

Society of Irish Foresters

Submission to

COFORD Council Land Availability Working Group

Section A - *the main factors affecting the availability of land for afforestation*

The Society of Irish Foresters has identified two main factors here:-

- 1. Environmental constraints**
- 2. Unenclosed land constraints.**

To attain Government targets of 17% forest cover by the year 2030, a planting programme in excess of 23,000 ha per annum is required from 2012 to 2030 (457,000 ha in total). The Republic of Ireland has 6.9 million ha, of which 5.1 million ha (comprising 4.7 million ha of *utilisable agricultural land* and 0.4 million ha of *land having limited agricultural usage*) are deemed suitable for forestry development. Of this 5.1 million ha, 1.4 million ha are designated as environmentally sensitive.

1. Environmental constraints

Environmental issues relating to forestry are complex and the temptation to sterilise large tracts of land may be attractive in order to ensure compliance with EU regulations. The aim should be to manage all the natural resources of the island in a sustainable manner in the best interests of society.

The potential of a change of land use and associated site disturbance to detrimentally influence water quality is related to the buffering capacity (or associated concepts such as acid neutralising capacity, or critical load) of the soil, the ability of the soil to resist acidification. Essentially, thin acid soils are most sensitive in this regard, those derived from limestone are least sensitive. All crop production contributes to the acceleration of the natural process of soil acidification (hence the necessity for liming of agricultural soils). However, the principal means by which forests may increase the rate of acidification is through the interception of airborne pollutants (so-called 'acid rain'). Information is emerging to suggest that climate change may be leading to increased acidification of surface waters in upland areas, but this is quite independent of any forest influence.

The risk from afforestation, or indeed any land-use change, of a potentially sensitive site depends upon the level of atmospheric deposition in the region and the acid sensitivity of the soil. The dramatic improvement in air quality in Europe over the past 30 years has resulted in a decrease in the deposition of pollutants in throughfall (i.e. beneath the forest canopy) in Ireland. While interception of sea-salts following major storms can result in stream acidification, these incidents are both infrequent and short-term in nature, involving no additional acidification of the soil.

The potential risk of land-use change should be assessed on a catchment basis as it is related to the proportion of the catchment subjected to change and to the sensitivity of the catchment as a whole. It stands to reason that disturbance of 100% of a sensitive catchment might well prove detrimental, whereas a change to 5% of the catchment is unlikely to have any effect. The sensitivity of a catchment cannot be accurately assessed by a broad-brush approach, using a small-scale soil or geological maps, as

variations in rock formations within a catchment may significantly influence sensitivity.

There is a need to take a multi-disciplinary approach to the question of the afforestation of acid sensitive catchments, taking into account air quality and soil sensitivity on a catchment basis in order to optimise the management of our resources.

2. Unenclosed land constraints

Unenclosed land broadly comprises all land which is not improved or enclosed by present or past cultivation and man made boundaries. It can vary from extremely poor, exposed sites to high producing forestry sites.

The wide range of sites that fall into the unenclosed category suggests that these sites need to be assessed on their merits on a site-by-site basis. Applicants should be free to make a case for afforestation based on factors such as site productivity, stability, etc.

- There is a likelihood that, by reducing land availability, of deviating even further from planting targets and perhaps never achieving critical mass forestry
- Limiting further the options for farmers to choose alternative land use is likely to disincentivise them further from submitting planting applications. This is particularly true where greater profits from farming will reduce the availability of enclosed land.
- The advantage of assembling manageable forest units which will be economically viable.
- Ignoring a resource of productive forest land, which can boost or maintain forest yield.
- Foregoing another source of Carbon sequestration. Low levels of new land entering forestry will adversely impact on the future pattern of carbon storage as the higher plantings of the 1990s fall due for felling, thus reducing the areas storing carbon and also releasing significant amounts of carbon immediately and longer term.

Section B – the main constraints to achieving afforestation goals

- Uncertainty – regarding the duration/term of Premium payments.
- Uncertainty – taxation of profits of long-term commercial forestry operations
- Rigid application/enforcement of replanting obligations
- The current 20% ceiling on Unenclosed land

Section C – what incentives would support the achievement of these goals

- Introduce a *site by site* assessment of all planting applications
- Remove the current ceiling on Unenclosed land
- Reduce uncertainty by guaranteeing premiums once a site has been planted
- Increased flexibility in application of replanting obligation
- Uniform interpretation of planting regulations by Forest Service

Recommendations

- Directives which severely constrain the planting of unenclosed land should be withdrawn pending more widespread consultation with the industry.
- All planting applications must be assessed on a site-by-site basis.

- A return to reasoned arguments on the value of flexibility achieved by farmers in including unenclosed land when assembling parcels for planting applications.
- The compilation of preliminary data on productivity on unenclosed land.
- Forests do not grow on two or five year cycles, thus forest research programs based on short term projects or programmes, should be re-evaluated.

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