

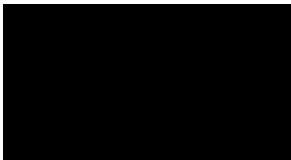


**Submission Re: S.I. No. 254/1986 - European Communities (Wildlife Act,  
1976) (Amendment) Regulations, 1986.  
Control of Certain Wild Bird Species**

**14<sup>th</sup> March 2022**

**Submission by:**

**Irish Farmers' Association**



## Introduction

The Irish Farmers' Association is the largest national representative organisation in the country, with over 72,000 members. We represent farmers in all sectors through our democratic structure of 29 County Executives and our ruling body the National Council, on which each county and each commodity is represented. IFA represents farmers with Government, agri-business and retailers. Through our Brussels office and affiliation with COPA-COGECA, we maintain a full-time presence at EU level on behalf of Irish farmers.

IFA welcomes the opportunity to present a submission re: Section 3 of the European Communities (Wildlife Act, 1976) (Amendment) Regulations 1986 (S.I. No. 254 of 1986). This submission has a direct relevance for Livestock, Cereal and Vegetable producers; however, it is also of indirect concern to all our members and the rural economy in general.

IFA Countryside is a section of the organisation which represents individuals and clubs who live or have an interest in the countryside.

The Irish Tillage sector has a farm gate value of €500 million with an estimated 9,700 farmers involved in some type of tillage enterprise. Apart from its economic value, the sector underpins Ireland's export-orientated livestock, dairy, mushroom and drinks sectors. In relation to climate change and the environment, the sector has the lowest carbon footprint of the main farming sectors.

The Irish Horticulture sector has a farm gate value of €437 million. It employs an estimated 6,600 while a further 11,000 are employed in downstream businesses. Of the total €437 million, the field vegetable sector is a significant sub sector with a farm gate value of €78 million. In recognition of the trend towards plant-based diets, the Report from the Oireachtas Joint Committee on climate action has recommended expanding the Irish Horticulture sector, to avail of opportunities for import substitution and farm diversification.

There are 34,000 sheep farmers with 2.62 million ewes in Ireland. Sheep farming is the second largest sector in terms of farm numbers. The sector has an output of €450m with exports of 55,000t to 35 different countries.

There are 7m cattle in Ireland on 113,000 dairy, beef and suckler farms. The combined export value of the dairy, beef and sheep sector is almost €8bn to the Irish economy.

## **Executive Summary**

Due to the economic threat hooded crows, magpies, rooks, jackdaws, starlings, sparrows, wood pigeons, greater blacked backed gulls, lesser blacked backed gulls pose to commercial crops and livestock, farmers need to control these birds throughout the year. While control of the birds is necessary throughout the year, it is quite obvious that the damage caused by pigeons and rooks is very critical throughout the months of June, July August in particular. The damage caused by magpies, hooded crows, greater blacked backed gulls, lesser blacked backed gulls to livestock is very critical throughout the months of December, January, February, March and April.

In addition, we want to emphasise that farmers only need to control the birds over standing crops and that it is for the prevention of excessive economic crop damage to the plants and not for any recreational reasons.

Bird attacks directly on livestock can have devastating physical effects as this submission demonstrates. Irish farmers are legally responsible for the health and welfare of the animals under their care.

In conclusion, it is imperative the tools necessary for farmers to protect the health and welfare of their animals and the production levels on their farms continue to be available. This includes the control of certain wild bird species.

## **Section 3 of the European Communities (Wildlife Act, 1976) (Amendment) Regulations 1986 (S.I. No. 254 of 1986).**

### **Control of Certain Wild Bird Species**

The current declarations made by the Minister for Culture, Heritage and the Gaeltacht allowing for the control of certain wild bird species are due to expire on 30 April 2022. These declarations were made by the Minister in exercising powers conferred under Section 3 of the European Communities (Wildlife Act, 1976) (Amendment) Regulations 1986 (S.I. No. 254 of 1986).

The effects of the declarations are to allow the control of certain wild bird species by landowners or their agents where these species are causing serious damage to crops, livestock, fauna or where they represent a threat to public health, throughout the State.

### **Hooded Crow/Rook/Magpie/Jackal Carrion**

#### **Hooded (Grey) Crow**

A widespread and common breeding species in most habitats in Ireland. Its population in Ireland has been estimated at 590,000 individuals. Can often be found in murders of 30 plus. The head, throat and breast are black, as are the wings and tail. The rest of the body can appear either a rather cold grey or buffish grey-brown depending on the light. Their length varies from 48 to 52cm with a wingspan of 105cm and weight is on average 510g. Hooded crows are omnivores and will eat practically anything. Their bill is 3 to 5 cm. The grey crow feeds in a variety of situations including pastures and cereals in farmland.

#### **Rook**

A widespread and common breeding species in most habitats in Ireland. Population estimated at 4.7 million individuals. Similar in size to that of a hooded crow, the rook is all black and in certain lights can show a reddish or purple sheen to its plumage. Told apart from other species of crow by its 'trousers' the drooping feathers on its belly and the bare skin around its bill base on the adult birds. The Rook is extremely widespread and abundant in Ireland breeding in all areas. Feeds in a variety of situations including pastures and cereals in farmland.

#### **Carrion Crow**

The all-black carrion crow. Similar in size to that of a hooded crow. They are fairly solitary, usually found alone or in pairs, although they may form occasional flocks. Mainly found in North-West Ireland. Feeds in a variety of situations including pastures and cereals in farmland.

#### **Magpie**

A widespread and common breeding species in most habitats in Ireland. Population estimated at 740,000 individuals in Ireland. The head, chest, back and tail are black; the belly and flanks are white. Their length is 44–46 cm, wingspan is 52–62 cm, weigh 210–272 g. The magpie's diet is but not contained to invertebrates, fruits, seeds, small vertebrates and carrion. Feeds in a variety of situations including pastures and cereals in farmland.

#### **Lesser Black Backed Gull**

Widespread along the Western sea coast, Eastern sea coast of Dublin and Wicklow in particular. Its population is estimated at 10,000 individuals. A large gull, which in adult plumage has dark grey upper wings, showing black tips with white 'mirrors' (white at the very tips surrounded by black); the rest of the plumage is white. Length 52-64 cm, wingspan 135-150 weight 545-1000g. Feeds in a wide variety of situations including fish from the sea, waste from fisheries, rubbish from landfill sites, insects in flight, young birds and food from other birds.

### **Greater Blacked Backed Gull**

Widespread along all of the Irish coastline. Its population is estimated at 5,000 individuals. A large gull and the largest widespread gull to be seen in Ireland. In adult plumage has blackish upper wings showing a broad white margin and darker wing tips showing white 'mirrors' the rest of the plumage is white. Length 71-79cm, wingspan 146-160cm, weight 1300 -2000g. Feeds in a wide variety of situations fish from the sea, waste from fisheries, rubbish from landfill sites, insects in flight, young birds and food from other birds.

### **Threat to Livestock**

The above birds are all widespread throughout Ireland and number in their millions. All the species congregate in large numbers when a food source is available and move on as individuals or as a flock/murder to another food source when one food source has been exhausted.

Ewes and lambs are particularly vulnerable to attack during the lambing season. Lambing season starts in December for early lowland flocks and finishes in May for upland flocks. The majority of early lambing flocks lamb indoors. Hooded crows and rooks will enter lambing sheds to feed on new born lambs. However, the vast majority of attacks happen outdoors when ewes are in the process of lambing or giving birth. Predation happens when an ewe is unable to defend itself from birds when lambing.

Corvids and gulls attack the eyes, tongue and naval cord of new born lambs which leads to a slow painful death of the lamb.



In early summer, ewes can often roll onto their back unable to right themselves due to their winter fleece. When an ewe is on its back, it is unable to defend itself against attack. With the soft flesh of its belly and eyes exposed, corvids and gulls will feed on its eyes and soft under belly. Unfortunately, no sheep farmer has been spared



the carnage of a corvid or gull attack on their flock. This also has a devastating effect on ewes who may be unable to nurse their lambs and lambs who are unable to nurse their mothers.



Grey crows and Magpies also attacked cattle, causing horrific injuries to effected animal. Below puncture wounds are clearly visible on a animals tail which was targeted by corvids.



### **Jackdaw**

A widespread and common breeding species in most habitats in Ireland. Its population has been estimated at 3 million individuals The Jackdaw is a small all-dark, grey crow with a lighter nape and neck side which contrasts

with a blackish forehead. It has a uniform grey under wing, black legs and a lighter bill. Jackdaws are omnivorous, often recorded feeding on grassland invertebrates and are also prevalent around farmyards where they avail of any spilt grain and other livestock food that is available.

### **Wood Pigeon**

A widespread and common breeding species in all habitats in Ireland. It is estimated that there are 2.8 million individual wood pigeons distributed throughout Ireland. An adult wood pigeon can weigh up to 500g. Wood pigeons are largely sedentary, travelling no more than 10km between feeding and roosting sites. They have a wide and varied diet; cereal grains, clover, vegetables, rape seeds, peas etc. It has very few natural predators, mainly the peregrine and sparrow hawk. The wood pigeon is the most serious avian agricultural pest.

### **Wood Pigeons and Corvids in the Tillage sector**

In summer wood pigeons and corvids will form large feeding flocks. These flocks can number in their hundreds. Damage to crops would normally start in February, when stubble and other food sources have been exhausted. This damage will continue into the summer when the grains appear on the plants and continue right through into the Autumn, until harvesting is over and an abundance of stubble is available. In the early growing season; February to March, this damage can result in reduced growth, late harvest, weight loss of the crop, and damage to leaves often making the damaged crop unsaleable.

In most circumstances, crop damage from wood pigeons and corvids will occur at either the early stages of growing or near harvesting (June, July, August), but peas in particular are targeted by wood pigeons throughout the growing season. In June, peas will be coming into flower and these, together with immature pods are particularly vulnerable to attack from wood pigeons.

If a cereal crop becomes lodged, large flocks will gather grazing outwards from the lodged areas, distorting non-lodged upright shafts of cereal crops, making them harder to harvest. The only effective way to control wood pigeons and corvids is by lethal means.

Wood pigeons, and corvids become used to non-lethal deterrents such as scarecrows and gas bangers which lose their effectiveness over time. Shooting wood pigeons and corvids whilst they are attacking crops is the most effective means of controlling them.



### **Wood Pigeon and Corvid Damage in the Field Vegetable Sector**



Of the crops in the field vegetable sector, the Brassica crops tend to be the most vulnerable to wood pigeon and corvid damage, however, they are known to feed on other crops such as lettuces etc. Many of the brassica crops including cauliflower and the cabbages, are grown all year round and therefore pigeon damage can occur at any stage during the year. The broccoli crop is usually ready to harvest from late May/early June onwards and at this stage the crop is very vulnerable as the pigeons have fewer crop choices at this time. The harm caused by the bird tends to be yield related in the cereal sector, however, in field vegetable crops the damage caused to the visual appearance of the crop is another major concern. In addition to the yield and visual effects, there can be a human health risk due to faecal contamination from the birds on crops.

As is the case with the tillage crops, gas bangers and other control methods have only limited effectiveness on their own, but work best when combined in a control strategy which includes shooting.

When a farmer detects the problem in the crop the situation must be dealt with immediately, otherwise more birds will flock to the crop and the damage will escalate in a very short period of time. In fact, if the birds are controlled straight away this will negate the need to shoot large numbers that will gather.

## **Extension of the Derogation to**

### **Starlings**

A widespread and common breeding species in most habitats in Ireland. Population estimated at 2.8m individuals. Flock sizes of 20,000 plus commonly recorded. Adults are dark brown. The legs are dull pink at all times. In summer plumage has a glossy all-dark plumage with a green and purple sheen and the bill is yellow.

### **Sparrows**

Sparrows are resident and very widespread in Ireland. Population estimated at 2.5m individuals. Large head and bill. Dark brown upperparts with heavy dark streaking, grey underparts. Diet consists of seeds, spilt grain, buds and insects.

### **Birds defecating**

Birds defecating around the feed area can lead to contamination of feed in sheds and outhouses. Starlings, sparrows, magpies, rooks, hooded crows and wood pigeons will enter animal housing and feed on the total mix ration. This has a number of very serious consequences for a farmer:

- (a) **Reduction of available feed for livestock.** It is possible for a flock/murder of pigeons, corvids, starlings and sparrows to consume a tonne of feed in 10 days. In certain parts of Ireland animals can be housed from September to April.
- (b) The reduction in feed can lead to a live weight gain loss to the animals which in turn costs the farmers more, not only to replace the feed but also the body weight condition of the animals.
- (c) Bird droppings contain pathogenic fungi, which contaminates the remaining feed and lead to the spread of diseases such as coccidiosis and salmonella. Coccidiosis and salmonella generally affect younger animals resulting in death or a lack of thrive of the animal. This in turn causes a negative economic effect on farms.





## Conclusion

It is evident from the information above, that due to the economic threat hooded crows, magpies, rooks, jackdaws, starlings, sparrows, wood pigeons, greater blacked backed gulls, lesser blacked backed gulls pose to commercial crops and livestock, farmers need to control the birds throughout the year. While control of the bird is necessary throughout the year, it is quite obvious that the damage caused by pigeons and rooks is very critical throughout the months of June, July August in particular.

The damage caused by magpies, hooded crows, greater blacked backed gulls, lesser blacked backed gulls to livestock is very critical throughout the months of December, January, February, March and April.

In addition, we want to emphasise that farmers only need to control the birds over standing crops and that it is for the prevention of excessive economic crop damage to the plants and not for any recreational reasons.

The tillage sector has already seen a decline of 20% in planted area since 2008. Farmers continue to face challenges in relation to cheap imports, loss of plant protection crops, weather etc. so, they cannot afford the imposition of further regulations which undermine their financial sustainability. The vegetable sector has seen a decline of 22% in the number of vegetable growers since 2014 due to similar issues in the tillage area and additional issues such as below costs selling by retailers.

Irish cattle and sheep farmers are legally responsible for the health and welfare of the animals under their care. This is a responsibility farmer's take very seriously and regularly invest significant resources and finances in excess of the commercial value of the animal to return it to full health. The livestock and sheep sectors in Ireland are primarily small-scale family farm units operating off very low income. It is imperative the tools necessary for farmers to protect the health and welfare of their animals and the production levels on their farms continue to be available. This includes the control of certain wild bird species.

In most instances, it is a farmer or their agent who is typically a member of a local gun club, who will carry out the control of birds on a farmers' land.

[Redacted]

**From:** [Redacted]  
**Sent:** Monday 14 March 2022 14:37  
**To:** Housing WildBirdDeclarations  
**Subject:** Wild Bird Declaration 22-23  
**Attachments:** IFA Submission \_Control of Certain Wild Bird Species 2022 (1).pdf  
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Afternoon,  
Please see attached submission to the Public consultation for the Wild Bird Declaration 22-23.

Kind Regards

[Redacted Signature]

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