31 Days, 31 Reasons Campaign

Four environmental organisations (An Taisce, Birdwatch Ireland, Irish Wildlife Trust and the Hedge Laying Association of Ireland) joined forces to campaign against proposed changes to Section 40 of the Wildlife Act (contained in the Heritage Bill 2016) being made by the Minister for Arts, Heritage, Regional, Rural and Gaeltacht Affairs, that would allow burning in the uplands in March and hedge cutting in August and from 2017 onwards.

The proposed changes are not designed to strengthen Wildlife protection they are to provide convenience to some sectors of the farming community. During the month of August 2016, focussing on hedgerows, the groups showed, one reason a day, why they consider the proposed changes to be flawed and how they will be detrimental to wildlife and sustainable farming in Ireland.

Join the campaign to resist these changes and make sure that in August 2017 and beyond our hedgerows and the wildlife that depends on them are still given some protection.

Please sign our petition to let the Minister know that you oppose the proposed changes to the Wildlife Act.
https://my.uplift.ie/petitions/no-to-more-slash-and-burn

This document contains all of the “31 Days” Facebook Posts and images.
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31 Days, 31 Reasons: #1
Hedgerows play a vital role in conserving native woodland biodiversity

In ancient times Ireland was covered in broadleaf woodland but is now one of the least-forested countries in Europe. Only 2% of the country is covered in native or semi-natural woodland, whereas hedgerows cover around 3.9%, making them a vital habitat for wildlife in our agriculturally-dominated land. Native hedgerows support numerous animals and can have up to 144 plant species. These strips provide food and shelter and act as linking corridors between habitat patches.

In contrast, over 72.8% of our forestry plantations contain non-native conifers that support relatively low levels of biodiversity. Many of our hedgerows are hundreds of years old and appropriate management is the key to their sustainability and ability to support a diverse ecology. The proposed changes to the Wildlife Act are about convenience for farmers, not good hedgerow management or wildlife protection. Help us stop the changes to the Wildlife Act and help save our hedges and wildlife!
One of the reasons cited for the proposed changes to the Wildlife Act is the need to deal with Road Safety issues. All of the groups involved in this campaign recognise the need for exemptions from the cutting restrictions to deal with matters of public health and safety, but there is already provision for this in the existing legislation. As Minister Heather Humphreys recently has acknowledged in an article in the Irish Farmers Journal - “The councils do have authority if there’s a health and safety issue. They can cut the hedge in terms of road safety.” Irish Farmers Journal 21-6-2016.

Local Authority engineers point to the lack of compliance of certain landowners as being one of the main obstacles to their ability to deal with hedgerow related road safety issues. Roadside hedges adjacent to afforested land are a particular problem.

If hedges have been cut appropriately at the right time of year (September to February) there should be little need for any cutting during the closed season in most cases. The hedge growth in the photo that is obscuring the view of the road is 2 years old – had it been cut last winter it would not be causing a problem now. Where there is a safety issue during the closed season, we would ask Councils and contractors to be measured and sensitive in the work that is done. Deal with the safety issue and no more.

One of the arguments that has been made by some is that allowing hedge cutting in August will improve health and safety on roads. This is simply not the case as exemptions already exist under the current legislation for health and safety reasons. Hedge cutting can be carried out carried for “reasons of public health or safety by a Minister of the Government or a body established or regulated by or under a statute”. In addition to this, road side hedges only make up a small percentage of the total hedge area in Ireland. Making a blanket change to the protections afforded to hedgerows would therefore not make sense.
31 Days, 31 Reasons – Day 3  Nesting birds will be seriously impacted – Case Study: Yellowhammer

The government will weaken the laws that protect nesting birds if the Oireachtas approves the proposal by Minister Humphreys to allow burning in the uplands in March and hedge-cutting and removal in August. This will seriously impact nesting birds and other biodiversity which depends on these habitats at critical periods. The Yellowhammer is a canary-like bird with a beautiful song. They are seed-eating birds which thrived in Ireland when mixed agriculture presided but are now in serious decline with a 61% drop in breeding range since the 1970's. Their numbers are also down significantly and because of these factors Yellowhammer is on the Red List of Birds of Conservation Concern in Ireland. Yellowhammer nests almost exclusively in hedgerows throughout August and into September. If the Minister allows hedge-cutting in August then this species will be further seriously impacted. See BirdWatch Ireland article on Yellowhammer here
http://www.birdwatchireland.ie/LinkClick.aspx?fileticket=3QbiJhHsOk%3d&tabid=1439
31 Days, 31 Reasons – Day 4  August Hedgerows provide a vital source of food for our pollinators

A third of our bee species are at risk of extinction due to habitat loss and pesticide use. Butterfly numbers are also in decline. Hedgerows provide a vital source of food for our pollinators, particularly in the month of August when many wild plants are in flower. To maintain pollination, a diverse and abundant food supply is needed from early spring right through to late autumn. Cutting even one year’s growth would have a significant impact on food availability. Teagasc guidelines are to cut the hedgerows in January and February to “avoid destroying the supply of fruit, seeds and berries in autumn”. With the All-Ireland Pollinator plan now launched due to the concern over the decline in our pollinators, to also introduce changes to legislation that will allow the cutting of hedgerows at such a crucial time defies logic.
31 Days, 31 Reasons – Day5.  Wildlife in the firing line

The sign may be warning road users but what Warning does wildlife get? Flying debris from a rotary flail hedge cutter presents a danger to machine operators and passers by but it is life threatening to any nestlings and other wildlife living in the hedge.

The tractor-mounted flail is by far the most common means of managing hedgerows. With the rotor spinning at 2400 rpm the (32 or more) flail heads are spinning at between 100 and 125 mph firing thousands of bullets of flailed debris back in to the heart of the hedge at high speed. The flail head, if correctly maintained, is designed to direct flailed material back in to the body of the hedge and minimise debris flying out into the wider environment. Even so tractors should be fitted with special glass, metal mesh or polycarbonate guards to protect the operator. There is no protection for the wildlife in the hedge; they are in the firing line.

The average noise level (up to 88dB), even in a protected tractor cab, can be sufficient to require ear protection for the tractor driver. The dB level at the flail head itself, which is metres away from the cab and un-buffered, must be considerably higher. We have no data for peak noise levels.

The August hedge is still alive with growth and activity; using high-powered machinery on the hedge at this time of year is bound to cause harm. After cutting or flailing, the interior of the hedge is more exposed to the elements. Any surviving nestlings (if any) are more exposed to predation.

Would you want to be inside a hedge when a flail passed over? That is what wildlife will be exposed to in August 2017 if proposed changes to the Wildlife Act are enacted.
The core tenet for having dates that define the hedge-cutting and burning season is to protect nesting birds in hedgerows and the uplands. BirdWatch Ireland presented Minister Humphreys with the scientific evidence of the first egg laying dates of key red listed species which breed in our uplands and hedgerows. This data from the British Trust for Ornithology is the best available information that we have and includes records from Ireland. We have called on the Minister to commission Irish research on this subject before any changes are made to the dates for hedge-cutting and burning and she is proposing to change the dates first and possibly then do the research.
31 Days, 31 Reasons: #7
Cutting and destroying hedges during August will be bad news for Irish bats.

31 Days, 31 Reasons – Day7  Bats

If hedge cutting is allowed during the month of August then Irish bats will suffer.

Bats are fascinating little creatures and are important part of our natural heritage. These harmless mammals provide a number of benefits to nature and us. They act as pest controls by eating large numbers of pests such as midges and moths and serve as good indicators of the health of the ecosystem.

However, bats are an increasingly vulnerable species, being threatened by habitat loss and other pressures. Hedgerows are valuable habitat providing home, food, shelter, and highways for bats. The removal and disturbance of hedgerows, during August will have serious impacts on bat populations, rendering them less suitable for feeding, roosting, and less suitable for navigation particularly for young bats. August is a very important month as baby bats born in June and July leave to search for suitable feeding and roosting sites and hedgerows are important habitats for such activities.

The intensive management of hedgerows reducing their height and width, decreases the available habitat for wildlife. There is evidence that bats will stop foraging over short mechanically cut box shaped hedgerows. Bats prefer large, bushy hedgerows due to the windbreak effect of bigger hedges and a higher abundance of insects on the sheltered side of the hedge. Increasing the intensity of hedgerow management by allowing hedge cutting in August will impact on many of the species which rely on hedgerows including bats.

Sign the petition and help Save Our Hedges!
#31Reasons  #NoToMoreSlashAndBurn

Credit: Francois Beguier  Pipistrelle Bat https://creativecommons.org/licenses/by-nc-nd/2.0/
31 Days, 31 Reasons: # 8
New research shows how reduced hedgerow cutting can benefit Butterflies & Moths

Hedgerows are crucial for a number of insect species, providing food, breeding sites and shelter - particularly in an intensive agricultural landscape. Latest research on the timing and intensity of hedge cutting has revealed that the cutting of hedgerows in the autumn is precisely what butterflies and moths don't need. In cases where hedgerows were cut in winter compared to autumn, there were significantly more larvae and pupae found on hedges; while cutting every three years, instead of every year or two years, increased the abundance even further. Intensity of cutting was also shown to affect the variety of species found, with hedges cut for incremental growth, rather than the standard cut, having greater species richness.

Read the full paper: Little and late: How reduced hedgerow cutting can benefit Butterflies & Moths (Staley, Joanna T.; Botham, Marc S.; Chapman, Roselle E.; Amy, Sam R.; Heard, Matthew S.; Hulmes, Lucy; Savage, Joanna; Pywell, Richard F.Agriculture, Ecosystems and Environment 224 (2016) 22–28.)
31 Days, 31 Reasons: # 9
Hedgerows and carbon sequestration

Research has suggested that hedgerows and non-forest woodlands could potentially sequester 0.66–3.3t CO2/ha/year. These estimates exclude potential emissions associated with hedgerow management or disturbance. What is clear is that cutting hedges in August during the growing season will negatively impact on the amount of carbon they can store.

Ireland’s agricultural sector recently successfully lobbied for the right to use loopholes in the EU’s climate policy to avoid having to make what are consider very necessary reductions in greenhouse gas emissions. 9% of the 30% reduction in emissions sought for agriculture are going to be offset by sinks in forestry and other carbon sinks. At the same time the Irish Government refuses to account for emissions resulting from the destructs of Ireland’s bogs or implement policies which would improve carbon sequestration in the Irish landscape such as encouraging wetland and peatland restoration and increasing permanent native woodland cover.

Carbon Sequestration by Hedgerows in the Irish Landscape: [https://www.epa.ie/pubs/reports/research/climate/ccrp-32-for-webFINAL.pdf](https://www.epa.ie/pubs/reports/research/climate/ccrp-32-for-webFINAL.pdf)
Hedgerows are the most biodiversity-rich habitat in Ireland's farmed landscape and are hugely important for birds as a source of food, nesting sites and shelter. Many of our specialist farmland bird species are in decline due to changing agricultural practices further highlighting the importance of hedgerows. Several bird species feed on the hips, haws, insects and seeds found in the hedgerow layers of trees, shrubs and ground flora. Allowing the 'cutting, grubbing or destroying' of hedgerows in August will be devastating for farmland birds and other animals by depleting this food resource and impacting on their condition as they head into the winter.

In 2007 the European Court of Justice found Ireland guilty of, among other things, failure to protect birds in the wider countryside. This court case is called The Birds Case and it is still open against Ireland for these failures. The proposed changes will weaken the protection of birds in the wider countryside.
31 Days, 31 Reasons – Day 11  When is a Pilot not a Pilot?

Answer: When it is a Trojan Horse.

Proposed changes to the Wildlife Act are reported as being a 2-year Pilot. Detailed study of the wording of the legislation arouses some suspicion. No methodology for a study of the impact of the changes has been produced; there is no mechanism specified for the collection of data or comparison of results or even clarity on what is to be established by this 'Pilot'. What value would there be in a 'Pilot' if no baseline data is collected before the changes are introduced? If the legislation is passed there is no necessity for a Pilot Study to be put in place before the changes to the hedge-cutting dates become applicable. More worryingly still there is an open-ended reactivation clause in the Bill which would allow for the changes to be extended indefinitely. There is no requirement for any Pilot study to be evaluated before this happens, in fact re-activation would need to take place before an evaluation of a full 2 years worth of data could take place.
Cutting hedgerows in August increases the potential to spread Japanese Knotweed (seen here taking over a hedge in County Limerick).

Invasive species* are one of the key threats to biodiversity in Ireland. Japanese Knotweed is an invasive species that is commonly found in hedgerows, particularly roadside hedgerows. There is a high risk of spreading Japanese Knotweed through flailing and cutting the stems. The cut material has the potential to grow again in nearby soil, be dispersed along watercourses or moved from hedge to hedge and farm to farm on hedge-cutting machinery.

Japanese Knotweed shoots can appear as early as March and can potentially flower until the end of October so August would not be a good time to cut hedgerows containing this plant.

The Wildlife (Amendment) Act 2000 states that anyone who plants or otherwise causes to grow in a wild state in any place in the State any species of (exotic) flora, or the flowers, roots, seeds or spores of (exotic) flora shall be guilty of an offence.

*Invasive species are species that have been introduced (deliberately or accidentally) by humans and have a negative impact on the economy, wildlife or habitats of Ireland.
31 Days, 31 Reasons: #13
Cut, Grub or Destroy Otherwise

If the Heritage Bill is passed without any Ministerial Restrictions then August will be open season for the “Cutting, Grubbing or Destroying Otherwise” of hedgerows.

The IFA claim that all they want to do is to be able to carry out routine annual maintenance in August*. Why then do the proposed changes allow for the ‘cutting, grubbing or destroying otherwise’ of hedgerow vegetation? Either the proposed changes are very poorly framed or the intention is to permit much more than annual maintenance. Under the proposed changes the Minister has stated that cutting will be permitted in August with ‘strict restrictions’. No ‘restrictions’ have been produced for discussion. There is no necessity in the legislation for any Restrictions to be in place before the Bill would be active.

“What is actually being allowed is not the knocking of trees or the cutting of hedges, it’s the cutting of one-year growth,” said IFA environmental and rural affairs chairman Harold Kingston. “That’s pretty much what we’ve been suggesting as suitable for doing in August because the last thing we want to do as farmers is cause harm to bird life.” Quoted in Irish Times 24-1-16

*Sign the petition and help Save Our Hedges! #31Reasons #NoToMoreSlashAndBurn
An Ecological Focus Area is an area of land upon which tillage farmers must carry out agricultural practices that are beneficial for the climate and the environment. How is cutting hedges in August consistent with this?

Winter tillage farmers are looking to harvest one crop in July / August and have next year’s crop in the ground during August / September. It would be convenient for them to do any necessary hedgerow management in the window between harvesting one crop and sowing the next. This is (possibly) in conflict with the law as it stands but is also in conflict with the principles behind Ecological Focus Areas. Under the Greening measures of the Common Agricultural Policy, to qualify for Greening payments, any farmer that has more than 15 Hectares of tillage must have a minimum of 5% (possibly rising to 7% in 2017) of the area designated as Ecological Focus Area. An Ecological Focus Area is an area of land upon which farmers must carry out agricultural practices that are beneficial for the climate and the environment. The main aim of an Ecological Focus Area is to improve biodiversity. On most qualifying farms in Ireland, much or most of the Ecological Focus Area is hedgerow. Where is the consistency in using taxpayer’s money to pay farmers to maintain Ecological Focus Areas to improve biodiversity then change the law to permit them to cut hedgerows in August for farming convenience?
31 Days, 31 Reasons: #15

Additional Safety Risk from Unregulated Hedge Cutting Machinery

31 Days, 31 Reasons – Day15   Additional Risk to Road Safety

POTENTIAL SIGNIFICANT DANGERS ASSOCIATED WITH THE USE OF THIS MACHINE:

These are words from the Operators Safety Manual of a typical tractor-mounted rotary flail hedge cutter. Are these machines safe to be working on public roads?

As we showed in an earlier post, there is provision in the existing legislation to deal with road safety issues caused by hedgerow growth. However, the proposed changes to the Wildlife Act introduce a potential added risk to road safety. August is one of the busiest months of the year for road traffic. It is holiday season so there is tourist traffic and there are more pedestrians and cyclists out and about, including schoolchildren. Is this a good time to be allowing powerful, unregulated hedge-cutting machinery to be working on public roads? These machines do not have to be independently tested to make sure that they are safe; the operators don’t have to pass any test to show they are competent or safe to use them.

This is from the Operators Manual of a typical rotary flail hedge-cutter, the most commonly used machine for cutting hedges.

POTENTIAL SIGNIFICANT DANGERS ASSOCIATED WITH THE USE OF THIS MACHINE:

● Being hit by debris thrown by rotating components.
● Being hit by machine parts ejected through damage during use.
● Ensure the tractor front, rear and side(s) are fitted with metal mesh or polycarbonate guards of suitable size and strength to protect the operator against thrown debris or parts.

Where is the safety provision for those nearby - people or wildlife? Warning road signs should be in place to warn road users – not all contractors do this. Health & Safety recommendations indicate that before starting to cut, the hedge should be inspected and any wire, bottles, cans and other debris should be removed. How often is this done? After cutting any debris should be cleared from the road.

Before we start thinking about extending the cutting season in to August we should be making sure that these machines are safe and that their operators have proved that they are competent and safe to operate them. This includes the area of bio-security.
31 Days, 31 Reasons: #16
Correcting the anomaly between Ireland and the UK over Hedge Cutting Dates

England, Scotland, Wales, Northern Ireland        Ireland

August 2017

Sign the petition and help Save Our Hedges!

#31Reasons  #NoToMoreSlashAndBurn

31 Days, 31 Reasons – Day16   Correcting the anomaly between Ireland and the UK over Hedge Cutting Dates

The proposed changes to the Wildlife Act would put Ireland out of step with the UK and out of step with the science.

Volunteers for the British Trust for Ornithology (BTO) collected more than 40,000 nesting records to prove that finches and buntings nest through August. Ground-nesting skylarks and corn buntings are also destroyed by hedgecutters driving along field margins. No similar data exists for Ireland. Surely the thing to do is to conduct the research and base any changes to the law on the findings.

Dr Leech (head of the BTO Nest record Scheme) explained: “When birds leave the nest the feathers are not fully grown and the flight muscles have not been properly exercised. They are very weak fliers.

“Most songbirds tend to sit by the nest in cover and they are still fed by the mother. After they have fled the nest, some species are still sitting there up to three weeks later begging for food. The birds can still be disturbed by hedgecutting during this period.”

The IFA Submission (Jan 2015) to the public consultation process stated “An anomaly presently exists whereby hedge cutting and gorse burning restrictions imposed on farmers in the Republic of Ireland are broadly out of line with restrictions imposed in other regions, including Northern Ireland, Scotland, England and Wales.” Ironically the changes proposed by Minister Humphreys would actually create the anomaly. As the IFA were using the anomaly argument in Ireland the Cross Compliance rules for farmers were being changed by the regions of the UK, based on scientific evidence, to extend the closed period for hedge cutting to include the month of August. There was opposition and lobbying from farmers and contractors but the respective Governments have held firm to the science.


31 Days, 31 Reasons: # 17

Hedgerows provide crucial habitat for nesting hedgehogs

The European Hedgehog is listed as protected under the Wildlife Act. However, the proposed changes to the Wildlife Act will affect the very species it’s supposed to protect. With a lack of deciduous woodland here in Ireland, hedgerows provide vital habitat for hedgehogs that create nests in the hedgerow itself and also feed on the numerous insect species that hedgerows support. August is a particularly crucial month for females, who will have a second litter around this time and are particularly sensitive to disturbance, which can cause them to abandon their young. Hedgehogs also need to feed as much as possible in August and September to ensure that they have enough fat reserves for winter hibernation. Therefore, cutting, grubbing and destroying hedgerows during a crucial time for insects will also impact on the hedgehog’s ability to feed. With hedgehog numbers dropping due to the changes in land use in our countryside, pesticide poisoning and accidental death by road collisions and gardening and agricultural accidents, there has to be an improvement in habitats for the hedgehog, not this proposed reduction.
31 Days, 31 Reasons – Day 18  Contrary to Teagasc Recommendations

Proposed changes to the Wildlife Act run counter to Teagasc Best Practice Hedge Management Advice. Interestingly, Teagasc did not make a submission to the public consultation.

Don’t cut annually; leave hedge cutting until late winter

Teagasc recommend that late winter is the best time to cut hedges from an environmental viewpoint. “Do not cut hedgerows from late February to the end of August to avoid destroying nesting birds. Late winter is best, if practical. It avoids destroying the supply of fruit, seeds and berries in autumn.”

There is an argument from the farming community that they just want to be able to trim the annual growth of hedgerows in August. Cutting hedges annually is contrary to Teagasc Best Practice Guidelines. Their advice is for hedge-cutting on a 3-5 year rotation, not annually (unless necessary for safety reasons).

“While light annual cutting can benefit hedgerows, it is not good for wildlife. Flowers or fruit are not produced.”

Should we be looking to change primary legislation to permit actions which are contrary to the States own recommendations for best practice?
31 Days, 31 Reasons: # 19
Cutting “just the annual growth” will affect our wildflower populations

It’s been mentioned that landowners and farmers just want to cut “the annual growth” from early August. However, we are concerned that this does not consider the negative impact on our wildflower populations, let alone the insects that depend upon them.

Hedgerows act as refuges for wildflowers; by cutting in August, many wildflowers, including hedgerow and verge species like self-heal, wood avens, bittersweet, dead nettles, figwort, ground ivy, knapweed, hedge woundwort, vetches, tutsan, nipplewort and stitchwort, will have not completed their annual cycle of seed production. Cutting before they have been able to set seed not only deprives them of the opportunity to reproduce, it deprives the other species that depend on them. With wildflowers in decline, many pollinators are also in decline, especially our bees and butterflies that are threatened with extinction.
31 Days, 31 Reasons – Day20  No positive changes to protect hedgerows from poor management

Proposed changes to the Wildlife Act don’t address destructive hedgerow management practices or repeated poor management.

Based on data in the National Hedgerow Database (http://www.heritagecouncil.ie/wildlife/our-initiatives/hedgerow-appraisal-system-and-national-hedgerow-database/) less than 25% of hedgerows that have been surveyed can be considered to be in favourable condition. Too low, too narrow, too gappy, poor structure and lack of ground flora diversity are the main failings. The proposed changes to Section 40 of the Wildlife Act do not address this and have the potential to exacerbate some of the problems, especially in terms of depleting ground flora diversity. What about putting some form of restriction on the use of excavator machinery to bash down mature hedgerows; or preventing hedgerows from being cut excessively in a way that damages their long term viability?
31 Days, 31 Reasons – Day 21  Land Trafficability problems can be overcome

More and more hedge-cutting contractors are using equipment mounted on to tracked machines / mini-diggers (lower ground impact) to work around the problem of land trafficability caused using large, high-powered tractors on wetter land in the autumn / winter.

The IFA cite land trafficability as one of the key reasons for needing to be able to cut hedges in August.

An Irish company, Slanetrac (http://www.slanetrac.ie/) manufacturers a small circular saw, flail cutter and finger bar cutter for use with a mini-digger.

The Rural Development Programme should be used to support contractors in moving over to technologies that result in more environmentally benign hedge cutting systems.

Land trafficability – On average September is drier than August

Met Éireann’s average monthly data statistics show that September is traditionally a drier month than August. Here are the figures from some key agricultural data centres.

<table>
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<td>Gurteen Ag. College</td>
<td>84.9mm</td>
<td>74.8mm</td>
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<tr>
<td>Moorepark, Fermoy</td>
<td>83.6mm</td>
<td>79.5mm</td>
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<tr>
<td>Ballyhaise</td>
<td>90.7mm</td>
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Day length is shorter and temperatures a little lower in September reducing the potential for drying but these figures show that not being able to cut in August shouldn’t mean an end to hedge cutting opportunities because of wet land. Periods of hard frost during winter also offer opportunities for routine hedge management; remember the two cold winters of 09/10 and 10/11 when land was hard frozen for weeks.
31 Days, 31 Reasons – Day22
Barn Owls are still feeding their young

It has long been suspected that our hedgerow networks are essential habitats for foraging Barn Owls, particularly in intensively-farmed landscapes, as they represent areas of good cover and food for their small mammal prey.

We no longer need to suspect!

The importance of healthy hedgerows for a wide range of biodiversity can be immediately obvious, such as for flowers, bees, butterflies and song birds to name just a few. For others, it may be less obvious, and this is the case for raptors which occur in low numbers and can be difficult to observe. As top predators in an ecosystem, raptors can tell us a lot about the health of our environment.

This summer for the first time, BirdWatch Ireland have used light-weight GPS data loggers to track the hunting behaviour and movements of Barn Owls in Ireland in precise detail, the importance of hedgerows is as suspected but nonetheless incredibly revealing. This video on the Irish Raptors blog (http://irishraptors.blogspot.ie/2016/08/seeking-out-hedgerows.html) show the movements of a female Barn Owl as she hunts to provision her three young. These data are from late July, but the chicks will not fledge until late August and will remain dependent on the adults during this time so the Barn Owls will continue to need hedgerows in their home range to provision food for their young.

Barn Owls are Red-listed as Birds of Conservation Concern in Ireland, having undergone huge population declines and range contractions in recent years. They are an urgent priority for conservation action and, as the video shows, maintaining hedgerows and their ecosystems of which Barn Owls are a part are essential throughout the year, but especially during the chick-rearing stage from June to September.
31 Days, 31 Reasons: #23
Lack Of Balanced Consultation

The proposed changes to Section 40 of the Wildlife Act were the subject of a public consultation process. The overwhelming response from members of the public was favourable to hedgerow conservation.

The consultation call stated:

“Protection of Biodiversity
While the review will consider all options set out above, and any other which may arise during the consultation period, it should be noted that any changes must be in line with Ireland’s obligations to protect and enhance our habitats, birds and other species and not to increase the threat to them. This will be an overriding consideration in any proposals for change.”

Clearly this has been ignored in favour of the needs of a section of the farming community.

In fact the consultation process for the proposed changes did not meet the Government’s own principles on public consultations.

1) “A clear and proportionate consultation approach should be adopted by officials” Consultation Principles & Guidance, Department of Public Expenditure and Reform

Since January 2015 the Minister has met with the IFA at least 4 times and the ICMSA and ICSA at least once. The hedge cutting issue has definitely been on the Agenda at least some of these meetings. Requests for a meeting with the Minister or her officials from the groups involved in this campaign have been refused.

2) “Officials should recognise that involving stakeholders from the earliest possible stage in the policy development process will promote transparent and comprehensive participation.” Consultation Principles & Guidance, Department of Public Expenditure and Reform

The Consultation Call for the Review of Section 40 contained the following
“It has been suggested that landowners should have clear power to cut roadside hedges from the end of July on the basis that birds will have generally left their nests by then.” — a clear indication that certain stakeholders were involved at an earlier stage than others.

3) “To encourage active participation, officials should publish a consultation report which may be in the form of a summary table identifying the number of submissions received, key points raised in the submissions, whether these were taken on board or not, and future plans (if any) for further engagement. Where stakeholder input could not be reflected in the proposed policy, officials should provide a brief explanation as to why not.” Consultation Principles & Guidance, Department of Public Expenditure and Reform.

No Consultation Report has been produced by the Department for the Review of Section 40 of the Wildlife Act. The Hedge Laying Association of Ireland produced its own report based on the published submissions to the consultation. A copy is available from them at hlai@eircom.net

4) “A review should be conducted when the consultation process has been completed and included in the final consultation report.” Consultation Principles & Guidance, Department of Public Expenditure and Reform

There has been no published review of the consultation process.

If the Minister is confident that the Public Consultation was carried out to best practice standards let her commission an independent review of the process.
Autumn is a time when perennial plants, including trees and shrubs, replenish their carbohydrate reserves to store energy that supports next spring’s growth.

The longer the leaves remain on the tree the more time the tree has to transfer more of the sugars, nitrogen and other valuable substances back into the body of the tree before the leaves fall. Cutting growth before leaf fall, as would be the case with August cutting, is depleting the resources of the trees and shrubs that make up the hedge.

There is an opportunity for hedges cut in August to start growing again before the onset of winter dormancy. This new growth may not have hardened off by the time of the first frosts and could be damaged.
31 Days, 31 Reasons: #25
Lack of Enforcement

If Section 40 of the Wildlife Act is to offer meaningful protection to Wildlife then the present closed period should be better supported with more consistent enforcement rather than be further eroded.

Although there have been 40 prosecutions for the illegal cutting of hedgerows since 2011, even a quick browse through the comments to our #31Days Posts suggests that potentially illegal cutting is widespread and not just restricted to August. How much enforcement is there of our wildlife laws?

The Department of Arts, Heritage and the Gaeltacht, which is responsible for the NPWS, itself commented in 2011 that: “The National Parks and Wildlife Service is particularly under-resourced. The European Court of Justice has criticised the resources applied to designation, monitoring and enforcement of EU conservation law, including in one of the most comprehensive environmental cases delivered against a Member State in the ECJ Birds Case in 2006.

As a result, the Department brought in outside consultants to review the service. The report, published in 2010, recommended an increase in staffing levels of over 20% in the medium term as well as other reforms. However, during the last government, the non-pay NPWS budget was cut by 67% and the staff budget is still being underfunded annually by 1.5 million. This, coupled with the embargo on recruitment within the NPWS, has resulted in knock-on effects, including reduced budgets for important survey work on protected species, for management planning and setting conservation objectives, and for education and awareness work.

More recently, in relation to the purchase of land within the Wicklow Mountains National Park, Mr Ring, the Minister of State at the Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs said that between 2008 and 2011 State funding of his department had been cut by 70 per cent. Total funding for the National Parks and Wildlife Service in 2016 was €2.5 million, the valuation NAMA had put on the parklands.

31 Days, 31 Reasons – Day 26 Hedgerows provide vital habitat for a whole range of species

So far, 31 Days, 31 Reasons has highlighted the value of hedgerows for birds, bats, bees, butterflies and hedgehogs. However, hedgerows support so many species it would take us over 5 years to highlight them all individually!

Studies have shown hedgerows support up to 144 species of plants, over 1,700 insect species, nearly 100 other invertebrate species, dozens of bird species, 20 mammal species, two amphibian species and our native reptile, the common lizard!

Hedgerows are even more critical here in Ireland as they cover approx. 3.9% of the country compared to our native or semi-natural woodland, which covers only a pitiful 2%.

If hedgerow cutting is allowed throughout the month of August the interactions between all of these species, the ecology of the hedgerow, will be altered. Hedgerows support a complex food web, with animals being dependent on the food the plants, insects and other animals provide. Compromise the habitat for one species and there will be consequences for others, a potential negative domino effect.
August cutting is depriving agricultural soils as well as nature.

When hedges and trees lose their leaves naturally in the autumn the nutrient, mineral and organic matter contained in the leaves is distributed over the adjacent farmland contributing to improving soils. When hedges are flailed before leaf fall all of this material is fired in to the base of the hedge. Not only does this deprive the agricultural land of the benefit, it results in a build up of a mulch layer in the hedge bottom which favours the growth of strong plants like nettles, docks, thistles and cleavers at the expense of the greater diversity of more delicate hedgerow flora. A predominance of nutrient-rich favouring ground flora is one of the principle reasons that hedgerows are not in favourable condition. Farmers don't seem to like nettles, thistles and docks either and often end up spending money on herbicides to eliminate them causing more problems for biodiversity. Is this sustainable farming?
31 Days, 31 Reasons: #28
Less blackberries, less to forage

Blackberry-Picking by Seamus Heaney

"Late August, given heavy rain and sun
For a full week, the blackberries would ripen
At first, just one, a glossy purple clot
Among others, red, green, hard as a knot.
You ate that first one and its flesh was sweet
Like thickened wine: summer's blood was in it
Leaving stains upon the tongue and lust for
Picking. Then red ones inked up and that hunger
Sent us out with milk cans, peat tins, jam-pots
Where briers scratched and wet grass bleached our boots.
Round hayfields, cornfields and potato-drills
We trekked and picked until the cans were full,
Until the tinkling bottom had been covered
With green ones, and on top big dark blobs burned
Like a plate of eyes. Our hands were peppered
With thorn pricks, our palms sticky as Bluebeard's.

#31Reasons  #NoToMoreSlashAndBurn
Sign the petition and help Save Our Hedges!

31 Days, 31 Reasons – Day28  Less to forage

"Late August, given heavy rain and sun
For a full week, the blackberries would ripen". Seamus Heaney's poem Blackberry Picking reminds us of the importance of a sensory contact with nature and her fragile bounty.

Hedgerows are a source of foraged food for humans as well as wildlife.

Blackberries, elderberries, sloes (for sloe gin), rose hips and hazelnuts are part of the hedgerow harvest. Cutting hedges early in the season strips them of their fruit and the crop is lost to people and nature.
31 Days, 31 Reasons: #29  
Increasing the Risk of Spreading Ash Die-back (Chalara)

Sign the petition and help Save Our Hedges! 
#31Reasons  #NoToMoreSlashAndBurn

31 Days, 31 Reasons – Day29  Increasing the risk of spreading Ash-Die Back Disease

Chalara or ash dieback, is a disease of ash trees caused by a fungus called *Hymenoscyphus fraxineus*. Chalara causes leaf loss, crown dieback and bark lesions in affected trees. Once a tree is infected the disease is usually fatal. The spread of Chalara will be detrimental to farmers, foresters and the environment. Ash is present in over two-thirds of hedgerows.

Chalara has decimated Ash populations across Europe. Since Ireland has less diversity in its native tree species than other parts of Europe losing our ash will be a bigger blow here.

Some key facts:

The disease is spread by spores, mainly dispersed by wind but can be spread by dispersal of infected plant material. Risk of spread is increased by management and movement of management machinery.

There is a low probability of dispersal on clothing or animals and birds

Spores are unlikely to survive for more than a few days

Spores are produced from infected dead leaves during June to September

Hedge cutting in August increases the risk of spreading the spores as hedge-cutting machinery moves material along the hedge, then from hedge to hedge on the farm and then on to the next farm. How many hedge-cutting contractors clean their machinery when moving from one hedge to the next or from one farm to the next?

Reducing management activity in August and September would make sense if we want to try and restrict the spread of this disease; not changing the law to permit increased activity. Also, August and September are a good time of year to undertake surveys. Cutting hedges during these months reduces the potential for identifying the disease.
Less forage for livestock

Livestock browse as well as graze. They eat leaves as well as grass. In the autumn, when grass growth has slowed down and some of the nutrient value (the 'bite') has gone from the grass young, annual growth on hedgerows can provide a supplementary food source. If hedges are cut in August this opportunity has been removed. In the UK Ted Green uses tree hay (dried leaves and twigs) to feed cattle in winter. http://www.farming.co.uk/news/article/6111 https://www.youtube.com/watch?v= _GAR1FN-qwc

Researchers in the Netherlands and USA are looking at the benefits of feeding tree and shrub forage to high yielding dairy cattle; for example the protein levels from Rubus spp (blackberry, etc.) are given as 15-21%.

Hedges should be seen as a complimentary part of farming systems not a nuisance that needs to be cut back at the earliest opportunity.
31 Days, 31 Reasons: #31
August is Nature’s Harvest Season

The farmers that are pushing for the changes to the Wildlife Act claim, quite rightly, that August is a busy month for farmers; but it is a busy month too for nature. The season of ‘Mists and Mellow Fruitfulness’ is a critical time for Wildlife. Plants are completing their annual cycles, seeds are being dispersed, fruit is forming; many species of bird and animal are building up their energy reserves from nature’s autumn bounty to help them survive the winter or to sustain them on their long migration to their winter destination.

The purpose of the Wildlife Act is to protect the interests of Wildlife. Changes to the Act should not be made to accommodate farming unless it can be shown that this will not impact negatively on Wildlife – in the case of the changes proposed by Minister Humphries this is clearly not the case.

When the Wildlife Act was initiated in 1977 the ‘open season’ for hedge cutting was 8½ months (Mid-April to the end of July) and the ‘closed season’ just 3½ months. In view of declining bird populations this was amended in 2000 to 6 months ‘open’ and 6 months ‘closed’. This was a compromise between the needs of wildlife and the practicalities of farming and contractors’ business needs. If it were just a case of protecting wildlife the ‘open’ season would probably run from the middle of November to the middle of January – no longer.

The Minister, in the Seanad, talked about a “fair and balanced system”. The balanced system in respect of hedge cutting dates was introduced in 2000 with the Wildlife (Amendment) Act. The proposed changes will re-introduce an imbalance in favour of land managers and against nature.

No evidence has been presented by the Minister to explain how these changes can be introduced without compromising nature. She is offering the farmers an omelette yet claiming that no eggs will need to be broken!