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Submission on behalf of Kerry Regional Game Council to the Department of Housing, Local Government and Heritage via e-mail:
WildBirdDeclarations@chg.gov.ie

Kerry Regional Game Council is made up of 39 Gun Clubs. We are affiliated to the National Association of Regional Game Councils (NARCG).

We wish to respond to this public consultation using a structural template provided to us by the NARCG.

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. Kerry. Gun Club members 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.

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 anywhere where crops are cultivated. The damage can happen at any time. It should be noted that late summer is an important period as crops can be damaged (e.g. by trampling) or consumed. At the moment several farmers are experiencing problems with pigeons on oilseed rape 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 during the lambing and calving period.

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 e.g. during the period when livestock are housed and/or fed large amounts of supplementary meal. It should be noted that serious damage to livestock feedlots can happen outside of the November – May period.

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. 50% of Gun Clubs in our RGC release game birds (peasant and/or mallard or partridge). 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 (Curlew, Partridge, Hen Harrier). Many Gun Club members in our RGC are frequently engage in the control of Magpie and Hooded Crow to prevent damage to ground-nesting birds including game birds.

The allowable period of control is restricted to between February and September, during the bird breeding season up to and including the fledging period.

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 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, Pigeon, Starlings, Magpie`s and sparrows in feed sheds and around store cattle.

Kind Regards,

Kerry Regional Game Council Secretary.

Diarmuid O' Leary.