

Comments on Draft Forestry Programme 2014 – 2020: Ireland

These comments are from Woodland Managers Limited, Merchants Dock, Galway.

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Comments here are personal views of John Phelan and /or foresters of Woodland Managers Limited.

1: Executive summary

It is stated that the (proposed) measures are consistent with the recently published “Forests, products and people – Ireland’s forest policy – a renewed vision” (this being the recommendations and report of the Forest Policy Review Group – referred to hereafter as FPP).

In respect of the most significant measure – afforestation – we respectfully suggest that is not so. Page ix of the FPP states:

“The main focus is to increase the annual level of afforestation to 15,000ha.”

Strategic action 1.1 states:

“The afforestation target will be 10,000ha per annum up to 2015 and 15,000 ha per annum for the period 2016 to 2046.”

That gives an FPP target of 90,000ha for the six year period to 2020. The objectives of the Draft Forestry Programme state 46,045ha for the same period (42,550ha of that is afforestation as intended in the FPP). Therefore the Draft Forestry Programme has effectively halved the target published in July and so could not be described as being consistent with....

If the opening statement is intended to refer to the detail of the measures rather than the objectives then we would also raise a question. Strategic Action 1.2 of the FPP states: *“Within the context of this policy and Food Harvest 2020, DAFM to develop an integrated approach to the achievement of these targets (i.e. the targets in Strategic Action 1.1) across land uses and schemes.”* There is no evidence in the proposed measures that this has been adopted.

Overall it would be more transparent to state the FPP targets, give reasons for the significant change and leave open the possibility for this or the next Government to revisit the Programme with a view to striving towards FPP targets.

Four needs are identified as drivers of the Draft Programme. We suggest that the need to mobilise all wood, not just forest based biomass to meet renewable energy targets i.e it should additionally as a fifth point also refer wood supply for the wood processing sector (or incorporate such a reference in the second point).

Objectives:

Afforestation – objectives should be consistent with the FPP.

Roads – is presumably based on a needs analysis although the figures seem low relative to approvals in 2012 and 2013. The objectives should align with knowledge of unthinned, but thinnable and unroaded, properties.

Page 8 – there is a reference to land remaining in forestry being a condition of the felling licence.

This is factually correct but merits the comment that it is based on legislation and that DAFM intend to continue that position under the new Forestry Act (if enacted).

The relevant paragraph does not refer to the effect of agricultural subsidies and t/or other land based schemes in retaining land from forestry. As pointed out in the FPP incentivisation of forestry presents *“a very significant challenge and cannot be done in isolation from overall agricultural policy and other land-use support measures.”* (page 2 – FPP). There is no evidence that this has been considered to any extent in formulating the Programme proposals. Arguably other measures e.g. Social Protection measures also act as inhibitors for land availability and again there is no evidence of a unified approach to increasing land availability.

2: Strategic Context

2.1.2 As commented already the failure to acknowledge the scale of the targets in the FPP is a significant omission and the proposed Afforestation Scheme could hardly be described as a serious response. (Incidentally the word “principal” is wrongly spelled as “principle” in this section).

The support for Knowledge Transfer is welcomed but appears to confine itself to “forest holders” whereas the FPP envisaged suitable programmes across the sector.

Page 22 – The last point under Threats is an Opportunity rather than a Threat? (e.g. co-operative forest roads).

3.1.2 Priority 2 SWOT We have reservations about the proposed agro-forestry scheme from a number of aspects including the implications for land use (e.g. does the land become subject to the Forest Act requirements re remaining in forestry, the likely distraction from core afforestation, the minimal contribution to wood supply). The lack of knowledge in this area suggests that a small number of pilot projects, perhaps ten or so (rather than the envisaged 195) to achieve a range of soils and farm types, and perhaps managed by Teagasc, would be far more beneficial than a measure at this stage. Mistakes have been made in the past by driving silvicultural practice by the content of measures rather than first doing serious trial work.

3.1.4 SWOT – Weaknesses (Page 26). It is stated that that there is a limit to the amount of land available for forestry. That should be contextualised – what limit is being referred to?

The last point on page 26 refers to little or no planting occurring without financial support – this is almost certainly correct but the scale of that support is also a factor of other land based supports.

Second point page 27 – Some broadleaves sites planted post 1980 require fertilising etc. That need is also there for – indeed we would be far more aware of it in relation to – coniferous sites.

The last point in that section (Most native woodlands etc.) is a repeat of the third point, same section.

Opportunities (Page 27) – there is a reference in fourth point to “relatively risk free” – that would make more sense as “relatively low risk”.

Opportunities also include employment opportunities in beleaguered rural Ireland, export opportunities and productive use of marginal agricultural land.

Threats – second point – while correct to state that fires destroyed 1,500ha in 2011 (and also something similar in 2010 as we recall) – the point might be better stated as:

Abiotic threats (primarily fire, wind and frost) – e.g. fire destroyed over 3,000ha of forests in 2010 and 2011 and wind destroyed over 7,000ha in 2014.

3.1.5 SWOT Page 29 – while not having any detailed knowledge we question whether SRF/Energy crops further foster carbon sequestration to any significant extent given short rotation.

The market for firewood is stated as an opportunity – but that raises questions re management practices – as to whether broadleaf management of existing crops should be responding to an increasing firewood market or whether future crops should be grown as a firewood supply source.

The management objectives (arguably both State (FS) and private) are crucial in determining the management practices and indeed the establishment costs.

Threats – Fires – expand to main abiotic threats.

3.1.6 Priority six SWOT Strengths – we could not agree that (public) road infrastructures are generally of good quality – it is almost the opposite especially in Western and North-western counties with which we are most familiar. Likewise communication infrastructure remains poor in some rural areas such as access to good broadband (as indeed is stated later on) – which would greatly aid efficient forest management and logistics.

Opportunities – the major opportunity is the creation of a productive resource on otherwise marginalised land; both the establishment of the resource and its utilisation will job create and foster sustainable local development.

Threats – the last three points relate to amenity aspects – it is difficult to see their relevance to the Priority six.

4 Programme Approach

Principal constraints (page 33):

The second part of the first constraint (“Failure of the marketplace to properly incentivise farmers and other land holders..... to manage their forest properly for maximum benefit”) is questionable if not entirely wrong. Well managed coniferous forests, and better broadleaf forests are economically rewarding (when receiving road / broadleaf improvement grants) as demonstrated by the reasonable return on such forests. The limitation in that area includes: a combination of policy led, premium driven forest “design” leading to higher premium incomes but less economic units; ignorance of the benefits of good management and some social factors such as aging.

There is a third significant constraint – the interaction of agricultural and social subsidies and eligibility regulations which create economic barriers, some real, some perceived or feared, between land owners and afforestation.

Also availability of land is constrained by environmental requirements, where the current rigid precautionary principle could almost certainly be adjusted by results of research and adaptive forestry practice.

The first two described measures a) and b) could be regarded as addressing to some extent land availability although some may regard the increase in premium being more than offset by reduction in duration as a negative.

The third point c) is unclear to us in how it addresses the stated constraints although it is agreed that the continuation of the roads scheme (albeit with defects), the broadleaf improvement programme and the KTG measure will help.

4.1.1 Market failure – there is a reference to first thinning revenues and road costs – these are probably average figures – the problem is that anything above average is not then adequately grant aided (we will return to that when commenting on the Roads measure).

4.2 Needs – 4.2.1 again we emphasise that the objectives of this draft Programme fall well short of what is needed to achieve forest cover of 18% by mid-century (page 35) and steady state sustainable supply 7 – 8 million m³ p.a. (page 35). It would be better if the Draft was clear and open on that point.

4.2.3 - in looking at figures care needs to be taken in interpretation – many owners of mid rotation plantations are old, incapacitated or ownership has passed to family members who live elsewhere and so on. The existing skills and knowledge base is focussed on a narrow group of younger, active owners and it does not necessarily follow that building on that will achieve close to full achievement of the desired culture of forest management.

Result Indicators should have specific targets rather than generalised statements – almost by definition Need No. 1 will be met as stated (Increase Ireland’s Forest Resource) but the difference between achieving 30,000ha, 50,000 or indeed the FPP requirement of 90,000ha over the period to 2020 is significant. The same applies to other Indicators.

Need number 2 should not just be confined to biomass; wood production increase is essential to survival / expansion of wood processing sector.

Page 39 - Second paragraph (*The forest road scheme will also give preference to group applications where funding is limited.*). This would be very unfair; if implemented, an owner’s application may be moved down the list because of having a stand alone property. It could also be wrongly interpreted as FS policy with inspectors deciding that if a number of properties are adjoining and each property has its own access to the public road that they should still submit a joint roading application with only one entrance, to be more cost effective etc. This could pose major difficulties. The focus should be on enabling roading of properties and encouraging owners.

Page 40 – reference to CPD for professional foresters – should not be confined to events (or indeed to forestry events) – there is a need for a comprehensive CPD approach that would include financial, legal and other skills for foresters as well as silvicultural matters and could include online training, paper based and modular courses (over longer than a year in some cases) as well as actual events such as field days and workshops or seminars.

4.3.4 While understanding the point the reference to conserving 60ha of native woodlands p.a. is open to misinterpretation as to all other native woodlands not being conserved. Perhaps - targeted programme of active conservation on at least 60ha p.a. ?

Cross cutting measures

Page 44 refers to greater access to *forests* because of the Road Scheme. The Scheme to this year required public access to the road but not the forest (subject to opt outs for e.g. safety) and that is continued according to measure details.

Schemes

While the benefit of the de minimis aid is appreciated there may be difficulty in administration with some forest owners. It is not clear to us if afforestation and/or road grants count towards the threshold of €200,000. If so it would be important that be clear to beneficiaries.

Grant aid rates – afforestation. We note that there is no obvious change from existing rates with it seems a reduction in fencing grant (non IS436). At present our experience is that the grant rates range from inadequate to barely adequate with the result that we have significantly reduced afforestation so as to avoid loss making. That looks like remaining the position and we have particular concerns at the fencing caps.

It is not clear how the proposed scheme will (initially) “also encourage the use of improved and adapted planting stock (page 48)”. DAFM will be undertaking considerable responsibility if it directs / incentivises owners towards such stock and presumably will ensure adequate scientific justification for use of such material and will record its usage so that it can be related to its subsequent performance both in growth/yield and technical qualities.

Premiums – we are unsure of how farmers will respond to the new set of premia. The alignment of all land owners should be positive in bringing in some landowners currently deemed ineligible as farmers although interaction with, or fear of losing, social benefits could well affect the scale of that. A commitment to not impact on social entitlements that would otherwise (i.e. if not planting) be receivable (now or within the fifteen year period) would be a significant help.

We take it that 5.1.3.3. public authorities includes State owned entities.

5.1.5 Agro- forestry and 5.1.6 Forestry for Fibre – as stated earlier pilot projects for Agro-forestry would make more sense.

Regarding both schemes we have reservations about their classification as forestry and therefore the control of the land use by the Forestry Act and how that might, for instance, affect saleability of such land.

Imposing a minimum age of ten years for felling Forestry for Fibre trees seems restrictive.

Roads: the roads scheme is inadequate in a number of respects despite some actual and some apparent improvements. The overall cap of €35/m is effectively continuing to rule out roading of some sites; the VAT issue remains. The absolute cap of 20m per ha is unduly restrictive given that DAFM grant aided forests where longer distances are essential due to various factors such as layout, local road issues, topography and so on. We request that there be exceptions allowed where an adequate case is made for (a) grant rate to €45/m and (b) up to 30 metres per ha.

The change of the second instalment from 20% to 10% is a slight improvement but retains the significant additional cost for owners and DAFM in scheme administration. We request that the scheme revert to 100% grant aid after building with a declaration required post thinning similar to current Form 3.

5.1.8.6 The referring to the National Monuments Service of everything within 200m of a designated Archaeological site or monument seems excessive and could be more context sensitive and the referral should perhaps initially be to the DAFM/FS Archaeologist to determine whether further referral is necessary in line with an agreed protocol.

Soil types – Page 65 – we note that Ash, although not currently an approved species, is listed; hopefully it can be an approved species again.

5.3.1. – we welcome the greater flexibility on thinning and suggest it should also apply to the just expired scheme.

5.3.2.1 SCW – this is welcome but very restricted. We suggest it could be extended to help with density on more difficult grant aided sites and with cut-out situations on steep hills / inclines so as to improve erosion / run-off protection.

6.7 Penalties – the many proposed penalties are disproportionate and are a disincentive to service providers. The penalties are unnecessarily complicated.

Technical difficulties can and do arise, as can differences of interpretation, and to impose financial penalties such as percentages of grants is a perverse response, rather than the disincentive FS may consider them to be. The entire penalty section should be removed and replaced with a general statement that an appropriate and proportionate penalty system will be put in place in conjunction with Owner organisations, Society of Irish Foresters and Engineers Ireland to focus primarily on deliberate misstating of material fact and / or serious professional error or misrepresentation. As a principle a more appropriate response would be severe penalties for owners for fraudulent claims and some form of yellow card warning system for persistent technical breaches with, of course, right of appeal.

There is a reference to 100% penalty for dumping of materials not in compliance the Waste Management Act etc. DAFM is not the relevant regulatory authority and presumably is not claiming competence in this area. The same comment may apply in other areas.

6.9.1 In the context of penalties re the Roads Scheme reference is made to a Table from the Irish thinning Protocol Table even though it is not referred to in the Roads Scheme detail. It should be dropped from the Penalties section and such issues are inappropriate for penalties.

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