



**Environmental
Pillar**

Working for a sustainable future

01/03/2024

Open Letter to the Department of Agriculture, Food and the Marine on the Risk of *Erwinia amylovora* (Fireblight) from Hawthorn Imports for ACRES.

Dear Minister McConalogue,

We are writing to you regarding the risk of *Erwinia amylovora* (Fireblight) from *Crataegus monogyna* (Hawthorn) imports for ACRES. Ireland is still managing the fallout from Ash Dieback, which was most likely introduced through imports from EU Member States. We must not make the same mistake with the present danger posed by Fireblight. This is categorised as a Protected Zone quarantine plant pest to ensure “Irish biosecurity and preserve our favourable plant health status”¹. Its threat is assessed under Ireland’s Plant Health Generic Contingency Plan, which states that “at any stage during the management of a finding or outbreak, the degree of risk can be re-classified in the light of new information, sample results, technical advice or developments”². We are concerned that the threat to Ireland’s hedgerow heritage has not been adequately considered in assigning Fireblight’s alert status.

Fireblight is known to enter through latent infections on imported plants and is suited to our temperate climate, being widespread in Northern Ireland and confirmed by DAFM in 17 outbreaks across 11 counties in 2023^{3,4}. Nevertheless, ACRES Circular 27 removed the Irish Provenance/Irish Origin requirement for Hawthorn (which may compose up to 85% of ACRES hedgerow planting)^{5,6}. The high demand for imports therefore increases the disease risk for Fireblight’s common hosts—*Cotoneaster*, Hawthorn, apple, pear, and rowan—spread through multiple pathways such as pollination, wind, rain, and mechanical equipment³. Importing trees also reduces Ireland’s ability to safeguard the genetic diversity of native tree species, which it committed to under the Convention on Biological Diversity.

Any failure to arrest the spread will result in significant impacts on Ireland’s natural and cultural heritage due to the loss of Hawthorn hedgerows—a refuge for wildlife and a distinctive feature of our landscape. For example, this species composed 88% of hedgerows in the County Kildare Hedgerow Survey 2022⁷. The rapid spread of Fireblight will be devastating to our hedgerow network, as both the infected plant and all nearby host plants must be burnt or buried^{2,4}. Evidence can be seen in Germany, where outbreaks between 1972 to 2000 resulted in the removal of 812km of Hawthorn hedgerows⁸. In

¹ DAFM (2023) Pest Risk Analysis Unit – Plant Pest Factsheets
www.gov.ie/en/publication/7b101-pest-risk-analysis-unit-plant-pest-risk-register-factsheets/

² DAFM (2023) Ireland’s Plant Health Generic Contingency Plan, Ver. 1, Dec. 2023

³ DAFM (2023) DAFM Plant Pest Factsheet: *Erwinia amylovora* Fireblight

⁴ McConalogue, C. (2024) Dáil Éireann Debate. Question 396, Wednesday 7th February 2024.

⁵ DAFM (2022) Agri-Climate Rural Environment Scheme (ACRES) Specification for Tranche 1

⁶ DAFM (2023) ACRES Circular No. 27, Amendment to Planting a New Hedgerow specification for Tranche 1 & 2, and NPIs

⁷ Flynn Furney Environmental Consultants (2022). County Kildare Hedgerow Survey 2022, Kildare County Council.

⁸ Peil, A. et al. (2009) Improvement of Fire Blight Resistance in Apple and Pear. International J. of Plant Breeding.

recent decades, Irish farmers have planted approximately 1400km, 600km, and 1300km in REPS, AEOS, and GLAS, respectively^{9,10}. An additional 2000km are estimated to be planted in ACRES¹¹. With a payment of €5/metre/year (5 year schemes), this would equal roughly €132.5m paid to plant farm hedgerows—mostly Hawthorn—which may be wasted if these are lost to Fireblight.

Similar to roadside trees with Ash Dieback, there will be costs associated with the removal and disposal of affected Hawthorn hedgerows, plus their replacement with new trees and fences to maintain a stock-proof barrier on farms. The Fireblight Disease Order 1964 obligates landowners to notify DAFM of suspected infections and destroy specified trees¹². However, they may not volunteer information without accompanying government funding to cover costs. If Fireblight spreads, the need for more DAFM inspections will also increase staffing costs. In addition to hedgerow impacts, Ireland's €131m apple industry would suffer long-term financial losses, as Fireblight is “not only destructive to the current year's crop but also extremely dangerous to the plants themselves”^{13,14}.

The European and Mediterranean Plant Protection Organization (EPPO) states that the most effective mitigation strategy is to impose “strict phytosanitary measures on imported host plant material and to maintain vigilance in orchards and nurseries”, as well as place plant import bans in high-risk countries¹³. In light of this guidance and the Precautionary Principle of Sustainable Development, we ask DAFM, as the Competent Authority for plant health in Ireland, to:

1. Reinstate the Irish Provenance/Irish Origin requirements for Hawthorn in ACRES hedgerow planting and delay planting actions until the demand-supply gap is filled.
2. Suspend imports of Hawthorn plants due to the potential risk of importing disease.
3. Clarify how natural and cultural hedgerow heritage was assessed when deciding the Generic Contingency Plan's alert status for Fireblight. If this was not assessed, raise the alert status and establish a Co-Ordination Group including ecologists to address all risks to Ireland's hedgerows.
4. Continue to promote funding for native tree nurseries under the Seed Stand & Seed Orchard Schemes plus the Investment Aid for the Development of the Forest Tree Nursery Sector Scheme.

Hedgerows Ireland CLG promotes the conservation and nature-friendly management of hedgerows. It is funded by the Irish Environmental Network and the Heritage Council.

An Taisce, as Ireland's National Trust, advocates for sustainable planning and policy, delivers educational programmes, and preserves heritage properties and nature reserves for the Irish public.

The Environmental Pillar works to represent the views of 32 of Ireland's leading environmental NGOs and is supported by the Department of Environment, Climate & Communications.

Endorsed by: sign this open letter and see the full list of signatures on www.hedgerows.ie/fireblight.

⁹ Hedgerows Ireland (2016) Minutes from Meeting with DAFM over Hedgerow Measures in GLAS.

www.hedgerows.ie/wp-content/uploads/2019/11/2016-Meeting-with-DAFM-over-Hedgerow-Measures-in-GLAS.pdf

¹⁰ Donnelly, M. (2015) GLAS in numbers: 90,000 bird boxes and 1,300km of hedgerows, Agriland.

www.agriland.ie/farming-news/glas-in-numbers-90000-bird-boxes-and-1300km-of-hedgerows/

¹¹ Roache, M. (2023) Hedgerows and ACRES requirements, Teagasc.

www.teagasc.ie/publications/2023/hedgerows-and-acres-requirements.php

¹² Irish Statute Book (1964) S.I. No. 19/1964 - Fire Blight Disease Order, 1964.

¹³ EPPO (2024) EPPO Datasheet: Erwinia amylovora. www.gd.eppo.int (accessed 2024-02-12).

¹⁴ Teagasc (2020) Commercial Apple Production, Fact Sheet, Horticulture 03, V1.