



*An Roinn  
Ealaíon, Oidhreachta agus Gaeltachta*  
*Department of  
Arts, Heritage and the Gaeltacht*

*National Parks and Wildlife Service  
7 Ely Place,  
Dublin 2*

13<sup>th</sup> October 2014

**Re: Consultation on the Forestry Programme 2014 – 2020**

**Submission by the Department of Arts, Heritage and the Gaeltacht on the Native Woodland Scheme**

Dear Sirs,

The Department of Arts, Heritage and the Gaeltacht welcomes the opportunity to make observations on this element of the Forestry Programme.

These observations are made in the context of

1. the report to the EU on the status of habitats and species in Ireland, submitted in 2013 under Article 11 of the EU Habitats Directive;
2. the *Prioritised Action Framework for Natura 2000*; and
3. the National Biodiversity Action Plan 2011-2016
4. the legislation concerning invasive alien species, both in Irish legislation (regulation 49 of the European Communities (Birds and Natural Habitats) Regulations, 2011) and the new EU Regulation on invasive alien species adopted by Council on 29 September 2014 last, that will relate to a list of “species of Union concern”.

1. The “Article 17 report”<sup>1</sup> provides information on 58 habitats listed in the Habitats Directive and occurring in Ireland, including four woodland habitats: Old Oak Woodlands, Bog Woodland\*, Residual alluvial forests\* and *Taxus baccata* woods\*. Three of the four are considered in “bad” status, although with a trend towards improvement. The only exception, with good status, is bog woodland which is spreading on cutaway bogs. The three habitats marked with an asterisk above are “priority” habitats under the Directive, requiring particular attention; however Old Oak Woodland is arguably of equal importance in Ireland, given the small area of native woodland in the State.

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<sup>1</sup> <http://www.npws.ie/publications/article17assessments/>

(A fifth woodland type, occurring on limestone pavement, is recognised as a subset of the limestone pavement habitat.)

The Habitats Directive requires Member States to put in place measures to maintain or restore habitats towards favourable conservation condition, and it is expected that the EU will require Member States to show what measures have been introduced. The main causes of bad status are the small size of many woodlands, so that they do not function fully as woodland ecosystems; fragmentation of habitat; invasive species; overgrazing leading to failure to regenerate and in some cases undergrazing. Measures are therefore required to counter each of these threats, and the Native Woodland Scheme would be particularly appropriate in this regard.

2. The Prioritised Action Framework for Natura 2000 was drawn up in consultation with key Government Departments and agencies (including important inputs from DAFM), and other stakeholders. It identifies a range of actions required to be taken to help improve the status of Ireland's EU protected habitats and wildlife, but does not of itself provide the means for funding such activities. The Native Woodland Scheme is identified as an important element in the conservation of woodland Special Areas of Conservation: *“The priority woodland habitats (91D0, 91E0, 91J0) require measures such as management of invasive alien species and control of grazing (including by deer). It is proposed that deer management in Natura 2000 will be part of an overall national deer management strategy. Fragmentation of Annex I woodland habitats needs to be addressed by encouraging woodland expansion both within and beyond Natura 2000.”*

As well as maintaining existing woodlands, the creation of connectivity between habitat patches is sought under Article 10 of the Directive, and the Native Woodland Scheme has great potential in this regard.

3. The National Biodiversity Plan 2011-2016, approved by Government, includes the following actions:

5.06 Continue to promote the Native Woodland Scheme which features establishment and conservation elements aimed at encouraging the development and conservation of native woodlands.

10.05 Maintain target of 30% broadleaf planting in afforestation

10.06 Continue to update the inventory of native woodlands; review and, where appropriate, incorporate the results of the Native Woodland Survey into the conservation and expansion of the native woodland cover.

In the draft Interim Review of the implementation of the Plan, the contribution of the Native Woodland Scheme, in particular as planned in regard to pearl mussel rivers, is noted. The value of native broadleaf woodland in improving water quality is also noted.

4. There exists a requirement on owners of lands not to allow the spread of invasive species listed in a schedule of the Birds and Natural Habitats Regulations. This requirement is likely to be reinforced for some species with the recent adoption of the EU Regulation on invasive species. Under the EU Regulation, three types of interventions are required: prevention, early warning and rapid response, and management. The first task however is for a “list of invasive alien species of Union concern” to be drawn up by the Commission with Member States, using risk assessments and scientific evidence. The regulation envisages that species of concern will be alien to the territory of the EU, thus

excluding many species native to parts of Europe which may be perceived as aliens in other parts. These pieces of legislation create additional responsibilities for woodland owners and managers which could usefully be addressed with the assistance of NWS Conservation.

## **Recommendations**

In the light of the above, the Department of Arts, Heritage and the Gaeltacht views both the establishment and conservation elements of the native Woodland Scheme as critically important tools in addressing the requirements of the Habitats Directive. However, the Department recommends a significant increase in the target for hectareage of woodland managed under NWS Conservation, with an accompanying increase in dedicated funding; and increased targeting of NWS Establishment in order to address issues around the size and fragmentation of Habitats Directive woodland types.

In particular it is recommended that the Forest Service

- considers substantially increasing the overall target area set for the native Woodland Conservation Scheme, from 30 ha to at least 400 ha/yr
- would afford prioritised access to the NWS Conservation Scheme to
  - projects in SACs containing the four woodland habitats and/or relevant freshwater species listed in the Habitats Directive
  - projects on woodlands containing any of the four woodland habitats listed above, as well as to riparian woodland along pearl mussel rivers; and
  - to provide for conversion from conifer to broadleaf woodland along pearl mussel rivers
- would prioritise allocations under NWS Establishment to allow for the enlargement of woodlands of the four types listed in the Habitats Directive, particularly adjacent to woodlands within SACs listed for those habitats

It would be useful to further discuss such targeting. DAHG can provide shapefiles and other data in regard to designated areas with these habitats and species.

It would also be useful to convene a meeting with relevant experts to discuss specifically the issues surrounding yew woodlands.

Yours sincerely

Dr Ciaran O'Keeffe

Science and Biodiversity Section