

Hen Harrier Project Submission on the Draft CAP Strategic Plan

The CAP Strategic Plan and in particular the proposed new AECM in Co-operation Project Areas represents a welcome improvement in the ambition for agri-environment schemes in the CAP. The inclusion of a locally adapted response tailored to deliver for local objectives is particularly welcome. The establishment of locally based project team and the availability of substantial funding through the Community fund is a very welcome and progressive step. TO ensure that this realises its potential, the management of this fund must be responsive to the needs established in the local plan. This requires an acknowledgement that some landscape level works, for example, the removal of Rhododendron will be expensive and rewetting of bogs. The allocation of resources from the Community fund towards these actions must consider the priorities identified in the plan for each CP area and cannot be constrained by caps on what is invested on an individual farm.

It is important that the CAP Strategic Plan does not unintentionally restrict the room for manoeuvre of the future Co-operation Project teams in devising strategies to achieve the objectives identified for the respective CP areas. To this end I am suggesting that the following be considered for inclusion in the CSP.

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- Add “Wild Bird Cover strips” to section dealing with GAEC 8 and SMR 3,4 & 8

Tillage has ceased in most HNV areas. Sowing wild bird cover strips is an effective mechanism for improving the supply of food to small birds, rodents, and insects. In turn these are the base of the food chain for specialist predators such as Hen Harrier and Barn Owl. Sited strategically across a landscape this action can support the prey base and hunting techniques for these species. The dependence on contractors in HNV areas due to the lack of suitable equipment on livestock farms for preparing sites for crop establishment and the minimum cost associated these requires a payment of €359/ 100m. Without this minimum level of support uptake of this valuable action will be inhibited as the payment will not cover the cost of delivery for the action.

- Add “Specialist Wildlife Supports, e.g. Winter and Summer Roosts for Lesser Horseshoe Bats, Wader Scrapes and mitigation of barriers to fish migration” to sections dealing with GAEC 8 and SMR 3,4 & 8.

Improving habitat quality may not be enough to benefit key species if other barriers exist. Provision of specialist supports can optimise the benefit of other AECM investments for these species. The ability to develop bespoke responses to identified local needs must be retained throughout the programme period. For example, the absence or summer roosts may prevent the utilisation of suitable habitat by Lesser Horseshoe Bats and the ability of Freshwater Pearl Mussels to sustain their populations in potentially suitable habitat may be constrained by barriers to movement of trout and salmon that host their larvae.

- Add “Post Fire Recovery Response” to sections 1 & 2 and SMR 2 & 4.

The effects of a wildfire on the landscape persist long after the fire has been extinguished. The recovery of vegetation in burned areas will generally benefit plant species that are adapted to fire. These include the principal fuel species in the Irish uplands, i.e. Purple Moor Grass (*Molinia caerulea*) and Gorse species (*Ulex europaeus* and *U. galli*). These species can come to dominate

burned areas and present an even greater fire risk in the years ahead. Breaking the cycle of wildfires requires a bespoke response on each site. This may include fuel breaks, isolation of ignition points, planting/ encouragement of non-flammable species, raising of water table and the reintroduction of livestock. The precise response to be determined by the characteristics of the site.

- Add “Post Landslide Response” to sections dealing with GAEC 1 & 2 and SMR 2 & 4.

Landslides create large volumes of unconsolidated peat that is vulnerable to mobilisation and export to receiving water courses. The CP project team in conjunction with local farmers must be able to identify suitable response to negate this ongoing threat and the community fund should be allowed to fund the required responses.

- “Monitoring and Nest Protection”

In practice both of these tasks will have to be conducted by professionals within or under contract to the CP team. However the delivery of these functions is dependent on engagement with farmers, the facilitation of access to lands and sharing of information about sightings of species of interest. In some cases the CP team may ask a farmer to delay or desist from certain agricultural practices to avoid disturbance to wildlife at key sites, e.g. Hen Harrier nest sites identified through monitoring. This engagement with the project team has a cost to the farmer and should be supported through the community fund.

- Ensure that support for “Fencing including Solar powered fencing” and “Gates” is available through the Community fund.

Managing the movement of livestock across the farm is critically important for the delivery of improved habitats. Delivering improved grazing patterns either to address wildfire risk, facilitate the recovery of bare peat or to allow grazing sensitive plants species to flower and set seed requires fencing and water infrastructure. For this reason co-investing with farmers on the delivery of the supporting infrastructure may be very desirable for the delivery of the desired results. Support for fencing should be at 50% of the cost.

In addition to actions that are directly supported in Co-operation Project Areas, (either through Non-Productive Investments or through the Community fund)the Co-operation Project Teams should assist participants with the screening of actions to reduce the regulatory and planning costs faced by farmers in NATURA 2000. This regulatory burden on actions which would be considered as normal farming practice on undesignated lands imposes real costs and is a significant contributor to negative sentiment towards land designations. Practical assistance to participants would be helpful in building local consensus on achieving the objectives to be identified in the Local Plans.

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Project Manager

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