

## Submission to the Joint Oireachtas Committee on Climate Action from BirdWatch Ireland

BirdWatch Ireland respectfully requests that the Joint Oireachtas Committee considers the recommendations in this submission in their forthcoming report on Climate Action. Action to significantly reduce greenhouse gas emissions in Ireland is urgently required in order to stem the worst impacts of climate change. Climate change is anticipated to affect all levels of biodiversity, from organism to biome levels (Bellard et al 2013<sup>1</sup>, Pereira et al 2010<sup>2</sup>) including our birds. Birds are indicators of the health of the environment but in Ireland the number of birds of serious conservation concern is at its highest ever<sup>3</sup>. One third of Ireland's wild bee species are threatened with extinction<sup>4</sup>. 91% of Ireland's internationally important habitats have bad or inadequate ecological status<sup>5</sup>. Habitat loss and degradation caused by human activities are the main causes of impacts. **Climate actions which also protect and restore habitats will provide valuable co-benefits for our threatened wildlife.** Nature-based solutions will help create landscape resilience in the face of climate change. We make the following recommendations:

- 1. Climate actions must be proofed** to ensure that they are consistent with both Ireland's targets under the UN Convention on Biological Diversity and those of the United Nations Framework Convention on Climate Change. Climate mitigation and biodiversity protection and restoration are complementary, but that this is not inevitably the case and proofing is needed to ensure that both goals are pursued.
- 2. Conserve and restore peat habitats and soils:** Citizen's Assembly Recommendation 7 relates to the cessation of peat cutting and government subsidies to be directed towards peat bog restoration including rewetting of bogs. We fully support this proposal as it would have significant benefits for birds of our upland blanket bogs and lowland raised bogs including the globally threatened Curlew. Agriculture and afforestation policy and poor implementation of the laws protecting biodiversity on upland and lowland farms can also result in negative impacts to peat habitats and peat soils. We recommend that the Department of Agriculture supports financially rewarding agri-environment schemes in the forthcoming Common Agriculture Policy Strategic Plan and agriculture payment conditionality rules that support protection of peat habitats and soils in a farmed environment. The latter ties in with **Recommendation 11** where the Citizen's assembly called for rewards for the farmer for land management that sequesters carbon. Critically, restoring the proper functioning of peatland habitats would assist in slowing runoff which could help with flood protection in lowland areas.
- 3. Sequester and store carbon through hedgerows:** It is estimated that 450 kHa or 6.4% of the Irish landscape is comprised of hedgerow, scrub and non-forest trees<sup>6</sup>. Hedgerows and their associated trees, banks, ditches and margins provide a precious multi-functional resource in our countryside, benefiting *inter alia* plants and wildlife, agriculture, water quality, flood mitigation, tourism and the general community through their landscape value. They provide essential food, shelter and corridors for wildlife. They also have potential to help mitigate climate change by sequestering carbon in woody biomass and in soil. EPA research suggests that hedgerows and non-forest woodlands could potentially sequester 0.66–3.3t CO<sub>2</sub>/ha/year<sup>7</sup>. Data from 17 County Hedgerow Surveys indicate that **only one third of hedgerows are in a favourable conservation state** leaving potential for greater carbon sequestration & storage potential through an improved quality stock while supporting wildlife. **We recommend the completion of the National Hedgerow Survey and convening of a National Stakeholder Forum to develop a National Hedgerow Conservation Strategy to maximise the carbon and biodiversity co-benefits of Ireland's unique hedgerows.**

<sup>1</sup> Bellard, C. et al., 2012. Impacts of climate change on the future of biodiversity. *Ecology letters*, pp.365–377

<sup>2</sup> Pereira, H.M., Leadley, P.W., Proenca, V., Alkemade, R., Scharlemann, J.P.W., Fernandez-Manjarres, J.F. et al. (2010). Scenarios for global biodiversity in the 21st century. *Science*, 330, 1496–1501

<sup>3</sup> Colhoun K. & Cummins, S. 2013 Birds of Conservation Concern in Ireland 2014-19. *Irish Birds* 9:523-544 & available here <http://www.birdwatchireland.ie/LinkClick.aspx?fileticket=WpxRLyuI9cA%3d&tabid=178>

<sup>4</sup> All-Ireland Pollinator Plan 2015-2020. National Biodiversity Data Centre Series No. 3, Waterford

<sup>5</sup> DAHG 2014. Ireland's Fifth National Report to the Convention on Biological Diversity. Department of Arts, Heritage and the Gaeltacht.

<sup>6</sup> Green, S., The Irish Hedge Map Teagasc 2010. Department of Agriculture Food and the Marine [https://www.teagasc.ie/media/website/publications/2010/The-Irish-hedge-map-version1\\_5690.pdf](https://www.teagasc.ie/media/website/publications/2010/The-Irish-hedge-map-version1_5690.pdf)

<sup>7</sup> Black et al(2014) Carbon Sequestration by Hedgerows in the Irish Landscape, EPA, Wexford available here <http://www.epa.ie/pubs/reports/research/climate/ccrp-32-for-webFINAL.pdf>

- 4. Improve the Biodiversity Co-benefits of Afforestation.** In relation to the **Citizen’s Assembly recommendation 13** recommending supports for afforestation. Forestry can provide biodiversity co-benefits if the right trees are planted in the right place under the right management. Currently, afforestation is a significant pressure and threat to biodiversity<sup>8</sup> especially when it occurs on land that was biodiversity-rich prior to planting<sup>9</sup>. Currently, there is no ecological assessment of afforestation applications outside of EU designated sites. Biodiversity-rich areas are being lost to an unsustainable forestry model. This must be rectified to protect ground nesting birds, pollinators and species rich grasslands. We recommend that **ecological assessment is undertaken of all afforestation applications.**
- 5. Explore the synergies between climate change mitigation potential of blue carbon while protecting habitats.** Marine ecosystems provide an important role in climate regulation. The possibilities and potential of the ‘blue carbon’ of our marine and coastal habitats in Ireland should also be explored with the view to maximising carbon sequestration and storage benefits but critically ensuring the protection of coastal ecosystems for the benefit of biodiversity. The EPA has undertaken research on the role salt marshes, sand dunes, bays and estuaries play in relation to carbon mitigation<sup>10</sup>. Programmes such as the Blue Carbon Initiative and similar<sup>11</sup> provide additional information. Critically, many of Ireland’s Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) for birds are designated due to these important habitats but they have ‘bad’ conservation status due to habitat degradation and pollution. Protection and restoration could have multiple benefits. Terrestrial coastal habitats also have a very important role in climate change adaptation buffering the hinterland from storm and flood events.
- 6. Ensure coherence across government policies and strengthen enforcement of environmental laws to achieve climate goals with biodiversity co-benefits.** Sectoral policies, plans, programmes, schemes and laws relating to, but not limited to, agriculture, forestry, flood protection, renewable energy, the marine, tourism, and biodiversity all need to be heading in the same direction to meet climate goals and to protect habitats which support them. There could also be significant wins in terms of reaching our climate goals if our existing suite of environmental laws and regulations governing habitats were implemented and enforced effectively. Indiscriminate hedgecutting and hedgerow removal in the countryside is the number 1 complaint to BirdWatch Ireland from members of the public despite laws in place to prevent this occurrence. The thresholds to trigger Environmental Impact Assessment for forestry and activities on farmland are too high and resulting in significant loss of habitat. Failure to regulate burning in the uplands results in significant impacts to peat-based habitats every year. Over 21,400ha of Natura land (SACs and SPAs) have been burnt between 2011-2016<sup>12</sup> releasing carbon into the atmosphere, degrading habitats, impacting on the species supported by these habitats like Hen Harrier and Curlew who breed in the uplands and stymying our goals to achieve favourable conservation status of these habitats as per the Habitats Directive. The cost to the exchequer to deploy the fire service to attend out-of-control fires in upland mountains and lowland hills between 2010-2015 in 10 counties was €6.1million<sup>13</sup>. Finally, awareness needs to be raised with the general public, farmers and competent authorities of the value of habitats for both biodiversity and climate benefits.

**Contact: Oonagh Duggan-Assistant Head of Policy and Advocacy, BirdWatch Ireland,**  
[oduggan@birdwatchireland.ie](mailto:oduggan@birdwatchireland.ie)

<sup>8</sup> DAHG 2014. Ireland’s Fifth National Report to the Convention on Biological Diversity. Department of Arts, Heritage and the Gaeltacht.

<sup>9</sup> Graham, Conor.T.; Wilson, Mark W., Gittings, T., Kelly, Thomas C., Irwin, Sandra; Quinn, John; O’Halloran, John., (2015) Implications of afforestation for bird communities: the importance of preceding land-use type *Biodiversity Conservation*, DOI 10.1007/s10531-015-0987-4.

<sup>10</sup> Norton et al (2018) Valuing Ireland’s Coastal, Marine and Estuarine Ecosystem Services, EPA, Wexford, available here

[http://www.epa.ie/pubs/reports/research/water/Research\\_Report\\_239.pdf](http://www.epa.ie/pubs/reports/research/water/Research_Report_239.pdf)

<sup>11</sup> <http://thebluecarboninitiative.org/>

<sup>12</sup> Data from Irish Government reports to European Forest Fire Information System, Forest Fires in Europe, Middle East and North Africa 2016. EUR 28707 EN, Publications Office, Luxembourg

<sup>13</sup> BirdWatch Ireland research undertaken through Freedom of Information requests to local authorities.