

CONSULTATION

Response Document



**Working Towards Ireland's Shared Vision for Forestry and a
New Forest Strategy**

(Department of Agriculture, Food and the Marine)

26 April 2022

Introduction to CIEEM

The Chartered Institute of Ecology and Environmental Management (CIEEM), as the leading membership organisation supporting professional ecologists and environmental managers in the United Kingdom and Ireland, welcomes the opportunity to comment on this consultation.

CIEEM was established in 1991 and has over 6,000 members drawn from local authorities, government agencies, industry, environmental consultancy, teaching/research, and voluntary environmental organisations. The Chartered Institute has led the way in defining and raising the standards of ecological and environmental management practice with regard to biodiversity protection and enhancement. It promotes knowledge sharing through events and publications, skills development through its comprehensive training and development programme and best practice through the dissemination of technical guidance for the profession and related disciplines.

CIEEM is a member of:

- Northern Ireland Environment Link
- Scottish Environment Link
- Wales Environment Link
- Environmental Policy Forum
- IUCN – The World Conservation Union
- Professional Associations Research Network
- Society for the Environment
- United Nations Decade on Biodiversity 2011-2020 Network
- Greener UK
- Irish Forum on Natural Capital (working group member)
- National Biodiversity Forum (Ireland)
- The Environmental Science Association of Ireland

CIEEM has approximately 260 members in Ireland who are drawn from across the private consultancy sector, NGOs, government and semi-state agencies, local authorities, academia and industry. They are practising ecologists and environmental managers, many of whom regularly provide input to and advice on land management for the benefit of protected species and biodiversity in general.

This response was coordinated by our Ireland Policy Group.

We welcome the opportunity to participate in this consultation and would be happy to provide further information on this topic. Please contact Jason Reeves (CIEEM Head of Policy and Communications) at JasonReeves@cieem.net with any queries.

General Comments

The wording of many of the tick-box statements is concerning as they are leading questions and some provide no opportunity to expand on the selection made. Many of these issues cannot be resolved in a blanket statement and must be assessed on a case-by-case basis, for example, whether a site is suitable for planting, should be managed for biodiversity or wood production, or should be restored to a different habitat.

Consultation Question Responses

Do you agree with the following statement?

“Ireland needs more forests” *

Strongly agree

Ireland needs more forests because....

The consultation recognises that forests provide essential ecosystem services, including habitat for biodiversity, water cycle regulation, carbon removal, and cultural services such as positive impacts on wellbeing. However, Ireland still has the second lowest percentage forest land cover in Europe¹.

There is a clear need to restore native forests across Ireland in a strategic way to allow maximum benefits to society and nature, and minimal harm to existing biodiversity.

We would like to clarify that Ireland doesn't just need more forests, it needs more native mixed-species forests with a primary purpose of supporting biodiversity and ecosystem services including carbon sequestration.

Management of Ireland's forests should promote Continuous Cover Forestry to increase diversity in existing forests and promote multi-purpose use.

The right reasons

When you think of forests and the creation of new forests in Ireland how important are the following reasons for you ?

Forests for tackling Climate Change e.g. Absorbing and storing carbon, protecting against flooding - Very important

Forests for Nature e.g. supporting the diversity of plants, animals and habitats protecting the environment and biodiversity - Very important

Forests for Wood e.g. ensuring a consistent supply of timber products to build houses and for building a green and circular economy. - Important

Forests for People e.g. providing spaces for health, wellbeing and recreation - Important

Forests for economic and rural development, providing income for forest owners, forest workers and rural communities - Important

Forests for improving the visual impact on the landscape - Important

¹ <https://ec.europa.eu/eurostat/web/products-eurostat-news/-/edn-20210321-1>

Nature-based Solutions, including forest creation and restoration will be crucial in reaching global climate targets. A study of global carbon sequestration and storage potential, published in the *Proceedings of the National Academy of Sciences*, found that “natural climate solutions can provide over one-third of the cost-effective climate mitigation needed between now and 2030 to stabilise warming to below 2 °C.”²

Carbon storage needs should also be balanced with other objectives, for example, protection and restoration of biodiversity. Conifers can sequester and store more carbon in the short to medium term due to their fast-growing nature. However, evidence suggests that in the long-term, oak species store an equal or greater amount of carbon³ and can provide additional benefits for biodiversity. When planting woodland, a full assessment of the carbon losses and gains over time must be made, alongside assessments of ecological impacts. New woodlands may take 30 years or more to become a significant carbon sink, depending on the soil type and level of disturbance during establishment, what habitat they are replacing and the tree species used. Assessments of losses and gains will determine whether woodlands are the best option and whether they should be planted or could be generated through natural colonisation, which can deliver a more immediate carbon sink.

Management and long-term maintenance is very important in this context as it will impact the ability of a forest to deliver these, regardless of composition.

We would like to see encouragement of broadleaf timber production rather than purely conifer timber production.

Forests for tackling Climate Change and enhancing Biodiversity

Do you agree or disagree with the following statements?

Ireland needs to create more forest to contribute to reducing carbon dioxide and achieving carbon neutrality by 2050. - Agree

Ireland needs to create more forest to protect and improve biodiversity. - Strongly agree

Both climate change and biodiversity improvements should be targeted when planning and managing forests. - Strongly agree

The role of forests to benefit biodiversity is equally important than their role to store carbon - Strongly agree

Restoring and enhancing our native woodland habitats is important for biodiversity. - Strongly agree

Forest habitats should be allowed to generate naturally, where appropriate. - Strongly agree

Strategic planning of climate measures, including forest expansion is hugely important to avoid negative impacts on biodiversity, and counter-productive measures such as planting on peat soils. Damage to peatlands, including peat extraction and drainage, results in a net increase of carbon from the soils. Full restoration may take decades, so long-term, well-resourced projects are vital to restore peatlands and their hydrology to safeguard our peatlands and provide for new carbon sequestration and storage. Restored peatland can prevent the loss of and capture up to 21.3t.CO₂/ha/yr: the highest measurement achieved of any habitat.

² Griscom B.W. *et al.* (2017) Natural climate solutions, *PNAS*, 114(44), 11645-11650.

<https://doi.org/10.1073/pnas.1710465114>

³ Natural England (2012) Carbon storage by habitat: Review of the evidence of the impacts of management decisions and condition of carbon stores and sources (NERR043)

As mentioned under the previous question, forests will be important in achieving climate goals, however, expansion of forests should not be used to offset the need to cut greenhouse gas emissions from high-carbon sectors.

Forests for wood

Do you agree or disagree with the following statements?

It is important that we use a higher percentage of wood products in the construction of Irish homes. - Agree

It is important that we use local Irish grown timber for building homes in Ireland. - Agree

To meet the demand of wood use in construction, Ireland should plant, grow and harvest sufficient numbers of fast-growing conifer trees. - Disagree

The final statement on “sufficient numbers of fast-growing conifer trees” is difficult to comment on without further information. For example, how much is sufficient? What is the current deficit given the current cover of conifers in Ireland? Conifers do have a place in meeting construction needs but this should not come at the expense of biodiversity. A step-change towards multi-species stands and Continuous Cover Forestry can provide for both biodiversity and construction needs, but again this must be assessed on a site-by-site basis.

Forests for People

When considering the possible establishment of new forests in your community, do you agree or disagree with the following statements?

It is important that we facilitate public access to forests where possible. - Agree

Public access should be limited to publicly owned forests. - Disagree

Privately owned forests should also facilitate public access. - Neither agree or disagree

It is important that forests provide opportunities for outdoor recreation. - Agree

It is important that forests provide opportunities for outdoor learning, training and education (outdoor classrooms). - Agree

It is important that forests provide opportunities for local employment in forestry. - Agree

It is well established that access to nature, particularly forests, is important for positive health and wellbeing. In addition, engaging with nature can lead to increased valuing and protection of the natural environment, and more demand for high quality forests. However, recreational use needs to be carefully balanced with biodiversity management to avoid negative impacts. There is a need to assess such impacts on a case by case basis for all activities that may take place. Impacts must be monitored and evaluated over time to allow for adaptive management.

Privately-owned forests should be encouraged to provide public access wherever possible.

The right trees

When thinking about the future mix of forestry in Ireland, do you agree or disagree with the following statements?

The current mix of trees is about right. - Strongly disagree

Ireland needs more native and broadleaf trees to get the benefits flowing from native trees and hardwoods. - Strongly agree

Ireland needs more non-native and conifer trees to get the benefits flowing from softwoods. - Strongly disagree

Ireland needs more diverse forests (a combination of both conifer and broadleaf trees). - Strongly agree

We need to plant more trees and quickly regardless of the type of tree. - Strongly disagree

It is important to make the distinction here that broadleaf trees can also be non-native and invasive (for example Beech and Sycamore), and vice versa for conifers. Where possible, planting schemes should be using native species of local provenance.

The right management

Do you agree or disagree with the following statements?

Forests in environmentally sensitive areas such as peatlands should be managed and maintained in a way that they can have a net benefit to the environment and climate change. - we will not be answering this question as it will vary on a case-by-case basis. Forests in general should be managed this way (although it will not always be possible), but fundamentally we should not be planting on peatlands. What the “net benefit” is would also need to be quantified.

Although some past planting has resulted in damage to Ireland’s environment, forests should now remain in areas where they are already planted but using the principles of sustainable forest management and with greater levels of species diversification. - Strongly disagree

These environmentally sensitive areas should not be re-planted after harvesting and the original habitat should be restored. - Strongly agree

In addition to the above comment, we would like to raise another important issue regarding forestry practices on environmentally sensitive habitats; stronger regulation of aerial fertilisation in forestry.

Large areas of forestry are often fertilised from the air using light aircraft. If applied irresponsibly, this can cause fertiliser to drift outside the boundaries of the forestry onto adjacent non-forested habitats. This can have an impact on habitats that are naturally low in nutrients (notably peatlands and heathlands), as fertiliser can significantly alter the structure of the vegetation, leading to overgrowth of grasses and heather, and inhibiting the growth of peat-forming species such as Sphagnum mosses and cotton grasses. Therefore, measures should be taken to reduce the effects of fertiliser drift on adjacent non-forested habitat, for example, by preventing application within 100 m of the site boundary, ensuring applications take place in zero-wind conditions, or applying fertiliser by other means.

Urban trees and forests

Trees and urban forests should be included as part of the design of any future urban and near to urban planning developments, particularly housing projects. - Agree

Future tree planting and forest establishment should only be concentrated in rural areas. - Disagree

Any strategies for trees and forests in urban and near urban areas should be planned for and developed at a local level with appropriate stakeholder engagement (e.g. by local authorities as part of land-use planning and management). - Agree

While we generally agree with the first statement, it will not always be appropriate and would depend on the environmental impact assessment.

The right management section 2

Do you think there would be greater acceptance of the use of non-native conifers in Ireland if a system like Continuous Cover Forestry was used more widely?

Yes

Which of the following actions do you think could develop a greater willingness to accept the planting of non-native conifer trees in Ireland?

Diversify the species mix

We would also support option 1 "Providing information and incentives to forest owners on alternatives to even aged management and clearfelling" and emphasise the importance of promoting Continuous Cover Forestry. Non-native conifers should always be a minority in planting despite measures to increase willingness.

Obligation to replant

What do you think, if any, is the greatest risk associated with this obligation to replant? Please select one option.

This obligation should be removed as there is a greater risk to the creation of new forests

Currently, there are too many forests planted on peatlands, causing a net loss of carbon due to damage, and preventing the restoration of a crucial carbon store. This will remain an issue if these are not removed.

Supporting farmers

Provide guidance and case studies on the benefits of planting trees to diversify the farming enterprise and business model. - Important

Better alignment between agriculture and forestry incentives - Important

Making it easier for landowners to plant forests through a streamlined regulatory process. - Important

Provide education and training for farmers interested in planting trees. - Important

Payment for delivery of ecosystem services that provide a regular income for the public goods provided (e.g. clean water, nature, carbon). - Very Important

Increased incentives for the establishment of agroforestry systems on farms. - Important

We support streamlining of the regulatory process in some cases where it is unnecessarily complex to plant, however the process must ensure high environmental standards are retained and should not remove the need for environmental assessments to be carried out.

Deer management

Do you agree or disagree that managing deer, including culling, is an essential part of forest management in Ireland, where deer populations are impacting negatively on forests?

Strongly agree

How effective do you think the actions below would be in reducing damage to diverse and native forests caused by deer?

Develop a national or all Island policy on sustainable deer management and control measures. - Very effective

Develop a domestic market with a quality assurance scheme for venison in Ireland. - Effective

A new strategy for professional and recreational deer hunting. - Neutral

Creation of a single authority with responsibility for a deer records database and implementing deer management policy. - Effective

We have selected “neutral” on the strategy for professional and recreational deer hunting as there are several difficulties in regulating hunting, and professional and recreational practices will be very different.

Vision

Considering how you answered the questions throughout this survey, what aspects of this vision statement, if any, would you change?

The title of the vision statement is highly subjective - what is “the right reason” for one will be the wrong reason for another. A clear statement with significantly less ambiguity is needed, including what is included in the standard of a “healthy environment”. The vision statement for 2050 should be ambitious in terms of goals for biodiversity, climate and society, and we welcome the former two issues being listed as a high priority in the draft vision.

We would like to see a clear statement that “Monocultures and clear-felling are no longer standard practice” with forests instead managed to increase and maintain high biodiversity, and provide multiple benefits.

The forestry strategy must include specific, measurable and time bound targets for achieving the vision, and set out what resources will be provided to achieve them.

We would like to see the statement “building on improvements in management evident under the 2014-2020 Forestry Programme” expanded and strengthened. Specifically what improvements from the programme are being referred to, and a stronger, more measurable commitment than just “building on” these.

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