



Submission Re: Derogation Process under Article 9(1)(a) of the EU Birds Directive for the Control of Wood Pigeons

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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 welcomes the opportunity to present a submission re: **Derogation Process under Article 9(1)(a) of the EU Birds Directive for the Control of Wood Pigeons**. This derogation regarding wood pigeons has a direct relevance for Cereal and Vegetable producers, however, it is also of indirect concern to all our members and the rural economy in general. The IFA Grain and Horticulture Committees represent the views of these respective producers.

The IFA Grain Committee covers all the main cereal crops (Wheat, Barley, Oats) in addition to rapeseed, legumes and the main fodder crops such as maize and beet. The IFA Horticultural Committee is comprised of a number of sub-committees namely the Field Vegetable & Protected Crops, Soft Fruit and Mushroom Committees.

In addition to the specific IFA committees mentioned above, 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.

EU Birds Directive

The EU Birds Directive 2009/147/EEC (the Birds Directive), provides a framework for the protection, management and control of all wild birds naturally occurring in the EU. Under Article 9(1)(a) of the directive, Member States may derogate from these terms for one or more of the following reasons: public health and safety; air safety; prevent serious damage to crops, livestock, forests, fisheries and water; protection of flora and fauna.

Wood pigeon are one of the birds which are part of this derogation and until this year farmers were allowed to control this species when they are causing critical damage to crops at any time of the season. This ability to limit wood pigeon damage was allowed all year round due to their tendency to inflict economic damage on a broad range of cereal, legume and vegetable crops throughout the twelve months.

The recent decision by The Department of Culture, Heritage and the Gaeltacht (DCHG) to remove the months of June, July and August from the derogation timeframe for the control of wood pigeon will have serious effect on the economic viability of the tillage and field vegetable sectors. This change to the derogation needs to be reviewed immediately and reversed in order to allow the continued control of the bird species throughout all months of the year.

Wood Pigeon

It is estimated that there are 2.8 million individual wood pigeons distributed throughout Ireland. 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 Pigeon Damage in the Tillage sector.

In summer wood pigeons will form large feeding flocks. 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 – 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 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.

If a cereal crop becomes lodged, large flocks of pigeons 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 is by lethal means.

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

Wood Pigeon 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 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.

It has been suggested that farmers could seek a Section 42 licence to control the wood pigeon outside the derogation period, however this not a practical solution. 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 while waiting for a Section 42 licence or otherwise to be implemented.

Conclusion

It is evident from the information above that due to the economic threat which wood pigeons pose to commercial crops, 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 the birds is very critical throughout the months of June, July and August in particular. 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.

The recent decision by the DCHG to reduce the Derogation period for wood pigeon control, however unintentional, will only contribute to the further decline of these important agriculture sectors in the Irish rural economy. In view of this serious consequence, the decision needs to be reviewed and reversed immediately.