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**Sent:** Monday 14 March 2022 11:57  
**To:** Housing WildBirdDeclarations  
**Cc:** [REDACTED]  
**Subject:** Re: Wild Birds Declaration 2022/2023 Consultation  
**Attachments:** ICSA Derogation Submission 2022.docx

**Importance:** High

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

[REDACTED]

Hello,

Please find attached the submission from Irish Country Sports Association. I would be grateful if you could acknowledge receipt of same please.

With Regards,

[REDACTED]  
[REDACTED] Irish Country Sports Association (ICSA)  
(Formerly Association of Game Shoot Operators AGSO)

[REDACTED]

----- Original Message-----

**From:** "Housing WildBirdDeclarations" <WildBirdDeclarations@housing.gov.ie>  
**Sent:** Monday, 21 February, 2022 14:35:02  
**Subject:** Wild Birds Declaration 2022/2023 Consultation

All Stakeholders

Please note that the Department of Housing, Local Government & Heritage is today launching a public consultation process on the Wild Bird Declaration 2022-2023.

The Consultation Notice can be found here<<https://www.npws.ie/legislation/eu-directives/birds-directive/public-consultation-wild-birds-declaration-2022-2023>>.

Any comments/proposals you may wish to make should be submitted to the Department of Housing, Local Government and Heritage by 17:00 on Monday 14 March 2022.

A press release in relation to same will issue from the Department later this afternoon.

Regards

Wildlife Licencing Unit  
National Parks & Wildlife Service

Submission From  
Irish Country Sports Association  
to National Parks & Wildlife Dept  
on the  
2022 Control of Wild Bird Species  
Derogations.

Submitted: March 2022.

The following is a submission from Irish Country Sports Association.

The following is a recent press release from the Minister for Agriculture Food and Marine Charlie McConalogue.

<https://www.gov.ie/en/press-release/5b6d3-mcconalogue-emphasises-need-for-eu-solidarity-in-dealing-with-the-agri-food-impacts-of-the-russian-invasion-of-ukraine/>

The press release gives a sense of the importance of the National Grain Harvest. Many informed agricultural commentators are of the opinion that it will not be possible to greatly increase this year's national grain harvest. In fact it will also be difficult to increase the harvested tonnage of a grain sector that has struggled with commercial sustainability particularly over recent years.

Tillage crop risk management of the Irish tillage industry is an essential part of national food security and this has been highlighted by the recent humanitarian crisis in the Ukraine.

**Typical weather damaged crop that is now extremely vulnerable to severe bird damage.**



The importance of maintaining a reliable annual grain harvest and the request that all farmers play a part in increasing the amount of tillage areas available to plant new crops is a timely realisation of the food security issues that challenge that has recently emerged.

It's important to recognise that the threat of serious crop damage in certain parts of Ireland are elevated compared to other European countries - this threat is directly connected to larger than average populations of both pigeons and crows. This is a scientific consideration that needs to be addressed with our European partners, the original wild bird directive was designed around specific bird species protection, it needs to reflect the constant elevated crop damage threat situation in Ireland.

It's vitally important to maintain a system of Proper, effective and appropriate bird damage controls in order to avoid severe crop damage. Control of pigeons and crows on harvested and adjoining fields during the twelve-month period of the growing session is essential . The control methods need to be deployed either in the vicinity of, or on flight lines to, vulnerable crops especially crop areas that have previously proven to be at risk or have suffered severe crop damage in previous seasons.

#### **Pigeon Damaged Broccoli Plant.**



The cost of providing crop protection for tillage farmers needs to be considered, if we calculate the costs of bird control at our national airports both military and civilian, the enormous costs for the professional services of bird control specialists the use of mainly non-lethal, scare methods, these control methods are not a realistic economic option for protection of crops in the agricultural environment.

National interpretation of the wild bird directive is leading to confused messages especially regarding the use of lethal bird control methods. The control of both pigeons and crows over harvested crops which are generally in the general vicinity of other vulnerable crops needs to have no ambiguity.

Control of excessive pigeon and crow populations in areas of harvested crop locations is critical to the risk management of adjoining vulnerable crops. Wording of the control methods in the wild bird derogation order that is deliberately leaving 'grey' areas has already given rise to unsuccessful attempts at criminal actions against agents of tillage farmers, this is no longer acceptable and needs to be rectified in order to ensure adequate crop protection methods are not unnecessarily interrupted.

The majority of bird control on agricultural farms over the last 30 years is managed by recreational hunters, this resource is vital in order to maintain an affordable method of crop damage control. Without recreational hunters it would not be possible to manage the threat of severe crop damage.

The use of the term "Recreational Hunter" as mentioned in previous submissions by officials of NPWS has connotations implying some improper control or some level of satisfaction that is in some way improper. It appears to the ICSA that a certain level of vexatiousness now exists within the department and that an ideology of conservation that excludes proper scientific scrutiny is now an acceptable part of the decision-making process.

To expand a little on the above, and to reiterate what has previously been discussed between the ICSA and NPWS, controlling protected wild birds specifically at the location of vulnerable crops, may also cause damage to the crops when this is not necessary.

- As described previously, bird control over standing crops can further unnecessarily damage standing crops although it is often necessary to shoot directly over damaged crops.
- It can be difficult to retrieve game from standing crops, sometimes leading to wounded birds not being immediately dispatched.
- Certain crops such as ripe peas, beans and oilseed rape have fragile seed heads which will shatter and lose seeds on contact with retrieving from standing crops. It is not always the most effective method of crop protection.
- It is not always possible to control crop damage in the actual field that is at risk of severe damage for the following reasons.
  - proximity to dwelling houses,
  - proximity to roads,
  - proximity to animals that could be distressed by noise (e.g., horses),
  - accessibility to the fields in question.
  -
- Proper and effective crop control is often conducted on harvested fields; pigeons are decoyed into a safe shooting range and efficiently dispatched.

- Wood Pigeons and Crows are a very adaptable species. Traditional methods of deterrent that are scare-crows, kites and gas cannons. Pigeons and crows quickly adapt to non-lethal control methods and will generally continue to severely damage crops.

ICSA members have more than fifty years of professional experience in crop protection methods. In our opinion, one of the biggest threats to tillage farmers' viability is the steadily increasing populations of both pigeons and crows.

- These high pigeon and crow populations in Ireland pose a constant crop damage risk.
- This risk needs to be proactively managed, which means the management of large numbers of pigeons and crows in areas that pose a higher risk of severe crop damage.
- These areas need to be controlled using lethal methods, and control methods are required during the summer and winter periods.
- The purpose of the derogation is to protect the conservation status of both Wood-pigeon and crow populations if this is the intention of the wild Bird derogation then it's important to recognise that if a specific species has adapted well to its current environment and its population is favourable, then it's more than likely that the current status of the derogation complies with European regulations.

The EU bird's directive states the following:

Because of their high population level, geographical distribution and reproductive rate in the Community as a whole, certain species may be hunted, which constitutes acceptable exploitation where certain limits are established and respected, as such hunting must be compatible with maintenance of the population of these species at a satisfactory level.

- After almost fifty years of sustained crop damage protection in Ireland, it is factually important to note that the European and especially Irish Common Woodpigeon (*Columba Palumbus*) and Crow populations have remained favourable and in fact the population appears to have increased.
- These increased populations, we believe, can be attributed to a number of specific scientific circumstances, namely, changes in farming practices have increased the variety and availability of year-round food sources.
- In recent decades there have been changes in forestry practices, with increased areas of coniferous sika spruce plantations. New forestry plantations allow for increased breeding potential, and create larger flight line corridors to tillage lands.
- Increased European wide urbanisation of the Woodpigeon species has created high volume flight corridors. These flight corridors often lead large volumes of pigeons to vulnerable tillage farm areas. The range of these flight lines depends on the availability of food sources.
- Climate change has brought about seasonal temperature increases in winter and spring. This scientific fact combined with greater variety of tillage crops such as winter oilseed rape, spring rape, fodder rape, spring and winter planting of beans and peas and vegetables is leading to increased woodpigeon populations. As agriculture starts adapting to the growing of more varieties of crops, this will also be beneficial to the population growth of Woodpigeon and Crow species.
- Irish farmers face unique challenges in protection of crops, the risks of severe crop damage, a high population of Woodpigeon and Crows. The circumstances of

intermittent crop damage may occur and are extremely difficult to if not impossible to predict.

- The method of lethal controls as practiced over the last 50 years by farmers and recreational hunters have proven to be sustainable and have generally allowed farmers to produce tillage crops without suffering large scale financial losses due to crop damage.

NPWS officials have stated the main reason for the previous removal of the Woodpigeon from the 2020 derogation was that they had received specific scientific evidence that Woodpigeon do not seriously damage crops during spring and summer periods. ICSA are of the opinion that this action was informed by incorrect information some of which were submitted by NPWS officials.

- Various stakeholders are now of the opinion that the scientific information NPWS officials claimed to have received and was promoted as the reason for alteration of the 2020 wild bird derogation may be anecdotal or spurious in nature.
- It the opinion of the ICSA that NPWS may have promoted a scientific narrative that was factually incorrect.
- Decisions made by ministers of the department that have enormous implications for farming and for food security, should not be made without proper engagement with those stakeholders such as the IFA.
- ICSA would welcome any opportunity to discuss derogations under Article 9 and is willing to assist as appropriate, at any stage, including reviewing/commenting on proposed amendments to Article 9 derogations as they become available.
- ICSA is of the opinion that the present control methods used to reduce the threat of severe crop damage, have proved effective in that the conservation status of pigeon and crow population has remained favourable.

I would be grateful if you could take all of the above points into consideration, and if you could come back to me with some dates in the next few weeks that we can arrange a meeting, that would be much appreciated.

Yours Sincerely,



Irish Country Sports Association  
(Formerly Association of Game Shoot Operators AGSO)



### **“Crop Damage” on Vimeo:**

<https://vimeo.com/687712029?ref=em-share>

This is a typical pigeon attack on a crop of standing wheat, in County Kildare, in the middle of August. The crop was unfortunately badly damaged before effective crop control was established.

### **Economics and control methods**

[Pigeon damage- what's the truth about it asks Shooting Times](#)

### **Population information**

[http://datazone.birdlife.org/userfiles/file/Species/erlob/summarypdfs/22690103\\_columba\\_palumbus.pdf](http://datazone.birdlife.org/userfiles/file/Species/erlob/summarypdfs/22690103_columba_palumbus.pdf)

### **Population information**

[BTO BirdFacts |Woodpigeon](#)

### **Population information**

[Common Woodpigeon \(Columba palumbus\) - BirdLife species factsheet](#)

### **Population information**

<http://datazone.birdlife.org/userfiles/file/Species/BirdsInEuropeII/BiE2004Sp2452.pdf>