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From: [REDACTED]
Sent: Sunday 17 January 2021 14:35
To: WildBirdDeclarations
Subject: The continuing control of wild birds under derogation to the wildlife act.

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To whom it may concern,

In 2020 it was stated that the department did not have enough evidence that the continuing control of certain species of birds, in particular wood pigeon to justify thier inclusion on the state wide derogation as per previous years. It was suggested by the department that wood pigeon did impact on the cereal crops enough to warrant inclusion on the derogation during the summer months.

I am aghast that a professional department could get their information so, so wrong. This would lead individuals such as farmers and hunters to believe that any information leading to this decision was gleaned via 'desk top' research and little or no effort was made to put boots on the ground to gain factual evidence. I believe that much of the information was gained from mainland European studies were of course different conditions such as farming, climate, geography and hunting styles will effect the way in which birds feed and thrive throughout the year.

Much evidence here points towards an non migratory population of pigeon in this country which stays centralised around large food sources such as farmed food crops. Winter vegetable crops are very susceptible to damage or destruction by flocking pigeons as is the early plants of the rape seed crop. As grain crops begin to ripen over the summer months they to become susceptible to bird damage as both a combination of rain and wind damage will aid birds ability to strip out the grain. As seen with other species such as corvids and ducks, birds are quite capable of flattening crops on thier own with out the aid of the weather in order to reach the grain. Crows will start along the field edges or in a tram line of a standing grain crop and systematically bend each stalk to feed off the grain. It important to remember that a field of grain that may have been flattened due to poor weather conditions is still able to be harvested but if it has had all its grain pick clean it is a wasted crop. A UK study said that six wood pigeons feeding on clover will consume in one day the same amount as a single sheep, so it is not a reasonable argument to say that birds only eat a small amount of food due to their size. Again with boots on the ground maybe some of the office bound decision makers could see what a large flock of birds look like when we count them in thier hundreds if not thousands.

Pigeons are not the only ones that present an issue to farming as mentioned before various corvids will wreck havoc on crops, not only will they attack ripening grain they will pluck the young shoots of a grain crop out of the soil to eat any invertebrates living in the soil. A flock of crows will work thier way along drill lines plucking hundreds of shoots out of the ground to discard them were they then wither. Other corvids also present a risk to young live stock such as new born lambs, while others are predators too many other bird species. At present there are no checks on the corvid population in Ireland other then the existing controlled hunting of them, they have no effective apex predators that will keep there ever increasing population balanced.

In 2020 it was suggested by the NPWS that farmers effected by crop damage due to birds should look for a Section 42 in order to deal with such issues. The whole process of applying for a section 42 is unwieldy and time consuming. By the time one would be processed the damage would be done and it is not nessacery for me to remind the department that the issues of a section 42 can not be done retrospectively, so any control done with out paperwork in hand would be illegal.

As a hunter and a person who has been involved in pigeon shooting for multitudes of crop farmers I can say that the decision of 2020 reference the derogation was ill conceived and enacted and of further restrictions are put in place will have an negative impact on farming and food production.

Regards and on behalf of fellow hunters, conservationist and farmers alike.

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