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To: Housing WildBirdDeclarations
Subject: Bird derogation 2022/2023
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Follow Up Flag: Follow up
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To whom it may concern,
Attached is our submission for the coming years bird derogation
Hopefully all is satisfactory
Kind regards

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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 with members from all parishes in north Tipperary. We are like minded people all joined together by our one love for conservation . This is the reason we are so interested in keeping the derogations as they impact what we do with such severity. We are affiliated to the National Association of Regional Game Councils (NARCG).

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, partridge projects, duck breeding 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 would never happen. Gun Club members work closely with farmers and landowners to prevent serious damage caused by pest birds. In reality there is going to be little difference from last years submission as the same problems persist and have not changed. We are ultimately into conservation and for true conservation to happen we need pest species and invasive species numbers kept to a minimum.

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 and 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. This year is an important year for the derogations as the numbers of crows and pigeons have boomed because of lack of control during the previous 2 years due to covid. This year is especially important also because of the need for farmers to grow grain as they are predicting a shortage due to war in eastern Europe.

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. I have often come across a sheep which unavoidably ends up on their back and ends up being attacked by these birds and the results are devastating to the farmer who is already stretched to their limit with the growing prices they have to pay to keep their flock!!! This is the harsh reality to the need to keep their numbers in check.

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. Also as gun clubs into conservation we tend to rear game birds in big numbers and if something could be included to keep numbers down around our release pens and rearing pens this would be great as the derogation specifically states live stock feedlots and our members would like clarity or a definition that includes our pens and our type of live stock.

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. As we all know and is broadly recognised wading birds are in serious decline mostly to habitat destruction but secondly because of predation from vermin. The biggest culprit is the hooded crow and magpie as they don't give them a chance to fledge because they will raid the nest and steal the eggs. It's hard enough for them to try fledge without this extra pressure!!!!

The allowable period of control is restricted to between February and September, during the bird breeding season up to and including the fledging period. We feel this would be better if it was year round as birds and animals go through harsh times outside these months. What with the weather varying from year to year we feel it better to extend it. We

have had serious flooding ,freezing dry spells etc etc. These weather events make it harder for birds and animals to survive and easier for vermin to take advantage.

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 engaged 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,



North Tipperary Regional Game Council

