



Irish Wildlife Trust
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Department of Agriculture, Food and the Marine
Kildare Street,
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August 28th 2020

Re: Draft Agriculture Appeals (Amendment) Bill 2020

The Irish Wildlife Trust (IWT) would like to make a submission to the Draft Agriculture Appeals (Amendment) Bill 2020. The IWT is a national conservation charity which has been working since 1979 to protect and restore Ireland's natural heritage.

We would like to express our strong opposition to this Bill and, in particular, the aspects therein which are designed to stymie and inhibit public participation in the forestry sector. The forestry industry in Ireland has been in difficulty for some time and the currently acute crisis it faces is a manifestation of serious, underlying and chronic failures. However, instead of addressing these failures, this proposed Bill seeks to paper over them by limiting who can object and raising barriers even to those who the Government may decide can object. While this approach is likely to be favoured by the state-subsidised forestry industry it is ultimately counter-productive as it will increase opposition and suspicion of a sector that is not in compliance with environmental law or the basics of social justice.

It must be noted that faced with the might of the state-supported forestry industry, lubricated with overly-generous injections of public money, the only brake on the advancement of harmful forestry has been the diligence and determination of community-groups, individuals and environmental NGOs. This Bill is clearly designed to remove this brake. In doing so it grants a gift to industrial/commercial interests in a particularly anti-democratic manner.

The IWT urges the government to address the underlying failures in the forestry sector as a matter of priority. We need a new forestry plan that is nature-based in all its aspects. Forestry must be compliant with all relevant EU and national environmental law. In addressing the biodiversity and climate crises, forestry must come within the boundaries set by nature – this is doubly so where public money is being spent.

The manner of this consultation, published on a bank holiday weekend during a month when people are generally on holiday, adds further to suspicion and undermines public confidence. It is imperative, therefore, that this consultation exercise is seen to be meaningful and we will closely watch how the submissions influence any further decisions in this matter.