



# Irish Red Grouse Association Conservation Trust Limited



Reference: **Submission to the Review of the Legislative Controls  
on Burning and Hedge Cutting under  
Section 40 of the Wildlife Acts 1976 to 2000**

Date:

## **Introduction.**

The **Irish Red Grouse Association Conservation Trust Ltd. (IRGACT)** is a registered Charitable Trust Company, established in 2010, and dedicated to the management of moorland and lowland heaths for the sustainability of the iconic Red Grouse and other moorland breeding birds. The IRGACT is growing rapidly and currently supports 42 project sites extending over 40,000 Hectares.

In response to the published Consultation Document **we propose that a distinction be made between Hedgerows and Scrubland as defined in the legislation.**

We recognise that hedges and ditches are a unique feature of our landscape and in the absence of extensive afforestation they provide invaluable edge habitat for an extensive range of flora and fauna. We welcome the new criteria applied in the new Single Farm Payment Scheme for the protection of these hedgerows.

The moors and heaths of Ireland were managed and shaped by our farming ancestors, since the ice age, while they progressively cleared the forests and scrub for an expanding farming food resource.

This farming activity was, and still is, beneficial to Grouse and other moorland breeding birds, such as the Hen Harrier, Twite, Golden Plover, Lapwing, Curlew, Meadow Pipit, and Sky Lark together with the Mountain Hare.

If left unmanaged for any period of time these habitats will revert back to scrub consequently we welcome the initiative under the new Single Farm Payment and associated GLAS Scheme to retain these habitats in a 'grazable' condition.

With reference to the questions raised in the Consultation paper under the headings:

## **1. Hedge Cutting.**

**We propose that the closed period for hedge cutting be retained as defined in the legislation with exceptions to allow farmer to cut hedges for fencing and stock proofing purposes.**

**We also propose that hedges, except roadside hedges, should not be cut lower than 2 mt in height as hedgerow nesting birds prefer to build nests at least 1.5 mt from ground level and 1/3 mt from top of hedge to afford them maximum protection from ground and aerial predators.**

Company Registration No: 53533 Registered Charity No: CHY 21227

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**Chairman:** V. Flannelly **Hon. Secretary:** T. Dunne **Hon. Treasurer:** J. Fitzharris **Executive:** B. Barton, D. Butler, W. Cronin, K. Kyne, J. Leech, J. O' Halloran, S. O'Neill, P. O'Sullivan, L. Plant, W. Phelan, D. Ryan, J. Sheridan.



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Reference: 2 **Burning of Vegetation.**

Date:

**A. The burning of vegetation on moorland and heaths should be extended to March 31<sup>st</sup>** for the following reasons:

- (a) It is safer to burn in the springtime as the underlying peat and soil is damp and the burn will be less intense and at a lower temperature.
- (b) It is not practical to burn in the autumn as the livestock are still on the land, the vegetation is dense and the risk of damage to the underlying soil or peat is greater.
- (c) The climatic conditions in March are usually better than January or February for a successful burn.
- (d) There is no evidence of moorland breeding birds nesting before Mid April.
- (e) Recreational users are more active on the moors during the autumn.
- (f) Autumn burning is very disruptive to the Red Grouse which is the only Irish bird species that is totally dependant on heather for its survival.

**B. We propose a different closed period for burning of moorland as distinct to hedge cutting.** Hedges are associated with lowland habitats and are used by different species, such as wrens, thrushes, and blackbirds for nesting.

**C. We propose that different rules apply to enclosed land versus unenclosed lands.** Enclosed lands are associated with active farmland whereas unenclosed lands are associated with commonages on bogs and moors.

In all cases we anticipate that under the Single Farm Payments Scheme all these lands will be subject to a Management Plan approved by the Dept. of Agriculture.

**D. We propose that derogation be introduced for burning moorland and vegetation during the closed period** for purposes related to a farming activity such as land reclamation and/or a specified habitat project.

**E. We propose that a Statutory Instrument be allowed in the legislation to extend the burning period in any particular year to April 15<sup>th</sup>** where there was no weather suitable for burning during the previous January, February or March.

29<sup>th</sup> December 2014

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