

**From:** Country Sports Ireland [REDACTED]  
**Sent:** Wednesday 20 January 2021 15:15  
**To:** WildBirdDeclarations  
**Subject:** Wild Bird Declarations

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Green category

I write in response to the Department's recent announcement that it is seeking views on the operation of the annual wild bird declarations that allow landowners or their agents to control certain wild bird species where they are causing serious damage to crops, livestock, fauna or where they represent a threat to public health.

Country Sports Ireland is a leading, national representative body for shooting sports. We represent in excess of 8,000 members who are actively involved pest and predator control, often as part of game management programmes or in support of food production. We therefore have expertise and interests directly relevant to this consultation.

The control of avian pest species is essential for public and animal health, agriculture and conservation. Species such as Wood Pigeon, Feral Pigeon, Crow and Rook can cause significant damage to growing crops through consumption but also in many cases through trampling which can mean that large areas of crops not harvestable. In addition their droppings carry bacteria and viruses such as salmonella and E. coli which are a threat to human health and also the welfare of farm animals that consume feed stuffs infected with their faeces. In this context the ability to control pigeons and crows during the months when crops are most susceptible to damage is absolutely essential in terms of the viability of crop production but also in terms of animal welfare through disease prevention. Given the particularly challenging climate and uncertainty around food security caused by factors such as the ongoing global Covid-19 pandemic and Brexit we believe it has never been more important to support local food production and the ability to control damage to, or of contamination of crops caused by avian pest species is a central part of this support.

Species such as Hooded Crow and Magpie are also significant predators of the eggs and young of game birds and ground nesting birds. The majority of these species do not enjoy favourable conservation status and are in decline. The key reasons for the ongoing decline in the abundance of ground nesting birds and wader species in particular, is habitat loss and high levels of predation. Given this situation, Country Sports Ireland believes that it would be inconceivable to remove the ability for conservationists and game managers to protect vulnerable species from predation particularly during the spring and early summer months which is when reproduction takes place.

The Department will also be aware that last year the Minister had signed into law regulations that effectively prohibited control of wood pigeons during the months of June, July and August. There was substantial opposition to this action from farmers and landowners, for many of the reason I have outlined above and ultimately the Minister decided to reverse this decision. The reasons for opposition to the Minister's plans remain valid and I would suggest should be taken into account when considering this year's annual wild bird declarations. There are good reasons why there is provision in law to permit derogation from the terms of the EU Birds Directive enabling the control of certain avian pest species on a year-round basis. These reasons are no less valid today than they have been at any other time.

We would ask that the Department acknowledges receipt of this correspondence and look forward to being kept

informed of the outcome of the consultation proves. Should you require any further information please feel free to come back to us and we would be happy to oblige.

Ronan

Ronan Gorman  
Chief Executive



w; [www.countrysportsireland.org](http://www.countrysportsireland.org)