecosystem Restoration

Deer management cannot be seen in isolation from the need to restore healthy, functioning natural ecosystems in Ireland. We know that for climate mitigation and adaptation, protection of water and biodiversity as well as human health, rebuilding natural ecosystems can bring the greatest number of co-benefits at the least cost. This includes reintroducing natural predators of deer which in Ireland once included brown bear, grey wolf and Eurasian lynx. Recent research found that the Irish landscape would not support the long-term survival of a reintroduced lynx population⁵. However, this does not mean that we should not be taking steps at a landscape scale to allow for this reintroduction to be viable. The restoration of predation is an essential and unavoidable measure which must be considered as part of long-term deer management in Ireland.

⁵ Guilfoyle et al. 2022. Assessing the ecological suitability of the Irish landscape for the Eurasian lynx (*Lynx lynx*). *Mammal Research* <https://doi.org/10.1007/s13364-022-00670-2>