

BirdWatch Ireland Statement to the Oireachtas Joint Committee on Agriculture and the Marine on Ireland's CAP Strategic Plan 2023-2027

Delivered by Oonagh Duggan, Head of Advocacy, BirdWatch Ireland, Wednesday February 9th 2022

Thank you Chair, deputies and senators for inviting BirdWatch Ireland to speak today. BirdWatch Ireland is a charity with 15,000 members and 25 branches nationwide. We have offices in counties Wicklow, Offaly, Donegal and Mayo. Our mission is to protect wild birds and other biodiversity. We do this through surveys and monitoring which relies on over 700 skilled volunteers, education, awareness raising and events, habitat and species projects both in and off our network of nature reserves and policy and advocacy to press for the changes needed to address the biodiversity emergency.

We have a long history of working directly with farmers and supporting them in conservation actions for threatened wild bird species. We also work closely on agriculture policy which is the biggest driver of biodiversity decline in Ireland but also on other issues affecting farmland birds such as for forestry, peat and climate change mitigation and adaptation.

For the record I am one of two Environmental Pillar representatives to the national CAP Consultative Committee which was established in May 2019.

Farming in Ireland over the millennia has shaped our wild bird profile but populations have declined sharply in the face of the dramatic changes in agriculture in the last 50 years. Farmland birds, like the Curlew, which are intimately linked to our heritage in song, music, poetry and stories are slowly, but surely, disappearing from the landscape, with some such as the Corn Bunting already gone.

Every six years BirdWatch Ireland publishes the Birds of Conservation Concern in Ireland assessment. We use a traffic light system with red identifying species of highest conservation concern. They are 16 farmland birds on the latest red list. Those are the birds of meadows including Corncrake, Meadow Pipit and Whinchat; birds of arable and mixed farmland Grey Partridge, Barn Owl, Yellowhammer, Stock Dove and Kestrel; birds of damp pasture Curlew, Snipe, Lapwing, and Redshank and birds of uplands and coasts Golden Plover, Dunlin, Red Grouse, and Twite. Farmland birds are the fastest growing bird group onto the red list from amber¹.

¹ Images of these species is included in the Appendix, copyright the photographers who donated their images for BirdWatch Ireland's use.

In addition, one third of our wild bee species are at risk of extinction and 85% of our internationally important habitats are in unfavourable condition. These include grasslands, heaths, fens and other wetlands. Species and habitats that rely on good water quality are also under pressure because water quality is declining. Agriculture is the biggest pressure and threat to these too. But farmers have a unique role in the conservation of biodiversity especially farmland birds and agriculture policy must, with its reach and funding, support them in this role.

Biodiversity in Ireland is in A & E. The emergency was declared by Dáil Éireann in May 2019. In order to tackle this emergency we need to act like it's an emergency. Farmers and conservationists are on the front line together on this and with the same determination used to tackle the Covid crisis, we can turn this around as long as urgent, effective and well-funded policies and actions are put in place.

The focus of Food Vision 2030 is a continuation of an intensification model with unambitious tweaks to address the environmental challenges in agriculture. The CAP Strategic plan 2023-2027 that was sent to the European Commission in December for review and approval includes some improvements for farmland biodiversity but it is not an emergency response. Ireland has the opportunity still to increase ambition.

Most importantly for biodiversity is targeting the funding and supports to where it is needed most. It is our view that between 2-5% of the €9.8billion Irish CAP budget will be spent on effective measures for biodiversity which is very weak. Much greater support and targeting of actions and funding is needed on all farmland especially high nature value farmland and pulling the brakes on the intensification model. Key changes needed in the CAP Strategic Plan are

- The land eligibility rule changes which would remove the threat of red lining of 30% of a parcel containing scrub and other habitats is good but it must be accompanied by an effective communications campaign to encourage farmers to retain these important habitats.
- The Space for Nature condition (GAEC 8) is good as it will apply to all farmland but small wetlands need to be added to the list of habitats and the forestry definition should apply to native woodlands only. Also, GAEC 8 requires retention of landscape features such as hedgerows. Irish farmers are allowed to remove hedgerows as long as the same length is replanted before removal. This is facilitating the removal of hedgerows and must stop. You cannot compare the biodiversity supported by old hedgerows with new whips. Retention of landscape features means keeping them.
- Farmers can choose to go to 10% Space for Nature on farmland in the ecoscheme but here is
 no requirement to improve the quality of these habitats and that is a major concern. Specialist
 ecological advice should be made available to help farmers improve the quality of hedgerows,
 ponds, wetlands and more. Unless there are measures for 'improvement' the state of nature
 will not change.
- The inclusion of an Agri-environment scheme measure and EIP for waders is positive but according to BirdWatch Ireland mapping of important areas for waders and based on our direct experience with the Curlew EIP, the budget for the EIP should be in the region of at least €30million to save this group of rapidly declining red list species.
- We welcome the proposed Cooperative Projects which builds on the results-based approach but the funding allocation should be significantly higher to ensure broader geographical scope.
- The ANC payment still has no linkage with environmental action and this is hugely regrettable.
 The Natura and Commonage AECM payments should also be linked to actions to support the conservation objectives of Natura sites and species.

Underpinning the CAP throughout is a requirement to adhere to national and EU environmental law. The most common breach of cross compliance is the Nitrates and Water Framework Directive. We really need stronger education and awareness campaigns of environmental law and its enforcement.

Like the Covid 19 crisis, the state chose to try and vaccinate everyone and not just 20% of the population. Partial, isolated and poorly funded measures will not solve the biodiversity emergency and they do a disservice to farmers who could have a good news story to tell, otherwise. We call on you deputies and senators to support the changes in Ireland's CAP Strategic Plan proposed here.

ENDS

Appendix 1: The following photos depict Ireland's current Red Listed Farmland Birds of Conservation Concern (Corn Bunting included which went extinct in Ireland around 2006)

































