

Hedgerows Ireland submission to the Draft Environmental Report on the Environmental Assessment of the Draft CAP Strategic Plan 2023-2027

Hedgerows Ireland have already made a detailed submission to the consultation process for the CAP Strategic Plan earlier this year and now welcome the opportunity to contribute to this final phase of the consultation process.

General comment on Pillar 1 Eco Schemes:

We are concerned at the lack of environmental equivalence between the currently proposed Pillar 1 Eco Schemes and as a result recommend that this is addressed in the final draft to ensure that optimal environmental benefits are achieved.

Section 3.9 GAEC 8 P252, and Introduction ‘Conditionality’

We propose that the concept of hedgerow quality and maintenance is included in GAEC 8. Current knowledge about the contribution of hedgerows to carbon sequestration, both above ground biomass and soil organic carbon, clearly indicates that taller, wider denser hedges have much higher values. Ongoing research, including Teagasc research by Lillian O’Sullivan, Stuart Green et al, using drone/LiDAR, alongside international work will soon provide accurate on farm carbon figures. We believe that the concept of bigger better maintained hedges should be written into the 2023-2027 CAP in anticipation of this new area of carbon accounting. There will be an associated and commensurate benefit to biodiversity.

Section 5.1 Direct Payments Eco Scheme P.332

The current draft Eco Schemes including the recently announced added schemes do not make reference to the quality, condition or maintenance of *existing* hedgerows.

The opportunity to exploit the carbon, water, biodiversity and many other values of the c. 700,000km of hedgerows in Ireland is thus lost.

Given that a third or less of these hedgerows are in good condition, (Duggan,O. Birdwatch Ireland <https://www.irishtimes.com/news/environment/biodiversity-is-in-a-e-says-birdwatch-ireland-1.4145577>

-and given the known potential of good quality hedgerows to help us meet our goals, (Lanigan, G.Teagasc <https://www.agriland.ie/farming-news/teagasc-outlines-carbon-value-of-hedges-and-grassland/>, data)

--the potential for improvement in meeting our carbon and biodiversity goals through hedgerow quality improvement is evident.

We therefore propose that improvement should be incentivised in three ways.

1. An added hedgerow maintenance/quality Eco Scheme in Pillar 1.
2. Basic quality criteria included in the ‘Space for Nature’ Pillar 1 Eco schemes/Non productive areas/landscape features.
3. Pillar 2 Agri- Environmental schemes which complement the Pillar 1 Schemes above and assess and reward hedgerow quality in more detail.

1. An added Hedgerow Maintenance and Quality Eco scheme in Pillar 1

Suggested elements to include:

- *Existing hedgerows to be retained, and maintained with either side cutting only, or no cutting of internal/non roadside boundaries. Minimum height 2m (except where coppicing or hedgelaying).*
- *3 metre buffer strip to be maintained free of fertiliser and chemical weed control.*
- *Basic quality measure to ensure that gappy hedges are not rewarded.*

2. Quality criteria for existing hedgerows to be included in Pillar 1 ‘Space for Nature/Non productive areas, landscape features’ schemes.

Good quality hedgerows have the potential to provide a massive contribution to climate and biodiversity services, yet while hedgerows are referenced under GAEC8 (‘non productive features’), hedgerow **quality and management are not included**. There is only mention of avoiding cutting in nesting season. Carbon sequestration and biodiversity values are directly related to width, height and biomass of hedgerows for example. So there is huge potential to increase the contribution of both existing and new hedgerows towards our targets.

We recommend that this omission is remedied by a simple, easy to administer measure:

- *Existing hedgerows to be retained, and maintained with either side cutting only, or no cutting of internal/non roadside boundaries. Minimum height 2m. (except where coppicing or hedgelaying).*

3. Pillar 2 AECM (Agri Environmental Climate Measures) Tier 3 ‘Boundary Actions’

- *Results based payments for hedgerows using recognized measures of quality (height, width, species, diversity etc.)*

Suggested template for results based hedgerow quality scheme:

Objective: To **reward** farmers with hedgerows of highest environmental value, while encouraging ALL farmers to **maintain** and **improve** all existing hedgerows.

<https://www.gov.ie/en/consultation/d5d37-public-consultation-on-proposed-agri-environment-results-based-pilot-project/>
See Results of Survey Q. 19: 76% of respondents favour ‘Maintenance and Enhancement of existing environment’ as priority for result based scheme.

<http://www.woodlandsofireland.com/sites/default/files/hedgerow-survey.pdf>

Our proposal is to pay **all** single farm payment applicants for hedgerows on each Land Parcel, based on **length** and **quality**. We recognise 3 main ‘types’ of hedgerow:

Internal Hedgerow: Landowner has 100% control, payment rate is 100% of relevant quality payment category (see below).

Farm Boundary Hedgerow: Landowner has 50% control (i.e. neighbouring property or roadside), payment rate is 50% of relevant quality payment category.

Heritage Hedgerow: Townland, parish, DED, county, and barony boundaries, payment rate is 150% of relevant quality payment category (due to cultural and historical importance).

Claims can be indicated on application maps submitted by the farmer or his agent/planner. To qualify for a particular Quality Category, the length of hedgerow must meet the minimum requirements in all 5 quality sub-categories outlined below. The

scheme must have a 5-15 year target, allowing farmers to move up to higher quality categories over time. Higher Quality Category claims must be supported by geo-tagged photos, and will be subject to inspection by ecologists to confirm suitability.

Quality Category 3: Lowest payment per metre claimed, ~20% of budget.

Applicant must carry out a baseline hedgerow survey. Complete moratorium on hedgerow removal. Cutting and trimming of interior hedges on a 3-5 year rolling cycle, minimum height 1.5m and specimen trees to be retained. Roadside cutting allowed annually. No artificial nitrogen, slurry, FYM or pesticides within 5m of hedgerow base. Tillage parcels (except Organic) **must** have a 5m 'buffer zone' between hedge and crop area.

Width: Less than 3m average

Height: Less than 2m average

No. of 'mature' trees: Less than 5 per 100m hedgerow (farm average)

Biodiversity Index: Lowest 25% [Methodology to be used? e.g. Hedgerow Appraisal Systemii]

CO2 Sequestration Index: Lowest 25% [Methodology to be determined by consultation with experts]

Quality Category 2: Mean payment per metre claimed, ~47% of budget. Applicant must carry out Category 3 above, **plus** specific regeneration projects subject to planner /ecologist/botanist/ survey and requirements. May include but not restricted to coppicing, laying, infill, native tree planting and new hedgerow establishment.

Objective is to upgrade hedgerows to Category 1 maximum payment for subsequent schemes.

[Greening payments? Optional or compulsory ?]

Width: Minimum average 3m wide

Height: Minimum average 3m high

No. of 'mature' trees: Minimum 5 trees per 100m (farm average)

Biodiversity Index: Middle 50%

CO2 Sequestration Index: Middle 50%

Quality Category 1: Highest payment per metre claimed, ~33% of budget.

Applicant must meet all of Category 2 & 3 requirements, having mature hedgerows with specimen trees.

Width: Minimum average 5m wide

Height: Minimum average 5m high

No. of 'mature' trees: Minimum 10 trees per 100m (farm average)

Biodiversity Index: Top 25%

CO2 Sequestration Index: Top 25%

Section 5.3 P388 'AECM Training' and Section 5.3 P454 'Knowledge Transfer'.

We propose that hedge management including hedgecutting techniques are included in training modules to include all relevant aspects of this subject.

Section 4.1.1.2 Agricultural Activity

We are concerned at the inclusion of burning and spraying in this category.