

## Daniel O'Brien

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**From:** [REDACTED]  
**Sent:** Wednesday 13 January 2021 18:59  
**To:** WildBirdDeclarations  
**Subject:** Derogation 2021

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

National Parks and Wildlife Service  
Department of Culture, Heritage and the Gaeltacht  
90 North King Street  
Dublin 7 D07 N7CV  
Re: Wild Bird Declarations

Dear sir/madam,

I cannot write very well so i have copied a submission from a friend of mine as it suits me perfectly.

Please find my below comments and observations on the wild-birds derogation.

Firstly, I would like to address the necessity of the continuation of a year-round derogation for the shooting of woodpigeons, to prevent serious damage to arable crops. Last year the derogation initially excluded June, July & August for the protection of crops by shooting. This caused a huge amount of stress for farmers to whom I provide wildlife management services. I am aware the that a permission may be issued under section 42 of the wildlife act 1976 amended. The use of a section 42 permission is largely ineffective for the following reasons: pigeons move quickly from one farm to another decimating the crops, it is likely that serious damage will be caused before a section 42 permission can be exercised, the section 42 permission is specific to a particular farmland. As such, those protecting crops must make multiple applications as serious damage to crops is caused.

By maintaining a year-round derogation in the case of woodpigeon causing serious damage to arable crops, farmers will be empowered to protect their livelihoods and pest controllers will be better positioned to perform their duties. The use of the derogation for the woodpigeon is the most equitable solution because it ensures that woodpigeons will only be controlled to prevent "serious damage" to arable crops. Woodpigeon numbers are estimated to be at 2.8 million and the species is not of a conservation concern in Europe or Ireland so the culling of the species for the prevention of serious damage to arable crops will not affect the health of the species (NPWS, 2018, pp.33).

Secondly, I would like to outline the necessity of a year-round derogation for the control of Rooks and Jackdaws to prevent damage to livestock feedlots. Under the current derogation Rooks and Jackdaws may be shot with a rifle or shotgun from the 1st of November 2020 to the 30th of April 2021, to prevent damage to livestock feedlots (NPWS, 2020, p.3). An increasing number of my clients (farmers) are supplementing their cattle with feed from the June to October. This is because of more intensive farming practices; poor quality grazing land and poor beef prices requiring heavier animals for farmers to make a decent livelihood. Given these changes in farming practices, farmers and pest controllers require a year-round derogation for the shooting of Rooks and Jackdaws to prevent damage to livestock feedlots.

Given the above rational, I am requesting the implementation of a year-round derogation for the shooting of Jackdaws and Rooks to prevent damage to livestock feedlots.

Thirdly, I am requesting that the use of artificial decoys be permitted to aid in the shooting of Magpies, Jackdaws, Hooded Crows and Rooks. Currently the use of decoys for shooting woodpigeons, geese and ducks is permitted under the wildlife act 2000. The prevention of the

use of artificial or stuffed decoys to aid in the control of Magpies, Jackdaws, Hooded Crows and Rooks appears nonsensical. The minister may make provision for the shooting of Magpies, Jackdaws, Hooded Crows and Rooks over decoys under the “methods of control” in the birds derogation. The use of artificial decoys deceives the birds to come in closer to the pest controller. This allows the pest controller to execute a more precise shot, leading to the humane dispatch of the animal. This slight alteration to the derogation would greatly help pest controllers perform their job more effectively and humanely.

Given the above reasons I am requesting that the shooting of Magpies, Rooks, Jackdaws and Hooded crows with the aid of artificial decoys be permitted as a method of control under the birds derogation.

