Hello Niall,

Thank you for your communication dated 18/12/20. I would like to submit the following comments regarding the Control of Certain Wild Birds Species.

Pigeons are breading throughout the year including the open season period. The reintroduction of large acreage of oilseed rape is sustaining larger numbers of birds as the food source for these species is now enhanced by thousands of tons of winter and spring feed. Bird scaring devices have proved inadequate for deterring pigeons, at best they push the problem to adjoining farms.

As the population of wood pigeons appears to grow year on year, this could be associated with a number of factors, such as, less shooting due to the excessive cost of ammunition, climate change and increased supply of winter food sources, also the increase in forestation in tillage areas improving the nesting habitat for the Pigeon population.

The control of pigeons by shooting is the only proven method of controlling the population as it maintains a healthy population and protects crops from potential damage.

Damage to crops is generally caused by large numbers of Pigeons gathering in tillage areas, these birds will move quickly onto both drilled fresh seeds and standing or lodged crops.

It is important to note that pigeons will move from stubble's which are a harvested crop of grain, to a standing crop as soon as the supply of seed on the stubble is exhausted, or if adjoining fields becomes damaged by weather. Standing Crops become attractive to pigeons for numerous reasons, the variety of grain, the ripeness of the head, the moisture content, sometimes this is an effect of weather (excessive rain or a sunny period).

A stubble field or fields will quickly gather large numbers of feeding pigeons generally from mid-July to end of September, this is an opportunity to cull numbers of birds, the advantage of this is that culled birds are recovered humanly. If pigeons are left to gather in large numbers on stubble fields they will move onto adjoining crops without prior notice.

It is not possible to manage a large pigeon population by method of excessive regulation, tillage farmers in Ireland depend on the services of commercial and non-commercial pigeon shoots, who come as soon as they are contacted. Pigeons can move in flock sizes of thousands, this is not like a few deer eating grass that will recover in a few weeks, this is damage that can destroy a tillage crop in just a few days.

In Summary pigeon shooting is the only viable control method for protection against potential crop damage.

Pigeons use Stubble's (Harvested Grain Fields) to feed and gather in large concentrations, they will then attack standing crops in the surrounding areas with little or no notice. It is of vital importance that birds are controlled while on these fields, as it is one of the

most sustainable ways of controlling the wild pigeon population.

Commercial control of pigeons has existed in Ireland for over 50 years it has evolved in line with the expansion of the tillage farming industry in Ireland, it is important we recognise its function in the effective control of the wild pigeon population, if it was not for the effectiveness of this industry, many farmers would have resorted to different methods of control as with the feral pigeon, the Department would have little option but to licence the poisoning of wild pigeons.

All Regulations should be worded simply. Regulations should allow for control of the pigeons, where any potential of serious crop damage exists, persons controlling pigeon populations should have a broad range of options including shooting over harvested, seeded and standing crops. This is vital as without this option the pigeon population would be uncontrollable.

Finally if commercial pigeon shoots are over regulated and subject to unrealistic regulation, their service will be severely hampered and reduced. This reduction in control will lead to other less humane controls and will also would hugely increase the risk of widespread severe crop damage.

If you would like clarification on anything contained in this email or would like any further information, please don't hesitate to contact me.

With Regards,

Des O'Halloran. Shooting Days Youghal.