

Woodlands of Ireland Submission re Public Consultation to the Strategic Environmental Assessment of the Proposed Forestry Programme 2014 - 2020

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Introduction

In March 2014 the Forest Service went to public consultation on the imminent new Forestry Programme 2014-2020 and invited submissions from stakeholders. Woodlands of Ireland (WoI) a broad stakeholder group of native woodland stakeholders, responded in detail. As WoI has been closely involved with the development and implementation of the Native Woodland Scheme (NWS), a considerable amount of our submission concerned this Scheme and we proposed that a target of between 400 and 500 ha/yr should be set for NWS Element 1 - Conservation, which addresses the management of existing native woodlands. On September 10th, the Forest Service called for submissions on the revised Draft Forestry Programme as part of the Strategic Environmental Assessment (SEA).

It is encouraging to see that the Draft Programme places considerable emphasis on the positive environmental impact of the Programme. It also incorporates many of the aspirations outlined and actions recommended in 'Forests, products and people: Ireland's forest policy - a renewed vision'. However, it is disappointing that the programme falls short of its promises, particularly with regard to the NWS. The target area for NWS El. 1 was reduced from 360ha/yr to 30 ha/yr in the Forestry Programme by the Forest Service after the SEA was completed. If implemented, this will render this part of the NWS redundant with serious implications for the Scheme, the forest industry, native woodlands, conservation, heritage and forestry policy. In particular, compliance with the RDP rules could be compromised unless a serious commitment is given to meaningful biodiversity targets, which can primarily be achieved under the NWS, particularly NWS El. 1.

Rationale for revising proposed targets

WoI believe that at a minimum the original target area of 360ha/year for NWS El. 1 throughout the Forestry Programme should be reinstated and further increased to 450 ha/yr for the following reasons:

- between 500 to 1000 hectares is the projected demand for this Scheme based on applications received between 2002 and 2007 before the Scheme was frozen in 2008. Up to 2009 the area of woodland improved under NWS El. 1 was 4,427ha, an average of 585ha per year. This is quite an impressive figure for an 8 year period but it represents only about 4% of the total area of native woodland: a very much larger area requires restoration
- there are five native woodland habitat types designated under the EU Habitats Directive. Only four priority habitats are mentioned in the Programme. The fifth, Old Oak Woodland, while not a priority habitat, is the most extensive. It is subject to a number of threats, particularly invasion by *Rhododendron ponticum* and overgrazing. Its conservation status is still rated as being 'bad' despite some improvement due to implementation of Element 1 of the NWS. Inaction on addressing these management issues must be considered a threat
- the Forest Service and other government agencies will be obliged to manage invasive species typically found in native woodlands, such as rhododendron, cherry laurel and Japanese Knotweed, under an imminent EU Directive due to come into force early in 2015
- in order to meet national obligations re Priority Woodland Habitats, particularly re reporting under Article 17 of the EU Habitats Directive, i.e. Yew Woods, Residual Alluvial forests, and Bog Woodlands, resources far greater than those proposed need to be directed in order of priority to
 - a) high biodiversity value Annex 2 'Ancient' and 'Old' native woodlands, and
 - b) existing degraded riparian native woodlands

This is particularly pertinent as the proposed target area under NWS El. 1 is totally inadequate to achieve this objective and will fail to achieve biodiversity objectives required under NATURA 2000, the EU Biodiversity Strategy or climate change mitigation

- in order to meet obligations in high status water bodies under the Habitats and Water Framework Directives, and national forest policy restructuring/replacement of conifer plantations in Aquatic Buffer Zones (ABZs) designated for Freshwater Pearl Mussel, salmonids

and/or where water quality for domestic consumption is to be maintained/enhanced, a greater target area than those proposed is required

- to address investment into the natural capital assets of native woodlands, most of the value of which are non timber benefits and estimated to be worth c. €140m/annum* and which Ireland is obliged to integrate into national accounts by 2020 under the EU Biodiversity Strategy
- abandoned scrub woodland and non-designated old woodland comprising predominantly of native trees and shrubs, that contributes towards national landscape policy objectives, i.e. woodland connectivity at catchment level, should also receive funding which will also improve viability, focus on bringing them into productivity via timber/wood quality management and support the craft sectors associated with the specialised and appropriate of these woodlands, i.e. hazel, birch, alder and oak coppicing, and
- to retain the expertise in the forestry sector developed over the past decade or so to implement the NWS effectively, i.e. training and technical support provided to foresters, ecologists, woodland contractors and the nurseries, which will otherwise be lost unless a minimum critical amount of NWS El. 1 projects are addressed annually. This expertise also has positive spin-offs more widely in the forest sector, especially re practical biodiversity management and planning.

*Bullock, C. & Hawe, J. (2014). *The Natural Capital Values of Ireland's Native Woodland*. Woodlands of Ireland, Dublin. pdf available at: www.woodlandsofireland.cm/publications

Proposed Solutions

The scheme should be re-opened up to the public and private sectors as was the case prior to 2006. To achieve a target of at least 360 ha/yr and ideally 450 ha/yr to address the above, the following is suggested:

- allocate whatever resources are finally agreed for NWS. El. 1 on a strategic target area basis in order of priority to: 1) Priority, Annex 2 woodlands designated under the Habitats Directive 2) retrofitting ABZs from conifer to native riparian woodland adjacent freshwaters designated for Priority species and high status water bodies 3) Old Oak woodlands 4) emerging native woodland (scrub), and finally 5) 'community' native woodlands for recreation, education and biodiversity
- in the case of the public sector the maximum grant aid for NWS El. 1 could be set at €2,500/ha as organisations such as Coillte and NPWS could match funds through 'benefit-in-kind' via staff, technical support, etc. This would free up resources for more private sector applications
- where retrofitting ABZs reduce the grant rate to €2,500/ha for all applications as operational costs are almost certainly much lower than in old woodland sites. This would double the target area for these applications under NWS El. 1
- reduce the grant rate to €2,500/ha for recently developed emergent native woodland (scrub <25 years) as the operational costs are likely to be much lower for these woodlands, i.e. management plan, fencing, thinning and removal of occasional exotic species. Increase the focus and objectives toward wood/timber production and firewood. This would double the target area for these applications under NWS El. 1
- look at reducing the target area for the Woodland Improvement Scheme by assessing the annual average area applied for and managed under this Scheme during the last forestry programme and setting future, realistic targets accordingly
- reduce NWS El. 2 from 500 ha/yr to 400 ha/yr and transfer the capital grants and projected premiums to NWS El. 1. A target of 400/ha/yr for NWS El. 2 reflects the current and recent demand since 2012. This would free up over 100 ha/yr
- allocate one third of the NeighbourWood Scheme budget and projects to native woodlands by specifying that applications are invited for sites that qualify under NWS El. 1 criteria. In addition, reduce the capital grant rate for woodland management in this Scheme by 50% for public bodies such as Coillte and local authorities to generate more potential projects. This is estimated to yield up to 50 ha/yr for NWS El. 1
- finally, in order to achieve the target area of 450ha/yr for NWS El. 1 reduce the conifer afforestation target area. This is unlikely to exceed more than 100/ha/yr which in the overall

context is very little. Furthermore, the increasing conifer afforestation targets over the duration of the programme are unrealistic given past performance and land availability constraints

Related suggestions to the above include:

- Provide flexible minimum to maximum target areas for all forestry schemes so that resources can be diverted from one scheme to another as the forestry programme is implemented
- The current oak premium is leading to oak-dominated new native woodland plantations under the oak GPC which is not ecologically appropriate. Furthermore, most other forestry Schemes have their own premiums whereas there are three GPCs that apply to the NWS, i.e. other broadleaves, oak and alder. WoI propose a flat rate GPC for NWS El. 2 called the 'Native Woodland Establishment GPC' which would increase the Scheme's visibility, improve the ecological integrity of new native woodlands planted under NWS El. 2 and take pressure off the stocks of native oak plants in nurseries, which are inconsistent due to irregular masts. The result would be new native woodlands that comprise the maximum diversity of native trees and shrubs with respect to the relevant native woodland type appropriate for the site. This would also result in premium savings that could be included in the NWS El. 1 budget.

Woodlands of Ireland support

There are some in the forest sector that have reservations about the application of the NWS El. 1 format. This was revised in 2008 just prior to this Element being frozen. To date, the new format has never been trialled. It will make it easier to apply by foresters, contractors and Forest Service Inspectors to oversee its implementation efficiently. To this end, WoI

- will actively promote the new format in partnership with the Forest Service and continue to feedback suggestions regarding any perceived problems that might arise
- propose that a checklist be drawn up for Forest Service Inspectors of operations agreed in NWS El. 1 plans to ensure continuity and consistency in the application of the Scheme across all the regions. The checklist can be developed by Forest Service and the WoI Native Woodland Technical Group and include cost validation, value for money indicators and a photographic record before and after operations are carried out
- will, in partnership with the Forest Service, continue to train stakeholders and facilitate the accreditation of foresters working on the NWS. Technical support via the production of guidance notes and initiatives to tackle specific native woodland issues across all sectors as they arise will also be addressed, and
- will explore the possibility of public-private sponsorship of native woodland projects to reduce the input from the public exchequer.

Comments related to specific sections in the Draft Forestry Programme

- Measure 6 in the Draft Forestry Programme is largely redundant and the objective to '*Optimise the environmental and social benefits of ~~new and~~ existing forests*' is seriously compromised with reference to semi-natural woodlands. Similarly the goal to '*Collaborate with other organisations to deliver policies on environmental sustainability and biodiversity*' is seriously undermined, especially as the target falls far short of those in the 2nd National Biodiversity Plan and the aspirations of environmental NGOs.
- 2.1.4 *Ireland's Prioritised Action Framework (PAF) For NATURA 2000*, i.e. Priority measures for NATURA 2000 set out under Ireland's Prioritised Action Framework (version 2, 2014) (pg 10) and includes the following:
 - *Development of measures, within appropriate schemes, to improve conservation condition and consolidate existing woodland habitats and increase connectivity.*is now also largely redundant as a result of the reduction in target area for NWS El. 1.
- 2.1.3 '*Support for native woodland establishment and conservation will contribute to the expansion, protection and enhancement of Ireland's native woodland ecosystems*'. The area under NWS Element 1 is totally inadequate to achieve this objective and will fail to achieve biodiversity objectives required under NATURA 2000 (2.1.4), the EU Biodiversity Strategy (2.2.4) or climate change mitigation (2.2.3).

- 2.2.3 EU Forest Strategy and specifically *Forests in a changing climate* (pg 15) and 2.2.4 EU Biodiversity Strategy (pg 15) the statements:
 - *Conservation of existing forests under the conservation element of the Native Woodland Scheme*
 - *the appropriate restoration management of existing native woodlands (including conversion of non-native forest to native woodland) (NWS Conservation)* should be removed as there is inadequate provision for this Measure.
- 2.2.4 EU (Biodiversity Strategy)/4.4.1 (Cross-cutting measures – Environment). The 15% open space/retained habitat should, as far as possible, be at a landscape level, not based on 10 ha units as this would result in large numbers of small, often ecologically isolated areas which would also be hard to manage.
- 2.2.7.1 There are 5 native woodland habitat types designated under the EU Habitats Directive. Only the 4 priority habitats are mentioned. The fifth, Old Oak Woodland, while not a priority habitat, is the most extensive. It is subject to a number of threats, particularly invasion by *Rhododendron ponticum* and overgrazing. Its conservation status is still rated as being ‘bad’ despite some improvement due to implementation of Element 1 of the NWS. While it is true to state that forestry, per se, is not a key threat to these woodland types, inaction on addressing these management issues must be considered a threat.
- 3.1.4. Priority 4 SWOT. ‘Weaknesses’ should include reference to fact that many native woodlands are damaged by invasive non-native species and/or overgrazing.
- 5.4 There should be mention of invasive plant species. See also SWOT priority 4. *Rhododendron*, for example, threatens biodiversity and reduces the value of ecosystem services, e.g. along rivers.
- Table 5.1.6.1 Italian alder is *Alnus cordata*. *A. glutinosa* is common alder.
- Ecosystem is one word. It is often written as eco-system

Proposed text insertions to the Draft Forestry Programme

The following suggestions are made regarding the text of the Draft Forestry Programme:

- Under Section 2.2.4 EU Biodiversity Strategy insert: *The Native Woodland Scheme underpins the commitment by government to account for natural capital values in national accounts by 2020 as stipulated in the EU Biodiversity Strategy by investing in native woodland assets which provides timber, non-timber and public goods values. These include biodiversity, recreation, carbon sequestration, protection of water quality, public health and quality hardwood. The investment made under the NWS can readily be applied to the ‘costs’ side of the balance sheet.*

Conclusions

With regard to NWS El. 1, the target of 180 ha over the lifetime of the Programme is totally inadequate and will lead to a failure to meet the biodiversity objectives required under NATURA 2000, the EU Biodiversity Strategy, as well as national forest and biodiversity policy goals. To put the area in perspective, 180 ha is less than the area of both Vale of Clara and Glengarriff Nature Reserves, and about a tenth of the area of the Killarney woods. Coupled with NWS El. 1 being frozen since 2008 the proposed targets would result in a negligible area of existing native woodland being managed for over a decade by 2020. The finalised Forest Programme provides an opportunity to rectify this situation.

The combined total of the WoI proposal re NWS El. 1 & El. 2 amounting to 450 ha for El. 1 and 400 ha for El. 2 per annum and hence 5,100 hectares in total over the entire Programme, amounts to just under 9% of the entire target area in the current proposed Programme at c. 57,000 hectares. Though small it represents value for money in addressing the broad range of objectives outlined in the Forestry Programme and in national forest policy, especially biodiversity and other non-timber policy areas and associated targets.

Woodlands of Ireland has consulted with its Steering Group and key members of its Technical Working Group in drawing up the above recommendations. The positive progress made in this sector over the past decade can be maintained by adopting the proposed measures. They are firmly believed to be the minimum required to ensure the practical implementation of the NWS, especially El. 1. If adopted, this would yield tangible benefits for the Forest Service, related national and EU policy, landowners, the forest industry, local heritage and native woodlands.