



IFA

**Submission made to the Public Consultation on Wild Bird Declarations
2023-2024**

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Submission by:

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

IFA would like to take the opportunity to present a written submission to the public consultation process on The Control of Wild Birds Declarations 2023-2024. This public consultation has a direct relevance for all livestock, tillage, and outdoor horticultural producers; however, it is also of indirect concern to all our members and the rural economy in general.

The Irish tillage sector is made up of 10,000 growers with 5,000 of these being specialist producers. In 2020 the sector was estimated to contribute over €1.3 billion in direct economic output and supports 11,000 full time equivalent jobs. 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 is a highly productive and specialised food production industry with farm gate production valued at €467 million in 2020. Despite the small land area dedicated to Irish Horticulture, it accounts for 11% of total agricultural jobs through direct and downstream employment and is the fourth largest contributor to Irish agricultural output.

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. Additionally, 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 worth 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 obvious that the damage caused by pigeons and rooks to arable crops is very critical throughout the months of January, February, June, July, and 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.

Furthermore, IFA wish to emphasise that farmers require a need to control wild birds over standing crops only and that it is solely for the prevention of excessive economic crop damage 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.

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 2023. 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.

A description of the wild bird species which impact on farmers and agricultural activity throughout Ireland is provided below. Further detail on the effects of the bird species in each individual sector is also provided.

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 to 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 from Wild Bird Species to Irish Livestock Sectors

The birds listed above 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.



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 falcon and sparrow hawk. The wood pigeon is the most serious avian agricultural pest.

Wild Bird Species Affecting the Irish Tillage Sector

The main wild bird species which have damaging economic effects on the tillage sector are the Corvids (Jackdaws, Grey Crows, and Rooks) and the Wood Pigeon.

In most circumstances, crop damage from wood pigeons and corvids will occur at either crop establishment or at the early stages of growth and development (January to March) and near harvesting (June, July, August). Species such as corvids can be problematic for early spring planted crops such as spring beans and spring cereals where, if enough numbers are present, substantial amounts of seeds or recently planted seeds can be

removed from the ground and consumed by these birds. If birds are left uncontrolled in these scenarios, part of or the entire crop can have to be re-sown which incurs significant unplanned, additional costs for the farmer.

Significant feeding on established crops can also start in late December/early January, when stubble and other food sources have been exhausted. Winter oilseed rape crops are particularly vulnerable to damage from wood pigeons in the months of December, January, and February. The area of winter oilseed rape sown in Ireland has doubled over the past 3 years to 20,000ha as growers have sought profitable alternatives to cereals to widen crop rotations.

Wood pigeons feast on the palatable, green leaf vegetation of oilseed rape crops. The amount of pre-winter vegetation produced by winter oilseed crops is measured through a metric called green area index or GAI. Higher GAI values require less nitrogen fertiliser application in the following spring months and lower GAI values in crops require increased rates of nitrogen fertiliser. If uncontrolled, grazing by pigeon flocks can significantly reduce vegetation levels and GAI values in oilseed rape crops.

Picture: Example of an oilseed rape plant with significant pigeon grazing damage



While most crops such as cereals and oilseed rape are targeted at the beginning and end of the growing season, field peas are targeted by wood pigeons throughout the growing season. In June, field peas will be coming into flower and these, together with immature pods are particularly vulnerable to attack from wood pigeons. This can result in lodging and physical crop damage in fields which significantly affects both grain yield and saleability into premium human consumption markets.

If cereal crops such as barley and wheat become lodged following periods of rain and wind in the summer months, large flocks of corvids and wood pigeons will gather in these areas (see pictures below) and graze outwards from the lodged areas into the non-lodged areas. This distorts non-lodged upright shafts of cereal crops, making them much slower and more difficult to harvest. The only effective way to control wood pigeons and corvids at this late stage is by lethal means.

Pictures: an example of lodging in spring barley and wood pigeons landing in a lodged area of barley



Wood pigeons, and corvids frequently 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.

Other Wild Bird Species and Irish Agriculture

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.

Pictures detailing examples of significant bird defecation on agricultural buildings



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 2012. Tillage farmers continue to face challenges in relation to cheaper grain imports, loss of plant protection products so they cannot afford the imposition of further regulations which undermine their financial sustainability. The vegetable sector huge decline in the number of vegetable growers since 2014 principally due to 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.