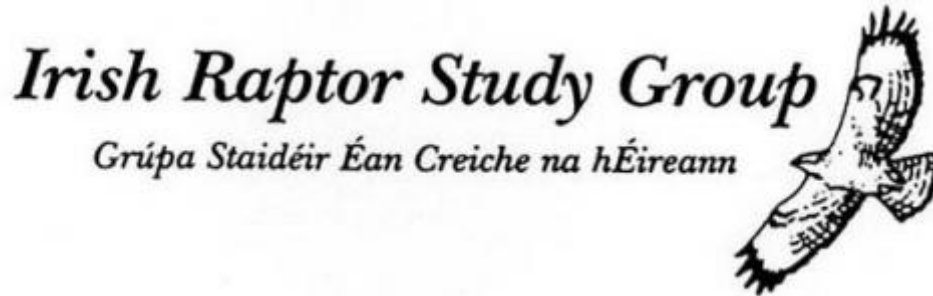


HEN HARRIER

THREAT RESPONSE PLAN



Irish Raptor Study Group (IRSG), Ardpatrick, Kilmallock, Co. Limerick,
Republic of Ireland | Tel: +353 (0) 873117608 | chairman@irsg.ie |

Consultative Committee Submission

May 2015

Hen Harrier Threat Response Plan: IRSG overview

The Irish Raptor Study Group (IRSG) is a NGO dedicated to monitoring raptor populations in the Republic of Ireland (Mee 2012). The IRSG has had a long-standing interest in monitoring hen harrier populations and has carried out harrier survey work in south-west Munster since the late 1990's, and is one of the three bodies coordinating the 2015 national survey for the National Parks & Wildlife Service (NPWS) in partnership with BirdWatch Ireland (BWI) and the Golden Eagle Trust.

Status of Hen Harriers in Ireland

Hen harrier populations in Ireland now breed predominately in forested landscapes. However, existing (and shrinking) open non-forested habitat remains important both for nesting and foraging. Today Hen Harriers are one of our rarest breeding birds numbering 128-172 breeding pairs in the last national survey in 2010 (Ruddock et al. 2012). Harriers are listed on Annex 1 of the EU Birds Directive and are Amber-listed in the most recent Birds of Conservation Concern in Ireland (2014-2019).

Six Special Protection Areas (SPAs) have been designated for hen harrier conservation in the Republic of Ireland. Three other important sites were listed for designation as SPAs as these held significant populations of harriers in 2005 (the reference year for HH designation) but have never been designated despite the continued importance of these sites. Although overall numbers between the last two survey years (2005-2010) appear to show population stability at a national level, serious declines have been recorded in some important sub-populations (eg. Mullaghareirks). The most recent national survey showed an overall and alarming 18% decline across the six SPAs (see Ruddock et al. 2012).

Hen Harrier and Forestry

As most of our hen harriers both within and outside SPAs now breed in heavily afforested areas, they are clearly vulnerable to changes in the forest matrix of habitats. Most fundamental is the fact that all such forests in effect become unusable for harriers once they reach 10-12 years old. Thus forests are of little use to harriers for nesting or foraging for 20-30 years of the forest cycle until the harvested area is replanted or left fallow.

The UCC Coford report (Irwin et al. 2012) "Optimum scenarios for Hen Harrier conservation in Ireland" is often quoted out of context by referring to one sentence in its executive summary, ie, that the overall effects of afforestation is a positive one for hen harriers. However a closer reading reveals some key findings: Firstly that all populations declined over the 5 year study period; secondly that breeding success declined in 2nd rotation forestry; and thirdly and perhaps most critically, the UCC report identified a maximum threshold of 40% forest cover (including 10% pre-thicket and >30% suitable open habitat) for the long-term viability of hen harrier populations.

None of the six SPAs meet these criteria. The overall forest cover across the SPAs is some 52% compared to the national figure of 11%. Most new forestry is likely to be second rotation which has been shown to be sub-optimal for harriers (Wilson et al. 2012). Thus it has been shown that afforestation results in a net loss of habitat to harriers. Given the proven negative impacts of forestry on Hen harrier, the IRSG considers that any future afforestation in Hen Harrier SPAs cannot fulfil the environmental standards expected from Forest Stewardship Council (FSC) certification and should not be FSC certified.

IRSG supports the recommendation in the UCC report to minimise flux in the availability of forest growth stages “by ensuring a consistent matrix of different aged stands” thus avoiding periods when there is little suitable aged forest for nesting (Irwin et al. 2012). Not only would this require forest-scale management for harrier conservation as well as for timber production, the primary objective of forest management, but this would also require integrated planning to include open moorland and adjacent farmland critical for harriers. In Ireland the harriers main prey species, principally small songbirds such as the meadow pipit and skylark are also red and amber listed because of alarming population declines associated with loss of the open moorland habitat to afforestation and agricultural intensification (Colhoun & Cummins 2013). Other bird species of conservation concern (eg. Red Grouse, Golden Plover, Curlew) are also at risk due to loss of their open heath and bog habitats.

Hen Harriers and Agriculture

Thus, the IRSG supports long-term planning including agri-environment supports to farmers to maintain extensive, traditional farming practices beneficial to breeding harriers. To deliver real benefits for harrier conservation farmers need realistic environmental supports and longer-term planning that the 4-5 year Rural Development Programme cycle to provide security. Such supports are unlikely to match the incentives available through forestry grants. However, once planted this land is taken out of agricultural production. We are disappointed at the time taken to instigate the new hen harrier measures under the GLAS scheme. Moreover we are very disappointed with the measures under GLAS, which we believe stand to deliver few if any benefits to harriers. Furthermore, of €528 million earmarked for farmers in Natura 2000 sites under Measure 213 of the last CAP only some €90 was delivered. This resulted in NPWS having to plug the gaps in payments using scarce national exchequer funds for essential Farm Plan schemes such as that for the hen harrier rather than the Measure 213 payments which are 75% EU funded.

Inconsistent land eligibility rules from the DAFM have also contributed to widespread degradation of heath and moorland through uncontrolled burning with detrimental effects on Hen Harrier breeding habitat. It is hoped that the recent clarification regarding eligibility (see below) will end this anomaly and better protect key habitat for Hen Harriers such as heather moorland:

"With regard to Natura lands, such areas which were declared on a 2008 SPS application and which gave rise to payment and parts of which had become ineligible due specifically to the SPA or SAC limitations imposed under the management plan will be eligible for payment."

A Guide to Land Eligibility; Direct Payment Schemes 2015:<http://www.ifa.ie/.../Guide-to-Land-Eligibility-booklet-April...>

However, recent DAFM farm inspections in three commonages in the Slieve Aughties (Roxborough, Keelderry and Derrybrien) resulted in reductions in the reference areas on these commonages ranging from 55-87% due to perceived issues of under-utilisation despite stocking in accordance with Commonage Framework Plans and maintenance in GAEC (reversed for two sites following lobbying by the INHFA). The IRSG strongly believes there is no ecological or social basis for such reductions. The maintenance of such commonages in GAEC and at low stocking rates in accordance with CFPs, and benefitting the wider ecology of such commonages including breeding harriers, should be supported.

Hen harriers and Wind Energy

Wind farms have become an additional factor in many of the key harrier breeding areas including the SPAs. The SPAs already hold some 300 wind-turbines with many more planning applications already approved or in train. While collision risk is an obvious and well documented mortality factor for raptors, displacement and/or disturbance associated with construction and operation of windfarms are important additional pressures on nesting hen harrier (Pearce-Higgins et al. 2009). Harriers either move to avoid windfarms or may avoid turbines during breeding and foraging flights. Thus with more and more windfarms planned for the uplands including within harrier SPAs, wind energy places an additional pressure on harriers trying to find space to nest and find food in an increasingly crowded and deteriorating environment. Siting of future wind-farms away from key areas for hen harriers should be a priority and it is hoped that the recent "bird sensitivity mapping" project undertaken by BWI will greatly help facilitate future planning.

Summary

The legal basis for the HHTRP is established in Regulation 39 of the Birds & Natural Habitats Regulations 2011 (SI No. 477), the objectives of which are to develop and implement an appropriate threat response plan to cease, avoid, reverse, reduce, eliminate or prevent the threat, pressure, hazard, combination of threats, pressures or hazards, adverse effect, pollution, deterioration or disturbance.

Hen harrier conservation in landscapes that are of considerable value and use for forestry, agriculture, wind energy and other land uses including public recreation presents many difficult challenges. The HHTRP has the potential to be an important tool for integrating management for the long-term conservation of harrier populations both within and outside the SPAs. From the perspective of hen

harrier conservation, which we believe should be at the core of the HHTRP, further afforestation within the harrier SPAs would be detrimental to the species long-term viability and run counter to the principles embodied of Forest Stewardship Council certification.

Two sites removed from the list of cSPAs still hold nationally important harrier population: namely Ballyhouras (9% in 2010), and Nagles (6%). Two other sites also hold significant populations based on 2010 survey data: Slieve Rushen (8%), north & west Clare (9%). Only 45% of the national total of HH pairs is protected within the SPA network. The focus and objectives of this HHTRP should equally apply to populations outside this network.

Realistic and deliverable supports for traditional family farming in the harrier SPAs which maintain and/or enhance harrier populations should be a priority. Future wind-energy developments should be located away from key hen harrier breeding areas. The IRSG is willing to work with all agencies and stakeholders to make this TRP a success. It is critical that it delivers on its promise.

References

- Colhoun, K. and Cummins, S. 2013. Birds of Conservation Concern in Ireland 2014-2019. *Irish Birds* 9: 523-544.
- Irwin, S., Wilson, M., O'Donoghue, B., O'Mahony, B., Kelly, T. and O'Halloran, J. 2012. Optimum scenarios for hen harrier conservation in Ireland. Coford, Final Report to DAFM.
- Mee, A. 2012. An overview of monitoring for raptors in Ireland. *Acrocephalus* 33: 239-245.
- Pearce-Higgins, J. W., Stephen, L., Langston, R.H.W., Bainbridge, I.P. and Bullman, R. 2009. The distribution of breeding birds around upland wind farms. *Journal of Applied Ecology* 46: 1323-1331.
- Ruddock, M. & Dunlop, B.J., O'Toole, L., Mee, A., Nagle, T. (2012) Republic of Ireland National Hen Harrier Survey 2010. *Irish Wildlife Manual*, No. 59. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht, Dublin, Ireland.
- Wilson, M., O'Donoghue, B., O'Mahony, B., Cullen, C., O'Donoghue, T., Oliver, G., Ryan, B., Troake, P., Irwin, S., Kelly, T.C., Rotella, J.J. and O'Halloran, J. 2012. Mismatches between breeding success and habitat preferences in Hen Harriers *Circus cyaneus* breeding in forested landscapes. *Ibis* 154:578-589.