



Kilcatherine, Eyeries, County Cork
<http://www.friendsoftheirishenvironment.org>

Minister Brendan Smith TD
Minister for Agriculture, Fisheries and Food
Department of Agriculture
May 21, 2010

info@agriculture.gov.ie

Re: Wildfires: Scrub/Transitional Woodland Scheme

Dear Minister;

We write with a proposal to address the wildfires that have caused such economic, social, and environmental damage across the countryside.

We understand that in February 2010 recipients of the Single Payment Scheme were instructed to identify and exclude from the 'utilisable areas' claimed under this Scheme 'ineligible areas' by drawing a red line around them. Ineligible areas were defined as containing a building, farmyard, dense scrub, quarry, etc. They include areas where hedgerows have extended into fields.

A direct result of this has been that farmers are now justifying burning as a management tool required for economic reasons.

However as you will be aware burning has become an increasing economic and social problem itself in rural Ireland. The build up of wildfire fuel has been caused primarily by the decline in rural life, the delinking of stocking rates with payment rates, and, farmers claim, by the limiting of the annual period available for managed burning under the Wildlife Act 2000. Climate change also threatens to dry out Ireland's peatlands to the point where furze will readily take root and gorse fires become a more serious menace.

Coillte Teo. estimates that so far this year 350 fires have destroyed more than 1600 acres of their forestry with the private sector losing a similar amount. The value of the loss to Coillte alone is estimated at between €2 and €13 million, depending on the age of the plantation.

Environmentally wildfires are damaging to wildlife and can lead to severe erosion through loss of vegetative cover and soil structure.

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Without any permit system or requirement for farm burning management plans, the damage from wildfires potentially threatens not only the environment but the lives of both residents and fire fighters, including those at risk because fire fighting appliances are occupied at remote locations and so can not respond as quickly to other emergencies.

Although burning has traditionally been used as a management tool to keep land open, it has adverse environmental impacts. Aside from the impact on birds and wildlife, the land is eroded by heavy rainfall on soils exposed by these fires. The burning contributes to carbon emissions and is illegal under the Air Pollution Act 1987 as it is 'injurious to public health', has 'a deleterious effect on flora or fauna', and may 'damage property, or impair or interfere with amenities or with the environment'.

We attach a submission that we have made to the Forest Service Review of Grant Schemes on 27 April 2010 suggesting that transferring scrub to a forestry Scrub/Transitional Woodland Scheme would increase the forest estate and avoid the need for the burning and 'reclamation' of these small areas of relatively high biodiversity.

Scrub is included within the definition of forest cover used by Ireland in our National Forest Inventory. It comprises 4% of the total forested area with some counties holding 15% of their forested area in scrub. It is of substantially higher biodiversity value than arable land or conifer plantations and can provide a renewable source of energy as well as valuable carbon sequestration.

Transferring the areas identified for exclusion under the Single Payment Scheme as scrub and funding them instead through the Forest Service Scheme would remove the economic advantage that is in part at least driving the current outbreaks of expensive and damaging wildfires while protecting farmer's incomes in these difficult times.

We would be most grateful if you gave this matter your consideration.

Respectfully yours,

Tony Lowes

On behalf of

An Taisce; Bat Conservation Ireland; BirdWatch Ireland; CELT; Feasta; Forest Friends; Friends of the Earth; FIE; Grian; Hedge Layers Association of Ireland; Irish Natural Forestry Foundation; Irish Seed Savers; Irish Wildlife Trust; Just Forests; Native Woodland Trust; VOICE; Woodlands of Ireland; Sonairte