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From: [REDACTED]
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Cc: [REDACTED]
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Follow Up Flag: Follow up
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Submission on behalf of north Tipperary Regional Game Council to the Department of Housing, Local Government and Heritage via e-mail:

WildBirdDeclarations@chg.gov.ie

North Tipperary Regional Game Council is made up of 28 active 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 NARGC.

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. Tipperary. Within our region we have a couple of very important projects up and running at the minute. We have active grouse projects to try and up their numbers to a sustainable level. We have 2 potential curlew sites within our region which will especially need the derogations intact to try get numbers to a sustainable level again. And our biggest project has to be our hen harrier project that's fully active in our area. Some of our members were heavily involved in this last year and without the wild bird derogations these projects wouldn't happen. 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 happens absolutely everywhere that crops are cultivated. The damage can happen at any time from start to finish of the crops life time. The most damage is done when they are sown and before harvest. It should be noted that late summer is an important period as crops can be damaged (e.g. by trampling) or consumed. We regularly see large flocks of hundreds of pigeons attacking sown crop and standing crop within our area. At the moment several farmers are experiencing problems with pigeons on oilseed rape and our members are active on their behalf. With the year that was in it and with members less active due to lock downs and sickness etc etc. The derogations are more important this year than any other year as there will be bumper numbers of birds looking to feed because of lack of control in 2020.

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 lambing season and calving times as the birds will wait their time to clean up afterbirth and attack young newborn animals. As is well known magpies and grey crows wait for their chance to take out weak animals eyes. Only recently I got a call from a farmer for help as he had a weak cow out in the field and left for half an hour to get his dinner and wait for the vet only to come back to his cow with her eyes gone and her anus picked. The vet had no option but to put down the cow at a huge loss to the farmer

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 once the farmer has all his cattle are housed. they are normally fed with large amounts of meal. Which entices the corvids in. Crow bangers and bird scarers don't suffice in these situations. Direct intervention is needed to try keep numbers to a minimum. It should be noted that serious damage to livestock feedlots can happen outside of the November – May period in our area as we have a large number of dairy farmers in our area who are using zero grazing so the animals are housed most of the time.

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**

Every Gun Club in our RGC release pheasant, mallard and partridge in different areas throughout the region. Magpies and Hooded Crows can have a serious impact on wild species including all game stocks in our county. Aside from game birds, their control also benefits other ground nesting birds such as the hen harriers in our area, any nesting curlew, lapwing etc along with various song birds that we all enjoy watching on a summers evening or a winters day at our bird feeders. 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 and our native song 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. Our view on the season for this differs from the allowed time. We also find the winter months to be problematic too. The cold weather can weaken birds and the magpie and grey crow are quick to take advantage of this situation. Therefore we think control of these birds should be all year round.

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,

Richard Delaney

North Tipperary Regional Game Council Secretary.