

Thursday 4<sup>th</sup> February 2021

Wildlife Licensing Unit  
National Parks and Wildlife Service  
Department of Culture, Heritage and Gaeltacht Affairs  
90 North King Street  
Dublin 7  
D07 N7CV

Dear Sir/Madam,

**Ref: Consultation on 2021-2022 Derogations**

Countryside Alliance Ireland (CAI) is an expert and informed rural campaigning organisation and we promote the countryside, country sports and the rural way of life. We are an UK and Ireland membership organisation representing over 100,000 individual members.

We reflect the views and concerns of a broad range of rural people and their livelihoods and we welcome the opportunity to provide comment on the control of certain wild bird species and the declarations as made by the Minister in exercising the powers conferred on her by Section 3 of the European Communities (Wildlife Act, 1976) (Amendment) Regulations 1986 (S.I. No. 254 of 1986).

CAI supports the current Derogation format and issuing nationwide declarations on an annual basis, as this translates into protective measures being in place to ensure a timely solution for farmers to the ongoing problem of crop protection. CAI believe there should be no change to the bird species listed on the current derogation list. However, we request that the Minister issues and publishes the updated nationwide declaration before the present one expires. This negates the occurrence of a period of uncertainty and prohibition of the control of certain wild bird species, and allows farmers to adequately protect their crops.

In light of what happened last year we must remind the Department that woodpigeons can cause €5.65 million worth of crop damage to oil seed rape alone, each year. A small scale consultation in 2014 with growers produced estimates of economic loss associated with woodpigeon crop damage ranging from €141 per hectare for oilseed rape to €282 per hectare for peas and €370-€1400 per hectare for brassicas.

It is also claimed by the RSPB that the population has increased by 1034% since 1979 showing the damage increases year on year as the population continues to rise.

The food sector is one of the key drivers of the Irish economy and such losses to produce and income to farmers who are facing unprecedented challenges at this time of national crisis cannot be afforded.

Unfortunately, pigeons will become habituated to almost anything. Gas guns, bangers and scarecrows all lose their effectiveness over time. Even one of the pigeon's ultimate enemies, the goshawk, proved ineffective.

Scientists found that while a goshawk flying overhead temporarily moved pigeons on, they rapidly returned to where they had been feeding. Only one method was identified by farmers as consistently effective in the long term — to shoot pigeons. Put simply, pigeons do not become used to being shot. As Whitby farmer ██████ put it: “Thankfully there are still shooters with the patience to sit for a few hours.



Corvids Hooded (grey) Crow, Rook, Carrion Crow Magpie, Greater and Lesser Black Back Gulls are all widespread throughout Ireland and number in their millions. All the species congregate in large numbers when a food source is available and move on as individuals or as a flock/murder to another food source when one food source has been exhausted.

Corvids and gulls also attack livestock pecking the eyes from lambs attacking sheep and cattle as they graze in the field as well as taking small song birds and their eggs.



Bird's defecating around the feed area can lead to contamination of feed in sheds and outhouses. Starlings, sparrows, magpies, rooks, hooded crows and wood pigeons will enter animal housing and feed on the total mix ration. This has a number of very serious consequences

Bird droppings contain pathogenic fungi, which contaminates the remaining feed and lead to the spread of diseases such as coccidiosis and salmonella. Coccidiosis and salmonella generally affect younger animals resulting in death or a lack of thrive of the animal. This in turn causes a negative economic effect on farms.

It is possible for a flock/murder of pigeons, corvids, starlings and sparrows to consume a tonne of feed in 10 days. Reducing available feed for livestock.



It is evident from the information above, that due to the economic threat posed to commercial crops and livestock, farmers need to control the birds throughout the year. While control of the bird is necessary throughout the year.

In addition, we strongly believe that the use of birds of prey should be included in the method of control and dispersal for all the relevant bird species in the forthcoming declarations. Using birds of prey is a valuable method for the control of certain wild bird species and has many advantages, especially in areas where the use of firearms and cage traps is not suitable. In addition, we support the declarations in respect of air safety and offer the National Parks and Wildlife Service no further comments on this issue.

If you require any additional information or should have any queries, please do not hesitate to contact me directly.

Yours Sincerely

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