**Submission deadline:** 5pm February 20th 2024

**Email to:** henharrierconsultation@npws.gov.ie

**Post to:** Hen Harrier Threat Response Plan Consultation; Agri ecology Unit; National Park & Wildlife Service, 90 North King Street, Smithfield, Dublin, D07N7CB

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**Submission to the Public Consultation on Threat Response Plan for the Hen Harrier 2024-2028**

 X February 2024

Dear Sir / Madam,

Thank you for the opportunity to make this submission. There are a number of points I/we wish to raise.

Firstly, farmers / foresters cannot be less well off from their efforts to preserve the Hen Harrier and its habitat, whether for wintering or breeding.

The key role and preservation efforts that farmers in Hen Harriers areas are, and do play, in maintaining and enhancing the habitats for this species needs to be more fully recognised and better supported.

More targeted, results-based and tangible supports (advisory & financial) are needed to assist farmers in ensuring their habitats are protected, while not infringing on farming productivity.

Outside factors, such as predators and the risk of disturbance of recreational users in the outdoors, both of which has increased significantly in recent years, also needs further consideration. There is currently no defined actions in the plan to address either of these risks. At a minimum predation needs to be addressed. A recent study in Scotland found that all the hen harrier nest failures were due to natural factors or predation by foxes and other birds.

Initiatives must be given time to develop and yield tangible results. What is the point having a 5-year scheme and then pull the plug, or dilute its ambition by throwing it into a less targeted nationally run scheme, like ACRES. Future supports must be locally led and designed by farmers, for farmers.

In the past, the Hen Harrier Programme paid farmers on top of their GLAS payments. Now, it has been subsumed into ACRES, which has been a disaster this year, and whose measures are less targeted and more habitat based. Where is the financial incentive for farmers here – we are getting less money now than we got in the past, to protect a species under even more threat.

Under no heading can there be any further designation of lands either, or restrictions placed on SAC / non-SAC lands. Designation have been shown to slash land values and increase the management costs due to higher environmental standards, which decrease farmers’ flexibility with regards the management of the land. The existing supports are wholly inadequate and do not address the fundamental issue of loss of income and the devaluation of land values. Farmers need permanent payments for permanent designations and no additional lands should be designated until this is rectified.

Farmers must be fully consulted on the implementation of the Threat Response Plan. Successful conservation requires effective and meaningful engagement with all affected parties to ensure buy-in to the process. In addition, it requires practical and effective conservation solutions which are balanced, well informed and proportionate to the risks involved.

Speaking specifically to forestry, the aforementioned points are all relevant, but there needs to be substantive change in policy too including acceptance that forest management practices including afforestation are wholly compatible with hen harrier conservation when managed at a landscape level, (ii) the restrictions on planting and forest management activity within SPAs and non-designated important areas need to be reviewed, (iii) if a forest owner is financially impacted as a result of restrictions to protect the hen harrier they must be compensated for the conservation service they are providing and (iv) there needs to be greater stakeholder engagement and communication with forest owners that are within SPAs to rebuild trust.

I trust the above will be considered and farmers will not be disadvantaged from their efforts in preserving the Hen Harrier.

Yours sincerely,

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