



Pádraic Fogarty  
Campaign Officer  
Irish Wildlife Trust  
8 Cabra Road,  
Dublin 7,  
D07T1W2

Department of Agriculture, Food and the Marine

November 29<sup>th</sup> 2022

### **Irish Wildlife Trust submission to the Forest Strategy Implementation Plan**

To whom it may concern,

The Irish Wildlife Trust (IWT) is a national, charitable, membership-based organisation which was established in 1979. Our goal has been to raise awareness of our natural heritage and its benefits to people and for over 40 years we have sought to do this through a combination of education and active campaigning for policies that recognise the inherent value of nature and biodiversity.

The IWT has been a member of, and active participant in, 'Project Woodland' and Working Group 2 'Shared National Approach'. This was a collegial and constructive process and we used our voice to the best of our ability to highlight two things:

1. the **restoration of native forest ecosystems** is vitally important if we are to meet climate, water and biodiversity objectives; and that
2. the commercial timber industry must transition to a **climate and biodiversity-friendly model** if it is to not only help meet these goals but also to regain public support.

As part of 'Project Woodland' an extensive, and intensive, public consultation was carried out which included:

- A public attitudes survey where 1,000 people were interviewed;
- 6,000 questionnaires sent to members of Irish Rural Link including seven focus group sessions;
- A Youth Forum;
- An online survey which received 3,148 responses;
- A 'deliberative dialogue', held over two days with 100 randomly selected citizens and which was addressed by an Taoiseach Micheál Martin;

- 28 bilateral meetings between officials of the Department of Agriculture, Food and the Marine and ‘key stakeholders’ (including industry and environmental NGOs).

We were very happy to find that the outcomes of these consultations tallied with our own objectives.

There was an overwhelming desire to see **more forests**, indeed the deliberative dialogue found that a clear majority (56%) agreed that the level of ambition should be even greater than 17,000 hectares of forest creation per annum (i.e. meeting 18% of land cover sooner than 2050).

The Irish Rural Link work asked that **alternatives to clear-felling** be investigated, highlighting the negative impacts this practice has on rural communities.

Analysis of the online responses found that 98.2% of respondents thought ‘**forests for nature**’ were ‘important or ‘very important’ with ‘**forests for climate**’ close behind, at 97.9%. The figure for ‘forests for wood’ was behind these, at 81.4%.

The public attitudes survey found that 74%, the highest proportion of respondents, found that people wanted more forests in their area “to provide **places for wildlife to live**”, 62% wanted forests “to **combat climate change**” while a mere 22%, the lowest proportion, wanted forests “to make us self-sufficient in timber and wood products”.

This is not to say that we should abandon production forests, the IWT believes that timber can and should play an important role in a low carbon economy. It is a sector that can provide important local employment and income. However our view is that this should not be the priority of Ireland’s Forest Strategy. **The biodiversity and climate emergency must be the priority** as this will then be the basis for a timber sector that is climate resilient, nature-friendly, and economically sustainable.

We also refer to the **Joint Committee on Environment and Climate Action** Report on Biodiversity (November 2022) which made a number of recommendations in relation to forests including:

*29. The Committee recommends that remaining old oak forests in the State should be designated as special areas of conservation.*

*47. The Committee notes that the many benefits of forestry which include biodiversity, carbon sequestration, water quality and recreation, and notes that these benefits are often not incorporated into the mainstream forestry model in Ireland. The Committee recommends that priority be given to implementing the Continuous Cover Forestry, CCF system on a broader basis for greater sustainable forest management, with the development of a best practice guide for CCF and specific targets for CCF. It is also important that appropriate environmental assessment of afforestation locations takes place to ensure new forestry is not planted on high nature value lands such as wetlands and peatlands that was a practice in the past. The Committee is also of the view that greater public awareness of CCF is needed to encourage private landowners to deliver and prioritise this system.*

48. *The Committee recommends transitioning away from the practice of monocultural forestry and pursuing a policy of forestry diversification instead to increase the resilience of our forests and improve biodiversity.*

50. *The Committee recommends Ireland's next Forestry Programme puts wild bird, pollinator and habitat conservation at its core by identifying and protecting their habitats and avoiding all afforestation on high nature value grasslands and peat habitats and ensuring that forestry activities are wholly in line with EU environmental law.*

The **EU Forest Strategy**, published in 2021, seeks to put forest management across Europe on path to climate and biodiversity resilience. It highlights how climate change and biodiversity loss are *the* significant threats to timber production. This includes the threats from droughts, fires and pests and emphasises how these threats are particularly pronounced in “mono-specific and even-aged forest stands”, i.e. the types of forests upon which the Irish timber industry has been designed.

To transition to a healthy, multi-functional forestry model it states that:

*we will need larger, healthier and more diverse forests than we have today, notably for carbon storage and sequestration, reduction of the effects of air pollution on human health and halting loss of habitats and species.*

It says that:

*In light of climate change and biodiversity loss there is an urgent need for adaptive forest restoration and ecosystem-based management approaches that strengthen the resilience of EU forests.*

Particularly relevant for Ireland is the requirement that:

*silvicultural practices include clear-cutting, for which environmental and ecosystem concerns,, including the needs of certain species, should be increasingly taken into account. These practices should be used only in duly justified cases.*

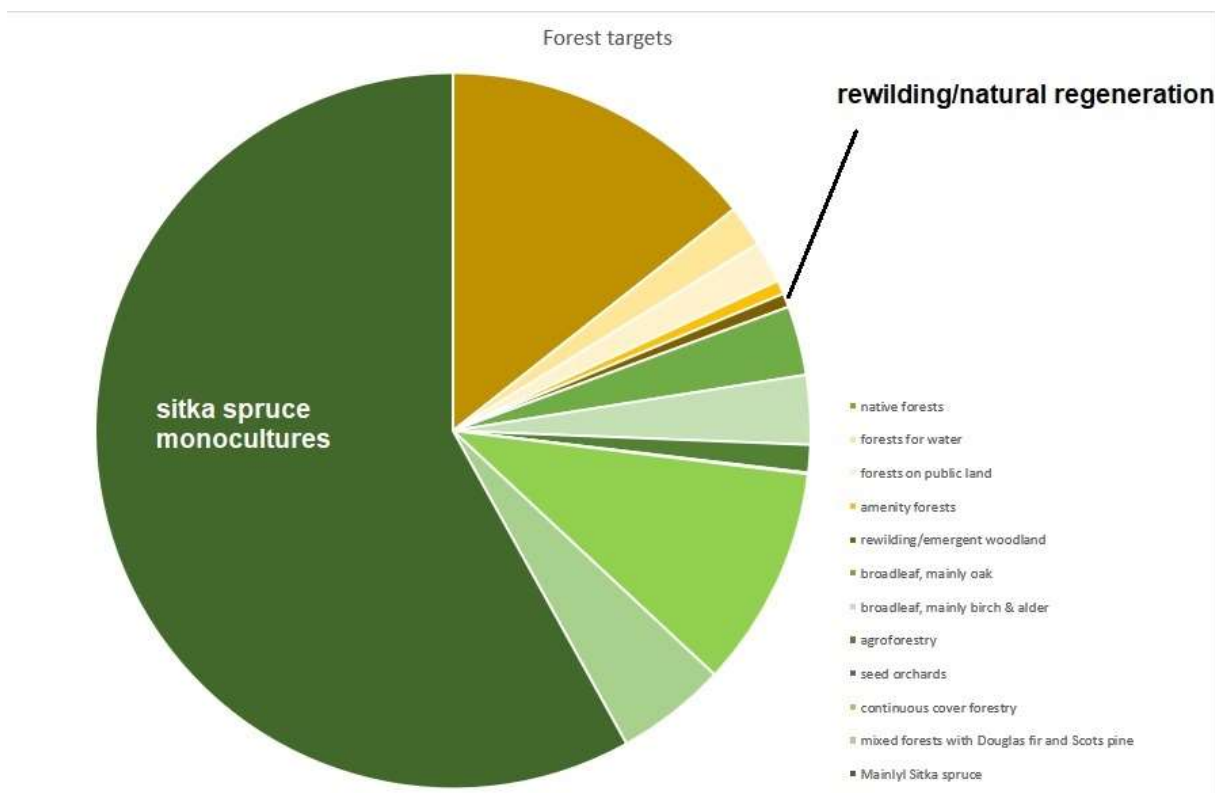
The Minister for Transport, Climate, Environment & Communications, Eamon Ryan, is on the public record saying that **Ireland supports the EU Forest Strategy**.

The draft Forest Strategy says that “Ireland's Forest Strategy is in alignment with these principles” however this statement must be challenged, as will be discussed further.

In short, despite the EU Forest Strategy, the report from the Joint Oireachtas Committee, and the outcomes of the public consultation, the draft Forest Strategy gives **no indication** that the ecological restoration of native woodland will be prioritised or that commercial timber production will transition away from the model of **monocultures and clear-felling**.

This system has **lost its social licence**. The Minister for Land Use and Biodiversity recently announced that the next Forestry Programme will be **100% funded from public money** to the tune of €1.3 billion. The department has **no mandate** to spend this money on a forestry model that no longer has a social licence to operate.

There are many noble aims in the draft Forest Strategy however the true intentions are revealed on pg65 in a table titled “8,000ha annual afforestation target broken down by Forest Type”. We note that this is the **lower end of ambition** as voted upon during the ‘deliberative dialogue’. Nevertheless, the department envisages that roughly **70% of this target is to be met with monoculture plantations**, principally of the coniferous variety that have lost all public support.



**Pie chart based upon targets in the draft Forest Strategy**

It needs to be further noted that this table was never discussed at our Project Woodland meetings. Despite the persistent reference to three ‘Rs’, (the right tree in the right place for the right reasons) there was very little discussion as to what this means. We therefore have serious concerns that a **Business As Usual approach** is being pursued.

This approach can be further seen on the measure for forest promotion which is focussed on improving the image of the forestry industry and timber production. This is not a balanced approach.

The IWT would like to emphasise that we are **broadly supportive** of the planned Native Tree Area Scheme to allow landowners to plant 1 hectare of native trees without seeking a licence. However, we see no safeguards in place that will ensure that this scheme will not result in negative effects to biodiversity, e.g. on peatlands, ground-nesting birds or species-rich grasslands. A measure that will use sensitivity mapping, as promoted by our colleagues in BirdWatch Ireland, should be urgently deployed. Indeed, despite European Commission rulings in relation to forestry in Ireland, **the Department still has not working definition of High Nature Value farmland**, which would help to ensure that sensitive features were protected.

Furthermore, it would appear that this scheme may support monoculture crops which are poor for biodiversity, even if they are native species. We also have no reassurance that ‘native trees’ means native genetic stock. Imported specimens from nurseries outside Ireland can undermine native biodiversity even if the species is the same (the disaster of Ash dieback further emphasises this point).

For maximum benefit, the Native Tree Area Scheme needs to be focused on **native forest establishment** and to target areas where it is most beneficial – e.g. expanding existing native woodlands, protecting riparian corridors and preventing pollution run-off (i.e. availing of the EPA’s ‘Pollution Impact Potential’ maps).

## What we would like to see

- **Forestry premia should not be paid for monoculture plantations.** There is no justification for promoting this model of forestry, even if the proposed premia are substantially less than those for native woodlands.
- The restoration of native forest ecosystems should be an **explicit aim of the Forest Strategy**. This should be reflected in targets for new native woodland which are at least equal to those of commercial timber production – i.e. a 50/50 split.
- We would like to **greater ambition** as reflected in the outcomes of the public consultation.
- There should be no promotion of biomass as a fossil fuel subsidy. Burning wood is not carbon neutral and per unit energy may emit more greenhouse gases than coal. While it may have small-scale applications, or be a useful use of the lowest quality offcuts, there is too great a risk of perverse incentives if it were to receive public support. From a carbon perspective, the over-riding imperative is to reduce emissions from all sources as quickly as possible and to the greatest extent possible.
- There must be incentives for farmers to protect, enhance and expand existing native woodland. The current Native Woodland Conservation scheme does not sufficiently provide this incentive. Premiums are low (even at an increased rate of €500 p.a.) and only last for 7 years (as opposed to 20 years for new forests). This perversely devalues the most valuable stands of old or native forests. We support the recommendation put forward by the Joint Oireachtas Committee that all Ancient and Long-established

Woodland be designated within the Natura 2000 network (or a similar designation, e.g. Natural Heritage Area) however this needs a specific scheme that will incentivise its management as discussed.

- The proposed Payment for Ecosystem Services 'premium pilot' is welcome but, as noted above, must provide a longer-term incentive than the 7 years provided for. Nevertheless, we are supportive of the principle.
- It is welcome that a new category of rewilding/emergent woodland is proposed for inclusion. The natural regeneration of native forests is the quickest, easiest and cheapest way to substantially increase forest cover, and could meet the levels of ambition called for by the 'deliberate dialogue'. If we are serious about substantially increasing our tree cover in an ecologically coherent manner then this option must be central to the strategy. However, the table on pg65 suggests it will play a very marginal, even tokenistic role. This must change.
- The premia for rewilding/emergent woodland is too low, at €2,500. In fact, this could create a perverse incentive since a landowner with scrub/emergent woodland would be better off clearing it in order to avail of the €5,620 rate for planting native trees. Acknowledging that from 2023 farmers will be allowed to claim CAP payments on up to half their land for 'unproductive features' (e.g. scrub or more mature woodland), we would urge that payments be combined to maximise payments to farmers.
- Rewilding/native regeneration does not require a licence. It is therefore the least bureaucratic of all the ways to establish forest cover. This is another reason why it needs to be vigorously promoted.
- The EU's Nature Restoration Law was published in draft in June 2022. If passed, it will set clear and measurable targets for ecological restoration, including forests, which must be included in national Restoration Plans. The Forest Strategy should plan for this accordingly.
- The Forest Strategy does not adequately address the 'legacy' issue of forests planted in the wrong places, particularly on peatlands. Coillte's target of 30,000 hectares of rewilding/restoration is far too low to address the problem, representing perhaps only 13% of their estate on peat. While we acknowledge the scale of the challenge we are also of the view that this issue cannot be once again kicked down the road. Restoration of these sites is possible and will require a dedicated funding stream.
- The stipulation that forest schemes will not be eligible for payments on elevations above 300 metres should be removed. There is also a need to remove productivity criteria from schemes which are primarily for biodiversity or water protection. Native forests can grow at most elevations (the treeline is not known in Ireland due to the extent of deforestation and some ecologists believe there is no treeline at all). Again, a rewilding approach would allow for natural treelines to develop based upon local conditions.

## Conclusion and Summary

A lot of work has gone into 'Project Woodland' by many individual players and the public over the past 18 months. We know the issues that need to be tackled. The public, who will be paying for this plan, have made it very clear what they want. It is therefore very disappointing that the draft Forest Strategy does not intend to deliver.

Small improvements are no longer sufficient. Systemic, transformation change is needed. We know that biodiversity collapse and climate chaos are already upon us and yet we are not seeing the urgency or decisiveness needed to prevent the worst consequences. We know that nature is our greatest ally in this task and that mostly it just needs time and space. We need forests that are allowed to develop naturally, with all their component species, and not be cut down. We need to see nature-rich landscape as the basis for economic gain – nature is not a sideshow. Yet, the draft Forest Strategy still centres the interests of the timber industry and promotes material production over public good. This is not a sustainable approach. We hope that this submission will help to hasten the radical transformation that is needed in this sector.