

Department of Agriculture, Food and the Marine
Agriculture House, Kildare Street, D02 WK12

Dear Minister McConalogue,

I am writing to you on behalf of Hedgerows Ireland on the issue of importing Whitethorn (*Crataegus monogyna*) as part of ACRES actions.

Firstly, we regret that the Trader Notice (No. 12 of 2021) was only issued to nurseries in December 2021, leaving insufficient time for suppliers to collect seed and produce whips of the required size, which takes 3-4 years and has resulted in the current shortfall in 2023/2024. Supply of Irish Provenance trees is already at capacity with huge interest in the establishment of native hedgerows by local councils, charities and the private sector. It is unreasonable to expect nurseries to meet the demand for ACRES without additional supports. Particularly in light of the Department's past experience and knowledge of this demand-supply gap from previous agri-environmental schemes.

Secondly, we do not support the amendment in ACRES Circular 27 which removes the Irish Provenance/Irish Origin requirement for Whitethorn trees. Under ACRES, a maximum of 85% single species composition is allowed and usually, this means Whitethorn. Therefore, the majority of a planted hedgerow may now not be of Irish Provenance. Hedgerows should encompass the three fundamental biodiversity levels of a) genetic, b) species, and c) habitat diversity. Importing Whitethorn trees does not conserve the genetic integrity of Ireland's own populations and the potential phenology differences create a risk of mismatches between lifecycles of Whitethorn and Ireland's pollinator populations. Imports could also expose our existing Whitethorn to diseases such as Fireblight (*Erwinia amylovora*), of which Whitethorn is a common host. Fireblight is listed as a Protected Zone plant pest to ensure "Irish biosecurity and preserve our favourable plant health status"¹. A strict eradication and prevention programme was implemented in the 1980s, although efforts in Galway city remain unsuccessful². An outbreak in Co. Dublin in 2022 also resulted in the removal of street trees³. Factors such as latent infections, symptoms not being expressed until the plant is under stress, and the pest's suitability to Ireland's mild climate make the import of vast quantities of Whitethorn a perfect storm⁴.

Thirdly, we would like to alert the Department of other biosecurity risks from importing such a high volume of trees. Ireland is sensitive to new introduced plant diseases being a maritime island on the westerly fringes of Europe and due to the prevailing westerly winds carrying most potential pathogens and diseases away from its terrain. We already have 396 records of pests of trees on the island of Ireland (the majority being arthropods and fungi), with possibly more than 44 non-native pest introductions². The Phytophthora genus is a particularly serious risk globally and although Whitethorn is not a frequent host, it is sometimes affected by this pathogen⁵. Since geographical isolation and climatic conditioning make Ireland phytophthora-sensitive and a number of Phytophthora species have been detected here in the past, we must take every precaution to mitigate additional risks².

¹ Department of Agriculture, Food and the Marine. "Pest Risk Analysis Unit – Plant Pest Factsheets", 2023. <https://www.gov.ie/en/publication/7b101-pest-risk-analysis-unit-plant-pest-risk-register-factsheets/>

² O'Hanlon, Richard, et al. "Catalogue of pests and pathogens of trees on the island of Ireland." *Biology and Environment: Proceedings of the Royal Irish Academy*, Vol. 121B, No. 1, 2021, p. 21-45. Project MUSE, <https://doi.org/10.1353/bae.2021.0005>.

³ Dublin City Council. "Fireblight Outbreak: Riverston Abbey, Ashtown, Dublin 7", 2022. <https://www.dublincity.ie/residential/parks/news-and-events/fireblight-outbreak-riverston-abbey-ashtown-dublin-7>

⁴ Department of Agriculture, Food and the Marine. "DAFM Plant Pest Factsheet: *Erwinia amylovora* Fireblight", 2023. <https://www.gov.ie/pdf/?file=https://assets.gov.ie/267419/5ddd15ae-9de7-42cd-82c3-9e3c7820ba48.pdf>

⁵ RHS. "RHS Gardening Advice: Phytophthora root rot plant list", 2020.

To resolve these issues, we reiterate calls by Dr. Alan Moore (Hedgerows Ireland, Tipperary) and Joe Gowran (Woodlands of Ireland) to extend the deadline for ACRES hedgerow planting actions. By extending the deadline beyond March 2024, nurseries will have more time to reallocate stock to ACRES. Hedgerows Ireland also welcomes the reinstatement of the Irish Provenance/Irish Origin requirement. If there is insufficient stock of Irish Provenance hedgerow species, we feel it is preferable that ACRES limits the volume of planting. Although the best time to plant a tree is now, it must be the right tree. Under the precautionary principle, it is better to wait for 3-4 years until the demand-supply gap can be rectified than plant vast quantities of imported trees now and face the consequences later. We request that in 2024, the Department initiate a programme to set up and support local nurseries around Ireland to help to meet the demand for Irish Provenance plants in future years. Besides the loss of genetic diversity, most of Ireland's existing hedgerows are composed of Whitethorn and therefore vulnerable to Fireblight, and potentially Phytophthora and other pests. The Department has a responsibility to avoid consequences similar to the devastation caused by Ash Dieback disease. We urge you, Minister McConalogue, to take quick and effective action on this matter.

Kind regards,

Katie Smirnova
Campaigns Officer
Hedgerows Ireland

Supported by:

Shane Downer, Executive Officer
Mark McDowell, Hedgerow Expert & PRO
Adrian Fitzpatrick, Director
Chris McCarney, Director
Clive Lyttle, Director
Eamonn McLoughlin, Director
Eoin Donnelly, Director
Sonja Moore, Director

Hedgerows Ireland CLG is funded by the Irish Environmental Network and the Heritage Council. Our website is www.hedgerows.ie and we may be contacted on info@hedgerows.ie or + 353 86 302 8790.