



COILLEARNACHA DÚCHASA NA HÉIREANN
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Committee Clerk of the Joint Oireachtas Committee on Agriculture and the Marine

Your Ref: AFM-i-019-2020

Tuesday 3rd November 2020

Dear Clerk, thank you for your invitation to a meeting of the Joint Committee on Agriculture and the Marine.

Woodlands of Ireland is a not-for-profit charity dedicated to native woodlands. It is an inclusive organisation whose primary objectives are:

- to generate awareness of native woodlands amongst policy makers and the general public
- to develop projects and sustainable management strategies aimed at ensuring the future viability of native woodlands

Our CEO, Joe Gowran MSc. BLUP, will be attending the meeting.

He has a background in practical woodland management focussed on semi-natural woodland, creating new native woodland and the conservation of related habitats such as hedges and scrub. His early training began in Leitrim with Crann/FÁS in 1987, followed by 11 years with Ashling Woodland Development Co-operative Society Ltd /AWD Ltd, doing a mix of Broadleaf afforestation, Woodland Improvement in the private sector and contract work for Coillte Teo. and NPWS. He has been involved with Woodlands of Ireland in various capacities since its inception in 1998 and carried out several of the earliest contracts in both the Native Woodland Conservation and Afforestation Schemes from 2001.

Please see our submission to the Committee below.

Is mise le meas

A handwritten signature in black ink, appearing to be 'Joe Gowran', written in a cursive style.

Joint Oireachtas Committee on Agriculture and the Marine meeting submission

Your Ref: AFM-i-019-2020

I thank the Chairman and members for inviting Woodlands of Ireland to address the Committee today. The following submission forms the basis of our 10 minute opening statement.

1. AA/NIS/ Appeals backlog Key points:

Many site applications that are wholly for Native Woodland Scheme (NWS) Afforestation or that contain significant sub compartments with Native Woodland Grant Premium Category plots within them, are being delayed by a very thorough rate of appeals.

We have asked DAFM , could codes be applied, to indicate the percentage of NWS GPCs in each application?

The factors that have compounded the Appeals situation are linked to genuine efforts by various government departments and agencies, including DAFM, to significantly improve compliance with the Water Framework Directive (WFD). Hence the need for Appropriate Assessment Screening and Natura Impact Statements for a range of sites, where previously the cycle of forestry activity and practises such as clear felling and pesticide use in re-afforestation, had pre-dated the state's now focussed implementation of the WFD and the Habitats and Birds Directive.

2. Background context: 'The [Water Framework Directive](#) requires all European surface water – lakes, rivers, transitional and coastal water, and groundwater – to reach “good status” by 2015’. **‘The maximum deadline possible is 2027.’**

‘The [Floods Directive](#) requires Member States to identify and map areas at risk of flooding, and to make plans to manage and reduce those flood risks.’

Recent EU Court rulings (as referred to in answer to Dáil Debate Question 475 by DAFM Minister Creed on 19/11/2019) reinforce the realisation that forestry plans or proposals cannot have any negative impact on sites or species protected under the Habitats or Birds Directives.

The Appropriate Assessment/ Natura Impact Statement/ Environmental Impact /Appeals backlog situation is greatly exacerbated by that realization.

Creating new native woodland, conserving existing semi-natural woodland, hedges, promoting emerging woodland and scrub may provide some of the resolution to the situation, in the context of zoning for **Protective Forest in catchments**. See detail below.

Most conifer stands are designed to be clear-felled or can be too unstable to thin, because of soil type and shallow rooting. Rotation lengths have in some cases reduced to as low as 27 years.

Clear-felling often creates conditions for surges in pine weevil populations, which in turn present a ring barking threat to restocked plants. In most cases, plants are treated with pesticide and may later have top up spray treatments on site.

Each individual harvesting and reforestation plan detailed in a felling license application requires an assessment by Forest Service who in turn may need to consult with Local Authorities, National Parks and Wildlife Service, Inland Fisheries Ireland and An Taisce.

Frequently asked questions: Can siltation be avoided? What form does a new or improved water setback take? Is there run off or leaching of fertiliser or pesticides into water courses?

Does the plan meet the 15% broadleaf restock requirement of DAFM?

Is their sufficient enforcement of license terms following on- site inspections?

Approved plans, then go to public consultations and frequently appeals.

3. **Protective Forest Zoning: may be part of the solution**

Upland forestry sites will invariably drain into river catchments and consequently should be regarded as potential components of a network of 'Protective Forests' within catchments. (Motta et al 2000)

In an island of Ireland context the function of a protective forest could be:

- Protection of drinking water sources
- Protection of Natura 2000 habitats and species
- Protection of Fisheries
- Reducing the risk of flooding and landslide
- Maintaining woodland habitats for conserving Biological Diversity

The concept of Protective Forest links in with the objectives of the National Technical Implementation Group* (NTIG) of the River Basin Management Plan (RBMP) 2018-2021. Much of this is outlined in the Woodland for Water: Creating new native woodlands to protect and enhance Ireland's waters (DAFM 2018) and the Forests & Water document (DAFM, 2018) 'to provide the basis for identifying key locations where new native woodland will contribute most to protecting and enhancing water, and for engaging with farmers and other landowners to undertake such planting.'

Through our Technical Advisory Panel we are looking at developing the criteria for a research project on mapping potential protective forest zones in catchments.

Ash dieback: 2 key points

- 1) Attempt to save the species from extinction

A reference was made in last weeks' Committee discussion to Elm having become extinct and Ash going the same way. Elm, although a shadow of its' former self, survives in semi-natural woodland and in hedges in a range of localities around the island.

In the 5% survival scenario for Ash, it is likely to remain present in mixed species woodland, scrub and hedges. Natural regeneration of Ash and Elm needs to be encouraged to keep these species alive. This can be done in the context of Native Woodland Scheme Conservation measure, Woodland Improvement measures / Neighbourwood, Continuous Cover Forestry Schemes and Agri-environment measures.

- 2) Consider supporting those who were under contract with the Dept. to plant single species/ few species Ash stands, to convert them to multi-species stands of indigenous genetic stock of native species including Scots pine, using an amended version of the underutilised Native Woodland Scheme Conservation Measure. (less than 200ha of funding has been allocated for a scheme with a 1,950 hectare target for the 2014-2020 period)

Treatment option: In the dormant season, stump back diseased trees as they occur, remove logs down to 5cm diameter for craft or fuel and then burn the remaining lighter branches and leaf litter the following September onwards (to avoid bird and mammal nesting season).

References:

https://ec.europa.eu/info/news/implementation-report-water-framework-directive-and-floods-directive-questions-and-answers-2019-feb-26_en

<https://www.trees.org.uk/Trees.org.uk/media/Trees.org.uk/Documents/eBooks/AshDieback-GuidanceNote-web.pdf>

**3.4.1 National Technical Implementation Group (NTIG) This group oversees the technical implementation of the RBMP at a national level and provides a forum to ensure co-ordinated actions amongst all relevant State actors and to address operational barriers to implementation that may arise. The group is chaired by the EPA, and membership includes Local Authorities, OPW, Inland Fisheries Ireland, Teagasc, DAFM, Irish Water, DHPLG, Coillte, NPWS and other implementing bodies, as appropriate. It reviews progress on an ongoing basis and provides updates to the National Co-ordination & Management Committee (NCCM) on the implementation and effectiveness of measures. The NTIG is also a forum for information exchange and to promote the consistency of regional implementation. The EPA, who is statutorily responsible for reporting on the WFD, will coordinate ongoing tracking of the implementation of actions and will, in conjunction with others, undertake assessment of their effectiveness via the monitoring programme.*

Forests & Water Achieving Objectives under Ireland's River Basin Management Plan 2018-2021 DAFM 2018

https://www.researchgate.net/publication/232679646_Protective_Forests_and_Silvicultural_Stability (Motta et al 2000) - an example of long term Protective Forest from Switzerland that gives useful definitions about their form and function.

Woodland for Water: Creating new native woodlands to protect and enhance Ireland's waters
DAFM 2018

<https://www.catchments.ie/significant-pressures-forestry/>

EPA Research - HYDROFOR: Assessment of the Impacts of Forest Operations on the
Ecological Quality of

Water: <https://www.epa.ie/pubs/reports/research/water/researchreport169.html>

River Basin Management Plan

<https://www.housing.gov.ie/water/water-quality/river-basin-management-plans/river-basin-management-plan-2018-2021>

The next River Basin Management Plan for 2022-2027 is currently being developed; a public consultation on the Significant Water Management issues in Ireland was open at present; <https://www.catchments.ie/public-consultation-significant-water-management-issues-for-irelands-2022-2027-river-basin-management-plan/>