

Submission From  
Irish Country Sports Association  
to National Parks & Wildlife Dept

on the

2023 / 24 Control of Wild Bird Species  
Derogations.

Submitted: February 2023

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.

[Irish Examiner Crop diversification rules lifted for 2023 The derogation for 2023 is to support food security, with growers to be encouraged to cultivate crops for food production..16 Aug 2022](#)

The press release gives a sense of the importance of the National Grain Harvest.

Tillage crop risk management of the Irish tillage industry is an essential part of national food security this has been highlighted by the recent 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 emerged from the Ukrainian crisis.

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 crow species. 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, this derogation needs to reflect the constant elevated crop damage threat situation that exists in Ireland.

It's vitally important to maintain a system of proper, effective and appropriate crop damage controls. Control of pigeons and crow species on harvested and adjoining crops during the twelve-month period of the is essential. 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 should have no ambiguities.

Control of pigeon and crow species populations in areas of harvested crop locations is critical to the risk management of adjoining vulnerable crops.

The majority of bird control on agricultural farms is managed by recreational hunters, this resource is vital in order to maintain an affordable and effective 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 derogation has connotations implying some improper control or some level of satisfaction pleasure that is in some way improper. It is the opinion of the ICOSA that without unrestricted access to the resource of recreational hunter's Irish farmers would suffer unnecessary extreme crop damage that would ultimately effect national food security.

- As described previously, bird control over standing crops can further unnecessarily damage standing crops although it is often necessary to control birds directly over damaged crops.
- It can be difficult to retrieve game from standing crops, sometimes leading to wounded birds being immediately dispatched.
- Certain crops such as rape peas, beans and oilseed rape when near harvest have fragile seed heads which will shatter and damage on contact with retrieving dogs 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.
  - o proximity to dwelling houses,
  - o proximity to roads,
  - o proximity to animals that could be distressed by noise (e.g., horses),
  - o accessibility to the fields in question.

- Proper and effective crop control is often managed on harvested fields; pigeons are decoyed into a safe shooting range and efficiently dispatched.
- Wood Pigeons and Crow species 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 or move to other vulnerable crop areas.

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 crow species.

- 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 crow species 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 species 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 and breeding range flyway is favourable, then it's more than likely that the Irish current status of the derogation complies with European law.

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 Irish Common Woodpigeon (*Columba Palumbus*) and Crow species 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 sowing of beans peas and brassica is favourable to increased woodpigeon and crow populations. As agriculture adapts to the increase in varieties of crops, this is in turn 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 Crow species. The circumstances of intermittent crop damage may occur and are extremely difficult to if not impossible to predict as the drought conditions of 2022 showed a new element of drought effected stressed crops further damaged by crow and pigeon species.
- 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.



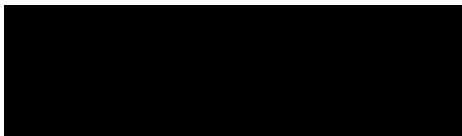
- ICSA would welcome any opportunity to discuss derogations under Article 9 and is willing to assist as appropriate, at any stage, including reviewing/commenting on proposed amendments to Article 9 derogations as they become available.
- ICSA is of the opinion that the present control methods used to reduce the threat of severe crop damage, have proved effective in that the conservation status of pigeon and crow population has remained favourable.

Finally, the ICSA considered the multiple-choice survey submission form as presented by the department as an unrealistic predetermined method of questioning. The question options and predetermined nature of questions in our opinion are none scientific partisan and leave little room for meaningful scientific observations. Hopefully the department will return to the proper process of stakeholder participation for 2023/2024.

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,

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