

Submission of the Society of Irish Foresters

Draft report of the Forest Policy Review Group

Forests, Products and People: Ireland's Forest Policy – A Renewed Vision

The Society of Irish Foresters welcomes the publication of the Draft Report of the Forest Policy Review Group. The publication of this document is important and timely as it is the first comprehensive review of forest policy in Ireland for almost twenty years.

This report is comprehensive and addresses most of the important issues affecting the development of the sector in Ireland. The Society of Irish Foresters welcomes all of the recommended policy actions as detailed in the report. However we are deeply concerned that the planting programme, in particular the difficulties now being encountered in sourcing the land needed to maintain, never mind increase, the annual planting programme, deserve a much stronger mention here. Industry expansion and the avoidance of mid century timber supply shortages are critically dependant on the immediate resumption of a significantly larger planting programme.

The Society feels a greater emphasis should be accorded to the recommendation relating to Research and Education, especially forest products research aimed at adding value to our timber. We feel that the role of Teagasc Forestry Development as one of the principal suppliers of training to forest owners is not adequately recognised in the Strategic Actions, neither is its important role in forest research and development. We welcome the retention of the COFORD Council in the proposed structures, Strategic Action 7.11, p 44.

The future role and function of Coillte should be addressed in a transparent manner in the context of this report. We believe that the proposed amalgamation of Bord na Móna and Coillte is a retrograde step. These companies have different sets of values and core objectives – one is developing a renewable, sustainable resource; the other is exploiting a diminishing resource. While forests can and do produce wood for energy and forest sites are suitable for wind energy generation, the core objective of the sector is to produce wood.

It is our belief that the potential of the sector will not be fully realised unless a framework is in place to ensure that the review's goals are realised. In this regard we particularly welcome proposed Strategic Actions 9.1 & 9.2 in relation to the setting up of a Forest Council and a development/promotional body for forestry in Ireland.

These actions have the potential to inject a much needed, professional input to the identification of developmental opportunities for forestry. They can also provide a proactive organisation or forestry board/agency with the expertise and independence to develop a sustainable future for the sector in Ireland, including its research needs. Such a body would also have the expertise to drive the sector to optimise its benefits and value throughout the forest chain including its real costs and benefits, its position in relation to other land uses, investment opportunities, environmental benefits, research requirements and issues relating to timber supply and demand.

The Society of Irish Foresters also makes the following comments/recommendations:-

- **1.11 – Climate change** – It is largely accepted by the forestry sector that climate change will impact on Ireland’s forests in the future. However, while models have been developed to provide a decision support system advising on species choice under different climatic change scenarios, these remain a theoretical exercise with, as yet, little or no practical implementation. While it is difficult to predict precise changes, broad policies regarding species choice are required now to take account of the likely changes in climate. For example targeting species suited to drier conditions such as Douglas fir, pines and larches in the south east rather than continuing to plant Sitka spruce which is likely to suffer moisture stress and reduced production levels. Mechanisms must be put in place to ensure that species choice is appropriate for the region and that species changes are monitored
- **1.14 - Improved genetic material** – While the importance of the use of improved genetic material is stressed in the policy document, the future of the breeding programmes remains uncertain. Tree breeding programmes are long term investments that require continuity of funding, expertise and security of the genetic material. These requirements are essential if the considerable investment already made in tree breeding is to be realised. The national tree breeding programmes should therefore come under the direct control of the department of Agriculture, Food and the Marine (DAFM) in order to ensure their continued existence and operation.
- **2.10 - Awareness and promotion of alternative silvicultural systems.** Currently, the commitment to Continuous Cover Forestry (CCF) in state owned forests is largely confined to broadleaves while most conifers continue to be managed under the clearfelling system. State forests are ideally suited to demonstrate the benefits of CCF as they have long-term management plans, are managed by professional foresters, normally remain in the same ownership and contain large areas of established forest of various ages. A number of forests (rather than stands) should be managed under CCF in suitable areas of the Coillte estate. These should be managed with commercial objectives and act as demonstration areas/models of excellence for the sector.
- **2.13 – Monitoring schemes** – While much data are collected and reported under various monitoring schemes, these data have yet to be collated to provide a measure of the sustainability of Ireland’s forests. The National Forestry Standard provides a comprehensive reporting framework for sustainability but remains unused since its publication in 2000. It is therefore recommended that the national Forestry Standard would be used as a template for reporting periodically (every five years) on the state of Ireland’s forests, including trends, etc.
- **8.2 - Forest certification** – Market demand for certified timber acts as a driver for forest owners and growers wishing to get their forests certified under one of the recognised forest certification schemes (FSC or PEFC) operating in Ireland. While Coillte has been certified for over a decade, private forestry owners have yet to become fully engaged in the process as many of their forests are at a pre-

harvesting stage. However, as their plantations mature there will be an increasing number of growers seeking certification. Currently DAFM considers forest certification to be a market initiative and, while accepting its usefulness, does not use it as a means of verifying compliance with best practice. As the private forestry estate expands and develops and forest operations (road building and harvesting) become more frequent, monitoring compliance in thousands of properties will be a major undertaking for DAFM. Officially recognising the certification process as a means of monitoring compliance would allow DAFM to monitor many of these areas for best practice.

- **13.3 - Annual Report** – The proposed publication of an official annual report for forestry is a welcome development. Since the publication of the last Ministerial Report in the late 1980s, reporting of Irish forestry statistics has been ad hoc and produced by several different organisations such as DAFM, Coillte, COFORD, ITGA and others. Ideally, publishing should be done on the web as an interactive facility on the DAFM website. Also, historical data for the years from the last Minister’s Report to the date of the new report should also be published to provide a continuous series of official records.
- **Promotion of forestry** – Forestry like other sectors requires a sustained effort to raise awareness and promote the benefits of the enterprise. Currently, a number of organisations are promoting various aspects of trees, forests, forestry, timber etc but this is being done sporadically and without a discernible overall strategic direction. We believe DAFM has an important coordinating role to play in this regard. An annual programme, carried out in conjunction with the organisations promoting various aspects of forestry, would provide the necessary focus to ensure that the sector is promoting key messages to targeted audiences on a coordinated and sustained basis. A key aspect of promoting forests as a societal benefit will be to focus attention on the non timber values; for example, increasing biodiversity, facilities for healthy recreation, clean water and air, access to the countryside and areas of scenic amenity.
- **Time Frame for implementation** – The Forest Policy Review, as it stands, is a comprehensive and well constructed document but it is an open-ended document without a timeframe for completion. While it is acknowledged that it will take many years to achieve some of the strategic actions proposed, the Forest Policy Review should cover an indicative period (5-10 years) during which the actions will be implemented. There should also be provision for periodic interim reviews of progress. Otherwise, there is a danger that it will become an aspirational document rather than a concrete plan for the future.
- **Expansion of the forest resource area, page 12** – The terms “unenclosed land” and “area differential” would benefit from explanatory footnotes and should also be included in the Glossary on page 92.
- **Underperforming forests/uneconomic forests** – The options for these forests and their management should receive more discussion in the review document. Strategic Action 3.8 (page 28) does consider these forests but in a quite limited way, addressing only “peat areas currently afforested **which are to be deforested** to mitigate continued environmental degradation” Strategic Action 3.2 (re

guidelines that address “water quality, fertilisation and biodiversity”) is also relevant. Nevertheless all of these forests require a strategy which acknowledges their complexity, problems and opportunities. All decisions with regard to underperforming forests must take into account the impacts that their removal or modification will have on carbon sequestration.

- ***Whose interest governs: National or Owners’?*** – The important question of whether it is the national interest or the owners’ interest which dictates the major strategic decisions relating to forests deserves further discussion here. Examples of such important decisions are whether or not to clearfell, and if so, when to clearfell and the method and species to be used in restocking if clearfelling is carried out. These decisions have a major impact on timber supply, carbon balance and on the provision of public goods.
- ***Management of the Resource, pages 19 to 2: National Annual Allowable Cut*** – This document correctly draws attention to the need for the calculation and publication of a national Annual Allowable Cut (AAC). It also correctly focuses on the need for standardised Forest Management Plans as well as a continuing cycle of the National Forest Inventory and on-going updating of timber forecasts – all of which are necessary for the calculation of a national AAC. However, these should be mentioned in the Strategic Actions in this Section. We also recommend that this report should give increased attention to current thinning and felling practices in private and public forests and to the quality of reforestation. The increasing role of second or third rotation forests requires that reforestation practices are sustainable and that they ensure these forests yield the maximum timber and non-timber benefits.
- ***Section 10, Cost Appraisal and Funding, page 51, para 3:*** – “Currently the carbon benefits from Kyoto compliant forests accrue to the State and form part of the national emission reduction compliance regime.” This paragraph would benefit from some further elaboration to clarify whether or not the (non State) funding of such afforestation will prevent such benefits accruing to the State.
- ***Section 11, Legislation:*** – We welcome all the Strategic Actions listed in this Section, particularly those relating to the requirement for a transparent and independent appeals procedure in the new Forestry Bill.
- ***Definition of the term “Forest Sector”*** – The term “Forest Sector” should be defined in order to create a greater awareness of the broad scope of policy that this document is intended to influence. Including such a definition may also help to influence the composition of the proposed Forest Council.

Finally, the Society of Irish Foresters is available to discuss, with the Forest Policy Review Group, these and any other issues which will help to ensure the sustainable management and development of our forestry and forest products industry.

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The Society of Irish Foresters
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