

REF: 2015S40/0068

From:

Sent: 09 January 2015 01:56

To: Nature Conservation

Subject: Review of section 40

To whom it may concern, this is my submission re. Review of section 40. I have attempted to keep it concise and to the point.

I do not think that there should be any amendment to the present arrangements because as a farmer I do not consider them too onerous to comply with.

I think that some of the issues raised could be sorted by resolving land designation issues. This relates to the DAFM interpretation of the Single Farm Payment Scheme, where scrub areas are excluded from payment. This is a big issue where land has not been designated as habitat rich area. Many farmers have to destroy scrub to get their payment. This is totally contradictory!

Hedge cutting is not an issue as there can be no reason for not cutting a roadside hedge in January or February, there is no trafficability issue. If there is excessive growth as we saw this past year, it was easy to cut back any dangerous growth by hand. Birds are nesting earlier and earlier. I do not allow hedge cutting in the Autumn due to the abundance of feed for many creatures and so I cut in February. A bigger problem that I see in North Kerry is that the traditional skills for hedge cutting have gone. A lot of farmers are obliterating the hedging down grass level, for an easy life and thus obliterating any habitat. This skills shortage needs to be addressed.

Burning again raises the argument for reclassification of these areas into habitat status. Also the need to train farmers in the old traditional methods for controlled burning of gorse. Also burning gorse in April is self-defeating as it propagates seeds and opens up the ground for the seed dispersal. Burning at this stage means that the habitat is destroyed for the summer ie. the whole breeding season and can be linked to the decline in songbirds, meadow pipit and skylark. Along with many other species.

No exceptions should be made to the present rules without a full independent scientific assessment being undertaken.

If you need me to clarify anything, please ask.