Review of Section 40,
Department of arts heritage and the Gaeltacht,
7 Ely place,
Dublin 2.

A Chara,
Glenflesk is an extensive rural parish in east Kerry. While it has a big land area much of this land would be classed as mountain or upland.

For generations the farmers managed and farmed these mountains with sheep grazing and controlled systematic burning of relatively small areas on an annual basis. Since the year 2000 when the laws governing the burning were changed, the starting date of the closed season from the 15\textsuperscript{th} April back to 1\textsuperscript{st} March it created an impossible situation for these farmers. Grazing conditions disimproved year on year due to increased cover of overgrown material that should have been cleaned off.

We are including a short paragraph from an article which was in the Irish independent 20\textsuperscript{th} of December 2014 by Professor John Sweeney N.U.I. Maynooth. He points out that the rainfall on the mountains in the West of Ireland can be four times that of parts of the East. Also the number of days that rain may fall is 225 in the West as against 150 in the East. This should explain why it is virtually impossible to get conditions suitable to do systematic controlled burning within the present laws.

The situation got so bad in 2010 when conditions got extremely dry in April after a prolonged dry period, serious uncontrollable wild fires started and spread over a wide area in a very short time. This wild fire burned for several days and made the headlines in the national media. The fire affected several townlands and resulted in severe financial loss to farmers on two fronts.

1. Several kilometres of fencing were totally destroyed. It costs €5.00 plus per metre to replace these fences.
2. Areas which would have provided fodder for livestock for the winter ended up completely barren and many farmers had to purchase alternative feed at a serious expense.
If the laws governing the burning of these areas were sensible and practical all these situations would have been avoided. It is imperative that the burning season is extended to 15th April to facilitate the management of these areas and get them back to a healthy agricultural and environmental condition.

As sheep farmers we are traversing the mountain on a regular basis. Since the closed season was extended to date from the 1st of March to 31st of August, we observed that the grouse population was declining year on year due to deteriorating state of the mountain. The area with heather at the optimum stage of growth was getting smaller until 2010 when wild fires destroyed vast areas. As a result of that fire four years later much of this area has rejuvenated and are ideal for grouse, we can see this year 2014 that grouse numbers are increasing in numbers again. This tells us that we should mirror this practice in Scotland where they burn small areas annually and are allowed do it up to 15th of April.

**Hedge cutting:**

Dates for hedge cutting should be changed that the open season would start on 1st August to facilitate working in better weather conditions.

**Burning of vegetation:**

a) No. The present dates are not environmentally friendly.

b) Yes. Hedge cutting is not dependant on weather conditions while burning cannot be carried out until conditions are dry.

c) In our area the enclosed land and unenclosed land are similar therefore the same rules should apply.

_d)_ We don’t see the need for derogations if the burning season is extended to 15th April.

e) Changing dates by ministerial order could prove problematic and cumbersome unless it could be achieved by a phone call.

Signed: [Signature]
Sean O Donoghue, Chairman.

Signed: [Signature]
Denis O Donoghue, Secretary.
European context.
The interaction between the topography and Atlantic airflows produces a classic west to east decline in rainfall with some parts of the western mountains receiving over 3,000mm annually while sheltered areas of the east coast only get around 750mm. Despite our perception, it only rains 6.5pc of the time in eastern parts of Ireland, though rain may fall on 150 days of the year, and up to 225 days in the west.

Irish Independent 20/12/14
Part of article by Professor John Sweeney
Curator at the Geography Department of NUI Maynooth