

Submission on the review of the derogations under the bird's directive, on behalf of Co Monaghan Regional Game Council to the Department of Housing, Local Government and Heritage via e-mail: WildBirdDeclarations@chg.gov.ie

Co Monaghan Regional Game Council is made up of 26 Gun Clubs. We are affiliated to the National Association of Regional Game Councils (NARGC).

General:

The declarations to control certain wild bird species are important for Gun Clubs and their members in our RGC. The work carried out by Gun Clubs and their members in our RGC plays an important socio-economic and conservation role in Co. Monaghan. Co Monaghan RGC in association with the local gun clubs, are involved in the management Sliabh Beagh upland bog. This work involves the control of predatory birds, which can only be done if the derogations are in place. This conservation work has benefitted many vulnerable species, making it a good example of how management really works. Our work on Sliabh Beagh has saved many vulnerable species including Hen Harrier, Grouse, Lapwing, Curlew, Golden Plover, Meadow Pipets, Cuckoo is, and benefitted many more upland birds also

Gun Club members generally work closely with farmers and landowners to prevent serious damage caused by pest birds.

Conflicts involving birds are diverse in our RGC, hence it is important to have a derogation system that is simple and clear, which can be applied by individuals undertaking bird pest control:

- *in the interests of public health and safety,*
- *in the interests of air safety,*
- *to prevent serious damage to crops, livestock, forests, fisheries, and water,*
- *for the protection of flora and fauna.*

Satisfactory solution:

While a key provision of the law states that derogations require that “there is no other satisfactory solution”, our experience is that shooting and trapping for certain species provides a “satisfactory solution” to most of the problems encountered by Gun Club members or landowners/farmers. In some cases, non-lethal solutions such as visual or auditory deterrents are attempted to prevent serious damage, but shooting is frequently required to supplement the effectiveness of these as birds habituate quickly. When lethal shooting is used, birds associate the noise with a real risk, rather than just a startle response. These birds are intelligent and know their environment, and a repetitive noise or a stationery object is soon established as not being a threat and has lost its limited purpose.

Damage to crops:

The current system provides for control of:

- **Jackdaw and Rook (year-round, but not in January)**
- **Woodpigeon (year-round)**

Many Gun Club members in our RGC are frequently requested by farmers to prevent damage to crops by Woodpigeon, Rook and Jackdaw. The damage ranges from consumption of crops, damage to roots, and trampling. The damage can happen at any time but particularly after sowing, initial germination, or just prior to harvesting. It should be noted that late summer is an important period as crops can be damaged (e.g., by trampling) and or consuming grain, or vegetables. Now several farmers are experiencing problems with pigeons on oilseed rape, brassicas, and our members are active on their behalf.

Damage to livestock:

The current system provides for year-round control of:

- **Magpie**
- **Hooded Crow**

Many Gun Club members in our RGC are frequently requested by farmers to prevent damage to livestock by the bird species listed on the derogation list. Control is undertaken year-round, but most often needed in the springtime, during the lambing and calving season. Grey Crows continually mingled with sheep particularly. Heavily pregnant ewes occasionally get stuck on their back when they are not able to roll either way to get back on their feet. Grey Crows and Magpies will remove the eyes from the Ewe, pierce her body with their beaks, all done while the Ewe is alive. The Ewe if not dead, must be put down, as they will not survive the infections. The young of all domestic animals are prime targets for both Corvids. If the Grey Crow particularly pierce the skin of any animal, the infection transfer is generally fatal to the domestic animal.

Damage to livestock feedlots:

The current system provides for the control of:

- **Jackdaw**
- **Rook**
- **Timing: between November and May**

Many Gun Club members in our RGC are frequently requested by farmers to prevent damage to livestock by the bird species listed on the derogation list. Control is most often needed to stop those birds consuming and soiling food. These birds by this soiling can pass on several serious diseases to both sheep and cattle, it should be noted that serious damage to livestock feedlots can happen outside of the November to May period – as animal housed early face the same problem, and animal been fed rations outside face the same problem.

Commercial Poultry producers which are prevalent in Co Monaghan, seek our members assistance year-round, to keep these birds away from their flock and shed for that reason also.

Protection of flora and fauna:

The current system provides for the protection of fauna, notably the nests and young of game birds for:

- **Magpie**
- **Hooded Crow**
- **Timing: between February and September**

Approx. 18 of the Gun Clubs in our RGC release game birds, Pheasant and Mallard mostly. Magpies and Hooded Crows can have a serious impact on wild species including on game stocks

in our county. Aside from game birds, their control also benefits other ground nesting birds such as lapwing Golden Plover, Curlew, Hen Harrier). Many Gun Club members in our RGC are frequently asked to engage in the control of Magpie and Hooded Crow to prevent damage to ground-nesting birds including game birds. There are currently at least three projects in North Monaghan that have predator control central in their activity. There are the Curlew projects, Hen Harrier Project, 'CANN upland bog project. These projects could not operate without this derogation.

The allowable period of control is restricted to between February and September, during the bird breeding season up to and including the fledging period. This is too short, as it implies you can get control of these predators within 4-6 weeks in February, which is not the case. With a large reservoir of predator replacement birds ready to take the available territories, it can take 3-4 Months to arrive at a position where you are not catching any fresh birds. Mallard particularly nest early, in March, and the predator load is far too high to give them the necessary protection. With the amount of vermin, and the reservoirs waiting to take territories, and to avoid confusion for our members, this should be year-round control.

Threat to public health and vector in the spread of animal diseases:

The current system provides for the year-round control of:

- **Magpie**
- **Hooded Crow**

Gun Club members in our RGC are frequently asked to engage in the control of Magpie and Hooded Crow to prevent a threat to public health and vector in the spread of animal diseases. This often happens in cases where farmers do not want an increased risk of livestock ingesting bird faeces or contaminating agricultural products. The common problems include Hooded Crows, Jackdaw, Rooks, Pigeon, Starlings, Magpie`s and sparrows in feed sheds and around Food storage buildings, Animal Shed, including Poultry Units. In recent times with the prevalence of Avian Influenza in the wild bird population, is a particular problem for Commercial Poultry Units. All the above birds, Jackdaws, Rooks, Pigeons, Feral Pigeons, Starlings, Sparrows, should be included in the derogation under this heading. That is in addition to the birds Magpies, and Grey Crows already on the Derogation under this heading.

Yours Truly

Michael Lavelle

Co Monaghan Regional Game Council, Treasurer.