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**Sent:** Thursday 10 March 2022 13:29  
**To:** Housing WildBirdDeclarations  
**Subject:** Wild Birds Declaration Submission.  
**Attachments:** Submission on the review of the derogations under the bird.docx

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A Chara,

Please find attached a word document with my submission relating to the Wild Birds Declaration as requested.

Mise le meas,

**Submission on the review of the derogations under the bird's directive, on behalf of Co Monaghan Regional Game Council to the Department of Housing, Local Government and Heritage via**

**e-mail: [WildBirdDeclarations@chg.gov.ie](mailto:WildBirdDeclarations@chg.gov.ie)**

Co Monaghan Regional Game Council is made up of 26 Gun Clubs with approximately 600 members.

We are affiliated to the National Association of Regional Game Councils (NARGC).

**General:**

The declarations to control certain wild bird species are important for Gun Clubs and their members in our Regional Game Council (RGC).

The work carried out by Gun Clubs and their members in our RGC plays an important socio-economic and conservation role in Co. Monaghan. Co Monaghan RGC in association with the local gun clubs, are involved in the management of Sliabh Beagh upland bog.

This work involves the control of predatory birds, which can only be done if the derogations are

in place. This conservation work has benefited many vulnerable at risk species, making it a good

example of how effective management and targeted predator/vermin control can have a beneficial impact for at risk species and bio diversity. Our work on Sliabh Beagh has had a very positive impact, protecting many vulnerable species e.g. Hen Harrier, Grouse, Lapwing, Curlew, Golden Plover, Meadow Pipets, Cuckoo etc. Our work has benefited many more upland birds and bio diversity in the area.

Gun Club members also work closely with farmers and landowners to prevent serious

damage caused by pest birds.

Effective management of pest birds within the existing legislation can on occasion

present challenges to members working on the ground, hence it is important to have a derogation system

which is simple, transparent and which can be applied by individuals undertaking bird pest control in the following areas:

- 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.

**A 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 challenges encountered by Gun Club members and/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. These pest species are intelligent and know their environment, and a

repetitive noise or a stationary object is quickly loses its effectiveness as a deterrent.

**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 at any time but

particularly after

sowing, initial germination, or just prior to harvesting. It should be noted that late summer is an

important period as crops can be damaged (e.g., by trampling) and or consuming grain, or

vegetables. In addition to damage in Grain crops some farmers are experiencing problems with pigeons in other crops e.g, oilseed rape, brassicas , and are requesting assistance from our members.

Bearing in mind the current threat to global grain supplies arising from the Russian invasion in the Ukraine, the protection of essential grain and other food crops is of even greater importance.

**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 in the springtime, during the lambing and calving season. In particular Grey Crow and Magpie targeting sheep/lambs . Heavily pregnant ewes occasionally get stuck on their

back when they are not able to roll either way to get back on their feet. Grey Crows and Magpies

will remove the eyes from the Ewe, pierce her body with their beaks, while the Ewe is still

alive. Where the Ewe survives the initial attack , it is usually put down, as it is unlikely to survive the resulting infections. The young of all domestic animals are prime targets , with new born lambs a particular target for both Corvids. If an attack by Grey Crow pierce the skin of any domestic animal, the resulting infection, is generally fatal to the domestic animal.

**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 to stop those birds consuming and soiling food. These birds by this soiling can pass on several serious diseases to both sheep and cattle, it should be noted that serious damage to livestock feedlots can happen outside of the November to May period – as animals housed early face the same problem, where supplemental rations are fed to animals outside, there is a similar risk.

Commercial Poultry producers, of which there are a significant number in Co Monaghan, routinely seek assistance from our members throughout the year, to keep these birds away from their flocks and buildings to reduce damage to feed and the risk of disease spread by these pest species.

**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**

The vast majority of the Gun Clubs in our RGC release game birds, mainly Pheasant and Mallard.

Magpies and Hooded Crows have a serious impact on wild species including released game stocks in our county. Aside from game birds, their control also benefits other ground nesting birds e.g. Lapwing, Golden Plover, Curlew, Red Grouse, Hen Harrier etc.

Many Gun Club members in our RGC are frequently asked to engage in the control of Magpie and Hooded Crow to prevent damage to ground–nesting birds, including game birds. There are currently at least three projects in North Monaghan that have the control of predator species as a central part of their management activities.

They include the Curlew , Hen Harrier and ‘CANN upland bog projects, which could not operate without this derogation.

The allowable period of control is restricted to between February and September, during the bird

breeding season up to and including the fledging period. This period of control is too short, as it implies that the effective control of these predators can be achieved within February/September, which may not be the case. With a large reservoir of predator replacement birds ready to take the available territories, ideally we would like to have the option to manage the pest species throughout the year to arrive at a position where the threat has been reduced to an acceptable level.

As the impact of climate change affect weather patterns the nesting periods of many species appear to be starting earlier in the year, Mallard in particular are nesting earlier late February or early March, and the predator population is far too high to give them the necessary protection.

With the amount of pest species, and the reservoirs of pest species waiting to take territories, it is essential that our members are in a position to exercise year-round management/control of pest species.

**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 asked to engage in the control of Magpie and

Hooded Crow to prevent a threat to public health and vectors which spread of animal diseases.

This often happens in cases where farmers do not want an increased risk of livestock ingesting

bird faeces or the contamination of agricultural or food storage/production areas.

This risk of contamination from Hooded Crow, Jackdaw, Rook, Pigeon, Starling, Magpie and Sparrow is significant in feed sheds, Food storage buildings, Animal Sheds, including Poultry Units. In recent times with the prevalence of Avian Influenza in the wild bird population, the risk to Commercial Poultry Units has increased with a number of outbreaks in Co.Monaghan and and other counties.

All the above birds, Jackdaws, Rooks, Pigeons, Feral Pigeons, Starlings, Sparrows, should be

included in the derogation under this heading. That is in addition to Magpie and Grey Crow which are already included in the Derogation under this heading.

Yours Truly

[Redacted]

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Co.Monaghan Regional Game Council.