



IRISH TIMBER GROWERS ASSOCIATION

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Irish Timber Growers Association submission on the draft FORESTRY PROGRAMME 2014-2020

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The Irish Timber Growers Association (ITGA) was established in 1977 and is the national representative body of private woodland owners in Ireland. The membership of the Association mirrors the wide range of different timber growers in the country and current membership includes farm forest owners, forestry co-operative members, private woodland estates, forestry investors and forestry pension funds. This wide range of membership allows the Association take a broad view of the industry and issues facing the sector.

The Irish Timber Growers Association wish to make the following comments on the draft new Forestry Programme 2014-2020;

Measure 1: Afforestation and Creation of Woodlands

The Department's use of *de minimus* funding for additional premium payments to increase the 12 annual premiums to 15 is welcomed.

The programme's objective aims to increase the area under forest in Ireland from its current low base of 10.7% is also welcomed, however, the projected total afforestation figure for the 6 year period of the plan is significantly lower than that recommended in the report and recommendations of the Forest Policy Review Group launched by the Minister in July. In the draft new Forestry Programme over the 6 year period of the plan, the average annual projected planting is 7666 ha/annum of which afforestation is only 6950 ha/annum. The report of the Forest Policy Review Group states in Strategic Action 1.1, that 'the afforestation target will be 10,000 ha per annum up to 2015 and 15,000 ha per annum for the period 2016 to 2046.' The proposed targets in the draft New Forestry Programme therefore fall well short of those recommended in the Forest Policy Review Group Report and will therefore not achieve the targeted increase in forest cover of 18% by 2046.

The new Agro-forestry Scheme is timely as is the Forestry for Fibre Scheme, however, both are unlikely to be favoured by landowners as they will be classified as forest land and the provisions of forest legislation will apply with the areas subject to the replanting obligation.

Measure 2: Investments improving the Resilience and Environmental value of Forestry: - NeighbourWood Scheme

The NeighbourWood Scheme is welcomed especially in partnership with local community groups. The three separate elements of the scheme make the scheme flexible and applicable to a range of forest holdings. The scheme would lend itself to supporting a variety of applications that may only require one or two elements of the scheme.

Measure 3: Investments in Infrastructure: Forest Road Scheme

The importance of getting thinnings and fellings to market has been stressed by the Irish Timber Growers Association for many years. In this regard, the absorption of costs for bellmouths, lay-bys, drying areas and non grant aided special construction works within the overall road grant allocation for potential sites are welcome additions to the scheme. The special construction works (SCW) grant for sensitive areas and the funding to connect to other existing forest road networks are also to be welcomed.

The cost of building forest roads however is generally considerably more than the maximum grant payment of €35/ metre as proposed in the measure and this may be a small percentage of actual roading costs for many sites particularly those on peaty soils or soils with low ground bearing capacity. The maximum grant rate should therefore be revised upward to ensure access is achieved on these sites with high roading costs.

Measure 4: Prevention and Restoration of Damage to Forests: - Reconstitution Scheme

The Irish Timber Growers Association welcomes the reintroduction of this important scheme contributing to the costs of restoring forest potential as a result of damage, or potential damage, from disease outbreaks.

ITGA welcomes the broadening of the scope of this scheme to potentially include forests damaged by other natural causes, catastrophic events and/or climate change related events, such as frost, deer, grey squirrel and vole, where more than 20% of the forest potential has been damaged. The Irish Timber Growers Association proposes that the reconstitution scheme also includes forests damaged by fire.

In relation to forest fire, the Irish Timber Growers Association (ITGA) have become concerned about the proposed burning of large areas of commonage in relation to the new GLAS Scheme and the significant fire risk that this practice will pose to our country's forests. In recent years, areas of woodland have been damaged by fire and such large scale burning under GLAS will substantially increase this risk particularly in the highest fire risk areas. The report in the Irish Farmers Journal dated 4th October (P.8) that the 'huge areas of commonage that are now overgrown would have to be brought back to grazing condition, including by controlled burning, and this will be stipulated in CMPs', (Commonage Management Plans) will increase risk of forest fires in already high risk areas and potentially increase forest insurance costs and ultimately insurance availability.

ITGA take this opportunity to draw this situation to the attention of the Department in the context of the need to include fire damage in the reconstitution scheme. When the Departments' Code of Practice for Prescribed Burning was launched in 2012 by the Minister of State for forestry at the time, Shane McEntee TD acknowledged that 'as experience has shown us when such fires get out of control, they become the source of many forest fires'.

The fact that the new GLAS Scheme is now promoting burning of vegetation in such high forest fire risk areas is contradictory and of considerable concern.

Measure 5: Investments improving the Resilience and Environmental value of Forestry: - Woodland Improvement (Thinning and Tending- Broadleaves)

The woodland improvement (Thinning and Tending of Broadleaves) scheme is of significant importance to the management of the broadleaf estate. The provision of financial support to forest holders towards the cost of woodland improvement works associated with tending and thinning of forests planted since 1980 under the Forestry Programme 2014-2020 is very much welcomed. Provision for brashing to improve access for manual application of fertiliser where aerial fertilisation is not possible is also commended, as is the funding for support actions within existing forests, which effect structural changes that will proactively protect and enhance water quality, archaeological sites, habitats and species, and sensitive landscapes.

The objective to support the thinning and tending of 9,000 ha of broadleaf and mixed forests each year under the programme is of significant importance to the sector.

Measure 6: Investments improving the Resilience and environmental value of Forests: - Native Woodland Conservation Scheme

Native Woodland Conservation Scheme (NWS Conservation) in conjunction with the Native Woodland Establishment Scheme are necessary schemes within a national forestry programme. However, the numerous restrictions and regulations mean that these schemes are unlikely to attract a large number of woodland owners. The availability of these schemes for conversion of conifer high forest to native woodland may be of interest to forestry owners in sensitive areas where there is sufficient funding available.

Measure 7: Knowledge Transfer and Information Actions

The Irish Timber Growers Association welcomes the fact that the Forestry Programme 2014-2020 addresses *Need Number 3: To support private forest holders in actively managing their forests.*

The Irish Timber Growers Association is well known and recognised for the information and representation services that it provides to the sector and industry. Organisations such as ITGA who have been providing information services for decades can only do so through membership subscriptions and the support of its membership. For any industry to be self supporting it is vital that such independent and self sustaining organisations are encouraged and fostered for the betterment of the sector. On page 88 of the New Forestry Programme under 5.7 Measure 7: Knowledge Transfer and Information Actions, four strands of measures under this heading are outlined including;

- (a) Knowledge Transfer Groups (KTG)
- (b) Continued Professional Development (CPD)
- (c) Targeted Training
- (d) Advisory Services

However, it is clearly stated that ‘Membership of a producer group is not a condition for access to the services described above’.

This lack of acknowledgement for membership organisations such as ITGA who have been and are endeavouring to develop with the sector acts to undermine their ability to be self

sustaining into the future. Where the New Forestry Programme clearly states that it will provide funding for the above without any financial or membership commitment from the beneficiaries does little to make existing membership organisations more financially independent or sustainable. In this regard, ITGA would highlight the findings (see discussion and conclusions P. 38 & 39) of the Report undertaken by CEPF (Confederation of European Forest Owners) entitled 'European Forest Owner Organisations, Forest owner Cooperation: Main figures, aims and goals,' (Sept 2008).

The Irish Timber Growers Association welcomes the ideas behind the Knowledge Transfer Groups. However, FETAC accreditation alone is no basis for effective transfer of knowledge. There is a lot to be gained from accessing a wide knowledge base in the form of past experience, past actions and performance. Organisations such as the Irish Timber Growers Association have over 37 years of experience in organising field events, conferences, forestry shows, newsletters and more importantly have driven major initiatives such as the Model Timber Sales Dispatch System, the Template Master Tree Sales Agreement, the Private Roundwood Price database, etc for the benefit of private woodland owners. This experience should be drawn on and encouraged rather than set aside. The New Forestry Programme should not encourage duplication and replication of existing services and bodies as sources of forestry information and representation. Organisations like the Irish Timber Growers Association could play a vital role in providing modules within the KTG programme as well as provide information targeted at individual forest holders and farmers under the Advisory Services Scheme.

The role of knowledge transfer through the internet should also be looked at under this scheme. Established websites such as the Irish Timber Growers Association website www.itga.ie as well as other forestry websites could be instrumental in disseminating important forestry information to growers and the industry.

Measure 8: Setting up of Producer Groups

Financial support towards the cost of establishing forest producer groups for the first 5 years is commendable. It is also important however that national growers groups are supported so as to ensure information and representation functions can be undertaken at national level where this adds to efficiencies and economies of scale as outlined below.

A strong case can be made for establishing co-operation between producer groups and growers organisations to ensure no costly and inefficient replication of initiatives is taking place nationally. New groups can learn from established groups and organisations. Certain overlap in tasks can be streamlined and duplication should be avoided so as State funding is not wasted. There is little point in each group being funded to undertake many of the same or very similar services. Measure 8 should ensure that new groups do not receive funding allocation for the duplication of existing services which are being provided by existing organisations. A condition of financial support under the measure for such groups might be for them to work with existing organisations that provide such information/services. This would ensure best value for money for State expenditure. For example, the 200 page ITGA annual Yearbook, the 16 page ITGA newsletter, the Model Timber Sales Dispatch System, the Template Master Tree Sales Agreement and other ITGA initiatives should be employed by KTG, producer groups, etc without being replicated by each with funding assistance from the Forestry Programme. The New Forestry Programme should facilitate such efficiencies by having a requirement that such existing services and information are utilised rather than replicated.

In this regard it is important to note that the objectives of this measure, as included in the draft New Forestry Programme, are the same objectives as being addressed by ITGA at a national level:

i.e. 5.8.3 Objectives

Broad objectives under this measure would include the following;

- *Encourage private forest holders to management their forest jointly on a geographical basis;*
- *Increased viability will encourage holders to actively manage their forests*
- *Increase knowledge transfer between forest holders and registered foresters particularly to ensure that their operations protect and enhance the environment;*
- *Bring more privately owned timber resource to the market;*
- *Increase thinning rates will maximise the quality and value of the final harvest; and*
- *Help ensure a constant supply of quality timber to sawmills and processors;*
- *Promote the use of cooperative road construction between multiple forest owners.*

–ITGA initiatives such as the Model Timber Sales Dispatch System, the recent Template Master Tree Sales Agreement, the ITGA Timber Price database, ITGA Newsletters, the ITGA Yearbook, ITGA field days and website all aim to help achieve the above objectives of Measure 8 at a national level. Future funding measures should ensure that such existing services are employed and a funding structure put in place to facilitate this so as not to exclude national organisations. For the Forestry Programme to provide funding to replicate or replace such initiatives would be detrimental to the development of the sector and the establishment of viable sustainable national organisations.

Producer groups therefore should be encouraged to operate under or in conjunction with a national umbrella organisation for the delivery/dissemination of knowledge and information to their groups and for the feedback and transfer of knowledge between these groups and other growers and growers' organisations. Such optimum use of funding would ensure no duplication of the same or similar activities for the various groups to be funded which could be provided more efficiently by a national umbrella body at a reduced cost with economies of scale. The linking of these producer groups with other organisations is a real opportunity both for the benefit of the producer groups themselves and for the benefit of all growers nationally. Such collaboration would also ensure the most efficient use of the Departments and the sectors resources in relation to representation at a national level.

Measure 9: Innovative Forest Technology

ITGA welcomes this measure, however limiting the grants to up to 40% of eligible expenditure may act as a disincentive, especially where significant investments in new technology are to be made. Possibly this measure should be viewed on a case by case basis and level of grant aid should be determined by the business plan submitted, how likely the technology would be adopted by forest holders or contractors and the overall usefulness/importance of the technology to the sector.

Measure 10: Forest Environment and Climate Services: -Forest Genetic Reproductive Material

This measure may be better suited under a research programme where longer term monitoring and testing of genetic material can be undertaken.

ITGA welcomes the broadening its scope to include coniferous species.

Measure 11: Forest Management Plans

The inclusion of this measure is a welcome addition to the Forestry Programme 2014-2020 where the recommendations of the COFORD Forest Management Plan (FMP) Working Group are taken into account and FMP requirements are improved in such a way as to reduce the burden of paperwork for forest owners and forest managers. The Department should consider a possible link in with Certification Requirements, Online application/submission through IFORIS and a link with Felling Licence and Roding applications which would significantly reduce the burden of paperwork on applicants and streamline the processing of the various applications.