



# IRISH TIMBER GROWERS ASSOCIATION

17 Castle Street, Dalkey, Co. Dublin, A96 AH57  
Tel: +353-1-2350520 Fax: +353-1-2350416  
Email: [info@itga.ie](mailto:info@itga.ie)  
[www.itga.ie](http://www.itga.ie)

## **Irish Timber Growers Association submission on Draft Threat Response Plan for the Hen Harrier 2024 to 2028**

19<sup>th</sup> February 2024

The Irish Timber Growers Association (ITGA) was established in 1977 and is the national representative body of private woodland owners in Ireland. The membership of the Association mirrors the wide range of different timber growers in the country and current membership includes farm forest owners, forestry co-operative members, native woodland owners, forestry investors and forestry pension funds. This wide range of membership allows the Association take a broad view of the industry and issues facing the sector.

The Association welcomes the opportunity to make this submission to the National Parks and Wildlife Service (NPWS) of the Department of Housing, Local Government and Heritage.

ITGA note and support the stated aim of the Hen Harrier Threat Response Plan 2024-28, inter alia *'to improve the long-term prospects for the species and to meet the objectives of the Birds Directive by - synthesising the key scientific evidence for the hen harrier population decline, - outlining the views and concerns presented by the relevant sectors, - laying out a coordinated set of targeted actions and measures to cease, avoid, reverse, reduce, eliminate or prevent the identified threats, pressures and hazards.'*

ITGA also note that, *'in accordance with the Regulations, the approach taken to develop and implement the Threat Response Plan with both the Inter-Departmental Steering Group and Consultative Committee was as follows:*

- *establish the threats that affect the survival of hen harrier,*
- *understand the context of the activities that may impact hen harrier, and the concerns of stakeholders affected (see Appendix 4),*
- *develop a shared understanding of conflicts and the conservation requirements of hen harrier,*
- *build a consensus on how to reach those requirements,*
- *set out and implement the necessary measures,*
- *monitor the outcomes'*

The Irish Timber Growers Association fully supports improving hen harrier populations and is dismayed by the findings of the most recent 2022 National Survey of breeding Hen Harrier in Ireland which outlines that the populations of five of the six Hen Harrier Special Protection Areas (SPAs) have declined by between 20% and 80% since 2007. The Association have constructively worked and engaged with the Hen Harrier Threat Response Consultative Committee over the many years since its inception.

ITGA and the wider forestry sector is of the view that the current forestry-related protection measures being enforced within SPAs in Ireland, including the cessation of afforestation and restrictions on forest operations, are obviously not delivering Hen Harrier conservation solutions and the Threat Response Plan must now consider and seek out alternative scientific approaches.

ITGA also note from the above stated approach taken by NPWS that successful conservation of the hen harrier in Ireland requires effective and meaningful consultation of all affected parties to ensure their buy-in to the process. ITGA has previously expressed its concern that this is not being achieved.

ITGA has long opposed the cessation of afforestation in the Hen Harrier SPAs, instituted in 2013, which on reviewing the most recent 2022 National Survey of breeding Hen Harrier in Ireland has now been shown to be entirely ineffective, and in fact disadvantages the survival of the Hen Harrier and has had equally catastrophic effect on the forestry sector.

Research has shown that where afforestation takes place in areas that were previously underutilised by Hen Harriers, it may increase the value of such areas to hen harrier in the long-term.<sup>1 2</sup> Studies have also shown that areas dominated by forestry remain suitable to hen harriers provided a mosaic of age classes is maintained, such that areas of young, pre-thicket forest are always available. This will generally be the case in larger forest catchments, particularly where private forestry dominates. It should be recognised that private forests now account for over half of our national forest estate, and with an average area of just 8 hectares, where active management of these small areas is facilitated, it will result in a patchwork of different forest stages which are shown to be ideal for the Hen Harrier.

The fact that the populations of five of the six Hen Harrier Special Protection Areas (SPAs) have declined by between 20% and 80% since 2007, evident from recent and past survey results, is testament to the negative and erroneous bias against forestry which is proving counterproductive. The survey results highlight that forestry has in fact contributed to improved population dynamics for the Hen Harrier. In the period since 2007, the population for only one SPA has increased (by 12%), the Slieve Bloom Mountains SPA, which has by some margin the highest proportion of forest cover in its SPA at 64%. ITGA note that the Slieve Blooms SPA has increased in Hen Harrier population over all surveys since 2007. While overall, the SPA populations have declined by more than half (54%) since 2007, the results show that forestry within the SPAs can improve population dynamics for the Hen Harrier. It is also of significance that the Mullaghanish to Musheramore Mountains SPA, which has the lowest forest cover at 34%, has shown, by some margin, the greatest reduction in Hen Harrier population at -80%.

These 2022 National Survey of breeding Hen Harrier in Ireland results are contrary to the Draft Hen Harrier Threat Response Plan proposals and suggest that lower forest cover can have a negative impact on Hen Harrier populations. These survey results must be scientifically investigated prior to a binding Threat Response Plan so that the potential positive effects of forestry are not inherently discarded. It should again be noted in the context of the above survey results that no afforestation was undertaken in any of the SPAs since 2013 and therefore an increase in forest area could not be attributed to the fall in Hen Harrier populations in any of the 5 SPAs in recent surveys.

Previous scientific papers have also highlighted the potential benefits of forestry. The Report "The importance of pre-thicket conifer plantations for nesting Hen Harriers (*Circus cyaneus*) in Ireland" (Wilson et al. 2009) states '*recent studies indicate that the use of forest habitats by breeding Hen Harriers may be much more extensive than previously thought*'.

The SHINE Hen Harrier Research Project Summary indicates that '*Hen Harriers in Ireland nest in young forest plantations with open canopies and strongly avoid grassland areas for nesting (Wilson et al. 2009). Young forests have been recorded as the most important nesting habitat in the most recent national hen harrier surveys (Ruddock et al., 2016).*

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<sup>1</sup> Wilson, M.W.; Irwin, S.; Norriss, D.W.; Newton, S.F.; Collins, K.; Kelly, T.C.; O'Halloran, J. (2009). "The importance of pre-thicket conifer plantations for nesting Hen Harriers (*Circus cyaneus*) in Ireland". *Ibis*. 151 (2): 332. doi:10.1111/j.1474-919X.2009.00918.x

<sup>2</sup> Haworth, P.F.; Fielding, A.H. (2009). An assessment of woodland habitat utilisation by breeding hen harriers. SNH Project No. 24069. Edinburgh: Scottish Natural Heritage.

The following study results must also be given appropriate prominence on reconsidering the role of forestry in Hen Harrier areas;

- Haworth and Fielding (2009) noted that forests supported a significant proportion of the Hen Harrier breeding population of western Scotland.
- Based on data derived from the 2000 and 2005 national surveys Wilson et al (2009) found no evidence that the area of post-closure plantations, within a 2km radius of the nest site, negatively affected Hen Harrier nest distribution. Also, it was noted that there was a positive correlation across study areas between changes in numbers of Hen Harrier nests between 2000 and 2005 and changes in the area of pre-thicket second rotation plantations over the same period.
- *'Pre-thicket forests were not observed to have an effect on breeding success by Caravaggi et al., (2019),...'* (Taken from Draft Hen Harrier Threat Response Plan 2024-28).
- It has been shown that *'Forests less than 15 years old constitute to varying degrees a potential foraging resource for Hen Harriers'* [Source: Hen Harrier Conservation and the Forestry Sector in Ireland 2015].
- Furthermore, the 'Ireland Hen Harrier Survey Report 2015,' on page 63 states, *'In all regional areas the results of this study do not allow conclusions to be drawn on the causative factors behind increases and/or decreases and there are complications when analysing results at five year intervals since other annual increases or decreases may be occurring (see also Ruddock et al., 2012; NPWS, 2015).'*

It should be recognised that while predation may be a potential significant issue, there is likely to be increasing numbers of potential predators in a range of ecosystems, not just in forests. The above mentioned caveat in the Hen Harrier Survey Report 2015 that **'the study does not allow conclusions to be drawn'** is a clear indication that more research is required to underpin the proposed limitations on forestry in the proposed **Hen Harrier Threat Response Plan Actions 2024 – 2028**.

A strategy should be developed only when there is statistically robust scientific data and research results to support the elements of a long-term forest management strategy proposed in the **Hen Harrier Threat Response Plan Actions 2024 – 2028**.

As is evident from various points outlined above, more research is required into the interaction of forestry and Hen Harrier populations before adding further constraints and restrictions on afforestation, forest areas and forest management.

There is a real risk in implementing long-term strategies before robust research-based evidence is available and this could negatively impact on Hen Harrier populations.

The fact that recent surveys show that the SPA with the largest forest cover, Slieve Blooms, is the best performing SPA in terms of Hen Harrier population increase for the period 2005-2020 is a case in point. According to the '2022 National Survey of breeding Hen Harrier in Ireland', this is the only SPA that *'has maintained a broadly stable breeding population of hen harrier since the 2005 survey, with fluctuations of no more than one pair across the subsequent national surveys.'*

### **Comments on Section 7.3 Forestry (pages 45 – 49) of the proposed Hen Harrier Threat Response Plan Actions 2024 - 2028**

ITGA would make the following comments and observations on this section which is critical to the forestry sector;

- A clear agreement and detailed guidance for forest owners must be put in place before any proposed measure(s), as listed in the Actions in Section 7.3 Forestry, are implemented and agreement must be reached with Forest Owners on comprehensive reimbursement for all costs and losses to forest owners of undertaking such measures, particularly with regards to, but not limited to, 'reducing the forest footprint and applying appropriate follow-up'.
- Any proposed measures should only be put in place when there is accurate and scientifically robust data and research results to support these proposed elements including a long-term forest management strategy.

- Costs and losses to forest owners, as a result of the proposed measures, should be analysed and quantified and appropriate compensation measures put in place prior to any implementation of these measures.

The forest sector is of the view that the current forestry-related protection measures being enforced within SPAs in Ireland, including the cessation of afforestation and restrictions on forest operations, need to be based on statistically robust scientific research results and are too restrictive and in fact disadvantage Hen Harrier populations in many areas, as demonstrated by recent survey results.

ITGA and the forestry sector is of the view that the current forestry-related protection measures may not be delivering Hen Harrier conservation solutions and alternative approaches must now be investigated. The sector notes that successful conservation of the Hen Harrier in Ireland requires robust scientifically based solutions and effective and meaningful consultation with all affected parties to ensure their buy-in to the process.

The following points\* should be fully acknowledged in any future Hen Harrier Threat Response Plan and were taken from the Hen Harrier Conservation and the Forestry Sector in Ireland (2015);

- *O'Flynn (1983) considered that the recovery of the Hen Harrier breeding population from the 1950s onwards appeared to have been due to an increased availability of secure nest sites and passerine prey species. O'Flynn (1983) cites the government's adoption of a long-term afforestation plan in 1947 of circa 400,000ha to be planted over 40 years as the likely driver of this change with Hen Harriers using the recently afforested (i.e. pre-thicket) areas to both nest in and forage over.*
- *Based on an analysis of foraging spatial data derived from the remote tracking of three individuals from one study site (The Ballyhouras) the following information is of relevance (from Irwin et al., 2012): 24 • The study birds made greater use of forest habitats than non-forest habitats for foraging. This may be explained by the greater availability of the former habitat in the area around nest sites. These were all located in second rotation pre-thicket forests and surrounded mainly by this and other forest habitats.*
- *Although forestry related activities may potentially cause disturbance events at a small number of known roosts, the main threats, and pressures on Hen Harriers at winter roost sites have been identified to be predominantly non-forest related. These include agricultural reclamation (roost and habitat loss); timing of cultivation practices such as ploughing and spraying (reduction in prey 26 availability); renewable wind energy development (displacement and disturbance); and human disturbance (NPWS, 2013a).*

[\* Above extracts from Hen Harrier Conservation and the Forestry Sector in Ireland (2015)]

It should also be noted that in 2005 almost one third of the Hen Harrier nest sites analysed were found in second rotation pre-thicket habitat. As this habitat only accounted for 5% of the total study area shows that this habitat was strongly selected by nesting Hen Harriers (Wilson et al 2009).

The Irish Timber Growers Association (ITGA) through its work and various information and representation initiatives is committed to supporting the forestry sector and a scientifically based and meaningful Hen Harrier Threat Response Plan.

ITGA is actively supporting and promoting forestry's contribution to many ecosystem services including working with the Hen Harrier Threat Response Plan Consultative Committee. The Association highlights the importance of developing and implementing a comprehensive and robust plan that achieves the stated aims and the approach outlined by NPWS to develop and implement the Threat Response Plan with both the Inter-Departmental Steering Group and Consultative Committee and particularly to 'understand the context of the activities that may impact hen harrier, and the concerns of stakeholders affected' and to 'develop a shared understanding of conflicts and the conservation requirements of hen harrier,' while building 'a consensus on how to reach those requirements, and set out and implement the necessary measures.' The Association believes that this is feasible only where stakeholders valid concerns as highlighted above are addressed in a meaningful way in any Threat Response Plan.