



Society of Irish Foresters

## Submission from the Society of Irish Foresters to the Department of Agriculture, Food and the Marine (DAFM) on Statement of Strategy 2021 – 2024

This submission is made on behalf of the Society of Irish Forester which represents 760 members comprising professional foresters, third level forestry students and associate members working in forest management and related sectors including ecology, timber processing, research and academia.

The Society of Irish Foresters welcomes the opportunity to make this submission to the DAFM with regard to the preparation of the new Statement of Strategy 2021 – 2024. We have consulted widely with our members and a common theme has emerged throughout this dialogue:

*The performance of the current forestry programme 2014-2020 has fallen to an unacceptably low level which is reflected in the dramatic decline of afforestation and underperforming wood mobilisation. The existing structure will require a major overhaul if a viable forestry programme is to be achieved from 2021 to 2024.*

The afforestation programme has been in decline for a number of years and is now at its lowest since 1948 while wood mobilisation – due to the dearth of licence approvals – has fallen dramatically, especially since October 2019. The enactment of the Forestry (Miscellaneous Provisions) Act 2020 should help the Forestry Appeals Committee to deal effectively with appeals, but approval of licence applications for planting, roading and felling by the Department remains acute.

Increasing performance will require a partnership approach between the State and relevant stakeholders to achieve a 8,000ha afforestation programme, to optimise wood and non-wood benefits that not only benefit the forestry and forest products sector but society at large which is the core value of sustainable forest management and the Society of Irish Forester's mission.

### **KEY ACTIONS REQUIRED FOR FORESTRY**

We believe that the decline in the forestry programme can be arrested if the following key actions take place:

- Implement the Mackinnon Review
- Appoint a project manager to ensure Mackinnon Review is implemented.
- Implement the COFORD *Land Availability for Afforestation* report.
- Establish a Forestry Development Agency.
- Address research needs.

### **Implementation of Mackinnon review**

The "Review of Approval Processes for Afforestation in Ireland" by Jim Mackinnon, CBE (known as the Mackinnon review) launched in November 2019 has received widespread support among forestry stakeholders.

Forestry is the only land use that requires not only licence approval to plant but repeated licences to harvest and access the crop. This needs to be addressed as pointed out by Mackinnon who recommended a review of "the legislation on forestry [to] consider the introduction of a single consent covering planting, road construction, management and felling".

The recent enactment of the Forestry (Miscellaneous Provisions) Act 2020, recommended by Mackinnon and the recruitment of extra specialist staff including foresters and ecologists are welcome developments but there are 20 further actions that require implementation, including the following which the Society has highlighted:

- Raise the political profile and commitment to woodland creation including the recommendation to "Raise awareness of value of woodland creation and a vibrant forest industry".
- Develop a Customer Service Charter, which sets out the service relevant stakeholders should expect and receive.
- Prepare a Forestry Strategy for Ireland
- Focus action on reducing current backlog of applications – afforestation, felling and roading licences – as well as ensuring sufficient resources to the Forestry Appeals Committee.

- Introduce Pre-Application discussions. Mackinnon acknowledged that pre-application consultation is very much the exception because of perceived tensions between the Inspectorate's enabling and regulatory roles. To achieve this, Mackinnon believes that there is a "need for greater commitment by all to partnership working".
- New Requirement for Environment Report supported by Planning Grant.
- Develop guidance on the Habitats Directive as it affects licensing applications.
- Discuss with the European Commission the impact of the Directive and woodland creation to support the Climate Action Plan.
- Revise Memoranda of Understanding with the National Monument Service and the National Parks and Wildlife Service. Timescales for public body consultation should be aligned. To achieve this, Mackinnon also recommended that "all State Bodies play their part in implementing the forestry strategy".
- Introduce genuine Key Performance Indicators (KPI) to measure actual performance "such as time taken to conduct a screening, the number of applications which did not require requests to prepare a Natura Impact Statement, and how long a decision on a licence or appeal takes to issue".
- Establish an Irish Forestry Standard.
- Raise the status and profile of the Inspectorate including the appointment of a chief forester at assistant secretary level.
- Review education and training of forestry professionals. This is compatible with the Society of Irish Foresters' approach to education including its continued professional development (CPD) programme.
- Conduct pilot studies on land availability, including the potential for woodland creation on areas of unenclosed land.

Mackinnon's suggestions to increase the status of a forestry minister, the profile of the Department (including incorporating 'forestry' in the title) and putting a Chief Forester in place are welcome. Since the Mackinnon review was launched the opportunity to place 'forestry' in the Department title has not been carried out. For the first time in the history of the State forestry is not even mentioned in any minister's official portfolio. The current minister is officially designated "land use and biodiversity" but not "forestry".

#### **Appoint project manager to implement Mackinnon Review**

The implementation of the Mackinnon review features in the Programme for Government and is linked with achieving a viable annual afforestation programme now agreed as 8,000ha.

It is vital that the commitment to appoint an external project manager to oversee the implementation of the Mackinnon review is honoured. The Society would also support the retention of Mr. Mackinnon in a monitoring role based on his experience in influencing forestry in Scotland.

#### **Land availability**

The COFORD commissioned report *Land Availability for Afforestation* launched in 2016 identified an additional 500,000 ha of land as economically and environmentally suitable for forestry without negatively affecting agricultural production. The report outlined how the forest estate could be increased from 11% to 18% of the land area by mid century, which is broadly in line with two other Department strategy documents *Forests, Products and People* and *FoodWise 2025*.

Apart from low productivity agriculture and rough grassland not farmed, the report identified 179,000ha of unenclosed land with good potential for forestry. This land is effectively banned from afforestation due to the 20% rule. This permits only a maximum planting area of 20% unenclosed land in any one licence application. As a result there has been an artificially high concentration of planting in counties Roscommon, Leitrim, Sligo and Cavan where unenclosed land is not as big and issue as in Munster counties where the afforestation programme has collapsed especially in Cork, Kerry and Limerick. The removal of the 20% rule would restore a geographically balanced viable afforestation planting programme as well as reducing the opposition to forestry in the aforementioned counties.

#### **Forestry Development Agency (FDA)**

The Society supports the establishment of a forestry development agency (FDA) Forestry is the only natural resource without such a representative body. Examples of similar bodies that work well with their parent departments and sectors include ports and shipping (IMDO), food (Bord Bia), sea fisheries (BIM), inland fisheries (IFI), marine research (Marine Institute) and renewable energy (SEI).

The proposal for such a body was finally accepted in 2014 when it featured in the DAFM strategic plan for the forestry and forest products sector *Forests, products and people. Ireland's forest policy – a renewed vision*. This strategy included the following recommendation:

- To set up a Task Force to consider the establishment of a stand-alone government body or agency which could have the responsibility of addressing the developmental and promotional issues of the forest sector.

The Society welcomed this recommendation to set up a Task Force as its terms were close to the FDA proposal. We believe that the forestry and forest products sector would benefit enormously from the establishment of an independent FDA and that the DAFM and/or other Departments would also benefit from having the support of such a body at national and EU level.

### **Research needs**

SIF believes that an improved structure for the management of the national forest research programme will enhance its output and effectiveness. The Society is deeply concerned about the diminishing role of research in Irish forestry.

In contrast to the other natural resource industries of agriculture, food and fisheries and indeed to forestry in most of the developed countries, no permanent centre for forest research currently exists in Ireland.

The ability of Ireland to respond to environmental crises related to climate change and international disease spread or to capitalise on the material, financial and social benefits generated by forests, is compromised by the lack of a research centre.

At a time when climate change is predicted to have unprecedented impacts on forests and other land uses, there is a need to ensure that we have the capability and capacity to adapt to a changing environment. The recent National Forestry Conference emphasised that threats to forests are likely to increase and already we have seen the spread of insect pests and diseases beyond their previous ranges. This is particularly true of ash dieback and *Phytophthora ramorum* in larch while predicted shifts in moisture regimes and a greater frequency and severity of storms will pose a real threat to the health and productivity of the forest estate.

The Society proposed a Forest Research Centre which would address the following issues, raised by the forestry profession:

- The need for sound scientific input into advising on the programme;
- The necessity to maintain expertise in key disciplines;
- The ability to manage and secure long-term research projects and trials;
- The need to respond scientifically to unexpected protection and environmental issues; and
- The importance of communicating and transferring research findings into practice across the sector.

## **RESPONSE TO DAFM SPECIFIC QUESTIONS**

The Society's views on developing a viable forestry programme are outlined above. In addition, the following is our response to the questions posed in your letter of 2<sup>nd</sup> October 2020:

### **How could DAFM services to forestry be enhanced?**

Firstly, by adopting the Mackinnon review including proposals on a customer charter and raising the political profile of forestry. The Department on its own cannot do this but needs buy in from a diverse range of stakeholders and secondly, by the establishment of an independent forestry development agency (FDA) as forestry is the only natural resource without such an agency or board.

### **What forthcoming market and other challenges should the Department prioritise?**

Prioritise the implementation of the Mackinnon review, the appointment of a project manager or chairperson to oversee its implementation. Also implement the COFORD *Land Availability for Afforestation* report.

### **Are there opportunities (e.g. new developments or innovations) that the Department should consider when developing the 2021 - 2024 strategy which would advance the achievement of our mission, vision and objectives across the agri-food, forestry and marine sectors?**

Make it easy for landowners to buy into forestry by simplifying the application and licencing process while ensuring sustainable forest management.

Treat the forestry programme as an equal partnership between the State and the private sector.

### **What metrics should the Department use to measure our performance and monitor achievement of our strategic goals?**

The State's commitment to an 8,000ha annual afforestation programme should be interpreted as a target rather than an aspiration. The Society believes that "what gets measured gets done". Therefore the forestry programme needs to be matched by achievable targets set for the relevant stakeholders including, foresters and forestry companies, Forest Service inspectorate and landowners – mainly farmers – in consultation with other relevant stakeholders.

There is a need to restore the identity and purpose of forestry by placing 'forestry' in the Department title and in the minister's portfolio title. It is essential also that the sector has an independent forestry development agency to bring forestry in line with all other natural resources such as food, fisheries, marine and energy.

The Society would welcome the opportunity to engage with the Department to discuss this submission in greater detail.

Pat O'Sullivan  
Technical Director  
Society of Irish Forester  
16<sup>th</sup> October 2020