

Submission From  
Irish Country Sports Association  
to National Parks & Wildlife Dept  
on the  
2021 Control of Wild Bird Species  
Derogations.

Submitted: January 2021.

Dear Sir / Madam,

We have read the recent recommendations of the Review of the Derogation Process under Article 9(1) (a) of the Birds Directive. On the whole, the Irish Country Sports Association is happy with the content and recommendations of the report. However, we have some observations / concerns that we would like to highlight to you, and have addressed.

Last year's derogation order (2020) was signed by the minister, and with the stroke of a pen, the practice of summer Woodpigeon lethal control methods were removed. Following major objections including observations from the tillage farmers and hunting organisations this decision was overturned.

The concerns of the ICSA are as follows:

1. Proper, effective and appropriate means to avoid severe crop damage by control of protected wild birds on harvested and adjoining fields during the summer months, either in the vicinity of, or on flight lines to, vulnerable crops that have previously been at risk or have suffered severe crop damage.
  - If we take the example of our airports and cost the control methods used, then one quickly arrives at a conclusion that crop protection by these methods is unaffordable.
2. Confusing messages and lack of text regarding lethal bird control methods conducted on harvested fields which are generally in the vicinity of vulnerable crops. These locations are critical to the risk management in order to protect vulnerable crops, wording of the derogation order leaving 'grey' areas could lead to criminalisation of farmers and their agents, this is not acceptable.
3. The final NPWS derogation report focuses on the term "Recreational Hunters". The report implies that recreational hunters and recreational hunting is somehow excessive and may be disproportionate.
  - It is important to note that the majority of bird control on agricultural farms over the last fifty years was managed by recreational hunters, without whom it would not be possible to manage the threat of severe crop damage.
  - The use of "Recreational" as a term needs to be challenged, as its implications imply improper control, this is not the case. Indeed,

methods of control to date have sustainably managed a situation where bird populations have increased. Risks of severe crop damage are reduced largely by the activities of recreational hunters; this method has proven to be sustainable and is a vital resource for the agricultural industry. This resource should be validated and included as a vital part of crop protection. Without this resource who would take up this role?

- If we remove the so-called “Recreational” resource by method of restricted control on stubble areas, we expose landowners and farmers to extreme crop damage risk. This risk in our opinion is a little like Brexit, the consequences were not intended.

To expand a little on the above, and to reiterate what has previously been discussed between the ICSA and NPWS, controlling protected wild birds specifically at the location of vulnerable crops, may also cause damage to the crops when this is not necessary.

- As described previously, bird control over standing crops can further unnecessarily damage standing crops.
- It can be difficult to retrieve fallen birds from standing crops.
- Certain crops such as peas, beans and oilseed rape form seed heads that will shatter on contact with retrieving dogs or hunters retrieving birds from crops. It is not the most effective method of control.
- It is not always possible to shoot in the actual field that is at risk of severe damage for a variety of reasons, some of which are;
  - proximity to dwelling houses,
  - proximity to roads,
  - proximity to animals that could be distressed by noise (e.g. horses),
  - accessibility to the fields in question.
- The proper and effective crop control is practically conducted on stubble or harvested fields, pigeons are decoyed into a safe shooting range and efficiently dispatched.
- Wood pigeon are a very adaptable species. Traditional methods of deterrent are scare-crows, bangers and gas cannons.
  - The pigeon species quickly adapt to non-lethal control methods and will continue to severely damage crops whilst the scaring methods are in operation. The process of scaring will also simply move the problem to another area of the field or neighbouring fields.
- Another extreme measure to protect fields of grain crops, would be to simply remove all nearby sources of attraction for the pigeons, namely

the fields hedges, perimeter trees, and any nearby woods and plantations this is obviously not a sustainable method, and will do more damage to the countryside than would be gained by the habitat destruction.

ICSA members have over fifty years of professional experience in crop protection methods. In our opinion, one of the biggest threats to tillage farmers' viability is the steadily increasing populations of both pigeons and crows.

- These high pigeon and crow populations in Ireland pose a constant crop damage risk. This risk needs to be proactively managed, which means large numbers of birds in areas that pose a higher risk of severe crop damage.
- These areas need to be controlled using lethal methods, and must be allowed to be used during the summer and winter periods.
- If the main purpose of the derogation is to protect the conservation status of the Wood-pigeon, then it's important to also note that if a specific species has adapted well to its current environment and its population is favourable, then it's more than likely that the current status of the derogation complies with European regulations.
- Considering the fact that all international data indicates that the long-term stability of both wood pigeon and crow species is favourable, then it naturally follows that any proposal to use non-lethal control methods of pigeons and crows would lead to widespread crop destruction - waving hands, gas cannons, scare crows, kites, acoustic systems and flags are not sufficient to protect agricultural crops from the constant threat of severe damage.
- It is evident that NPWS recently decided to restrict lethal bird control methods during the summer months, even though this system already complies with the derogation criteria. The existing lethal methods of control have enabled the agricultural community to produce food harvest's without major fear of uneconomic return. This would not be possible under the proposed new restrictive control regulations.

The EU bird's directive states the following.

Because of their high population level, geographical distribution and reproductive rate in the Community as a whole, certain species may be hunted, which constitutes acceptable exploitation where certain limits are established and respected, as such hunting must be compatible with maintenance of the population of these species at a satisfactory level.

- After almost fifty years of sustained crop damage control in both the UK and Ireland, it is factually important to note that the European and especially Irish and UK Common Woodpigeon (*Columba Palumbus*) populations have remained favourable and in fact increased.
- These increased populations, we believe, can be attributed to a number of specific scientific circumstances, namely, changes in farming practices have increased the availability and quantity of year-round food sources.
- In recent decades there have been changes in forestry practices, with increased areas of coniferous sika spruce plantations. Now many plantations allow for increased breeding potential, and create flight line corridors to tillage lands.
- Increased European wide urbanisation of the Woodpigeon species has created high volume flight corridors. These flight corridors often lead large volumes of pigeons to vulnerable tillage farm areas. The range of these flight lines depends on the availability of food sources.
- Climate change has brought about seasonal temperature increases in winter and spring. This scientific fact combined with large increases in acreage of crops such as winter oilseed rape, spring rape, fodder rape, spring and winter planting of beans and peas is leading to increased woodpigeon populations. As agriculture starts adapting to the growing of more vegetables, this will also be beneficial to the population growth of Woodpigeon and crow species.
- Irish farmers face unique challenges in protecting of crops from the risks of severe crop damage, a high population of Woodpigeon and Crows. The circumstances of time and place under which such a threat of significant damage may occur are extremely difficult to predict.
- The methods of control used over the last 50 years have proven reasonable and have generally allowed farmers to produce crops without suffering large scale financial losses.

NPWS have stated the main reason for removing Woodpigeon from the 2020 derogation is that they have specific scientific evidence that Woodpigeon do not seriously damage crops during spring and summer periods. We now believe that this is a flawed scientific analogy.

- To date and despite numerous written requests, this professional scientific evidence is not forthcoming.
- Various stakeholders are of the opinion that this information either never existed, or is in fact non-scientific and may simply be anecdotal or even worse, spurious in nature.
- It now appears that NPWS may have promoted a scientific narrative that requires further scrutiny.
- It is not acceptable that decisions that could have enormous implications for farming and for food supplies, are made without good reason or engagement with those stakeholders who would be most affected.
- The NPWS has traditionally had little interest in habitat protection, and although it has done a reasonable job in its management of National Parks and SAC's, its complete failure over the last fifty years to deal with general year on year habitat depletion is remarkable.
- Over the last fifty years there has been little or no State political will to address the real issues of biodiversity and habitat loss.
- The main reason for bird species population decline is solely connected to habitat depletion.
- It may eventually be scientifically proven that NPWS is directly and indirectly responsible for most bird species decline due to its inadequate and non-scientific habitat protection policies.
- ICSA recommends that in future any review such as this should be conducted by a review of scientific literature and evidenced-based information.
- ICSA requests that the Department look into this in greater detail and provides the necessary evidence to support the derogation proposals to all stakeholders.
- ICSA would welcome any opportunity to discuss any proposed changes in relation to derogations under Article 9 and is willing to assist as appropriate, at any stage, including reviewing/commenting on proposed amendments to Article 9 derogations as they become available.
- It's worth noting that a number of email notices and requests by ICSA to NPWS staff have gone unanswered, in our view this indicates an unwillingness to engage with legitimate stakeholders.

ICSA agrees that Wild Bird Derogations must not impact on the conservation status of the species. This requires that scientific knowledge is available on species populations, threats and pressures to ensure that populations will not be impacted negatively by the Derogation. ICSA is of the opinion that the present control methods of bird control have proved effective in that the conservation status of pigeons and population has remained favourable.

I would be grateful if you could take all of the above points into consideration, and if you could come back to me with some dates in the next few weeks that we can arrange a meeting, that would be much appreciated.

Yours Sincerely,

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Des O'Halloran.  
National Secretary  
Irish Country Sports Association  
(Formerly Association of Game Shoot Operators AGSO)

### **Economics and control methods**

[Pigeon damage - what's the truth about it asks Shooting Times](#)

### **Population information**

[http://datazone.birdlife.org/userfiles/file/Species/erlob/summarypdfs/22690103\\_columba\\_palumbus.pdf](http://datazone.birdlife.org/userfiles/file/Species/erlob/summarypdfs/22690103_columba_palumbus.pdf)

### **Population**

[BTO BirdFacts | Woodpigeon](#)

### **Population information**

[Common Woodpigeon \(Columba palumbus\) - BirdLife species factsheet](#)

### **Population information**

<http://datazone.birdlife.org/userfiles/file/Species/BirdsInEuropeII/BiE2004Sp2452.pdf>