

Doolough Protection Group

.....seeking the conservation of our environment and the future of our community.

Remarks on FSC certification of Coillte



Picture: Doolough Lake, by Mike Mulcaire ©January 2004

Prepared by: the Doolough Protection Group

June 2004

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I. Focus of the Doolough Protection Group: the south Doolough Lake area in west Clare

The Doolough Protection Group is an environmental group based in west Clare. It was formed in early 2002 by twenty volunteers residing in the area. The area of focus to the Group is the southern part of the Slieve Callan/Mount Callan uplands, between the villages of Lissycasey, Kilmaley, Mullagh and Kilmihil. We also refer to it as the "south Doolough area."

The south Doolough area is isolated, relatively undisturbed and is a refuge for wildlife. Under high pressure from conifer afforestation, the last remnants of a large system of boglands, lakes and streams are vital for our biodiversity, landscapes and environment. Doolough Lake is the largest lake in the County and the source of drinking water for most of west Clare. The shorelines of the minor lakes such as Lough Nacrag, Lough Namina and Lough Acrow support intact habitats and important species. Habitats listed in Annex I of the EU Habitats Directive present throughout our area include active blanket bog, wet heath and dry heath, while birds listed in Annex I of the EU Birds Directive include Hen Harriers, Whooper Swans, Merlins and Golden Plovers.

We identify the biggest threats to our environment and community as commercial afforestation, poor land management practices, rural "one-off housing" and the recent rush toward wind energy development. Until now, the Group has concentrated on opposing a number of proposed windfarm applications, and afforestation in areas classified as environmentally sensitive. The reason for this has been a sense of urgency, due to the high periodicity of new developments related to the planning process for wind energy projects, and the known environmental and social impacts of non-native conifer afforestation and industrial wind production in an environmentally sensitive area such as ours. We aim to balance this situation with a number of pro-active, more positive actions, including species and habitats surveys and local environmental awareness actions. In March 2004, we submitted a detailed document compiling data and data sources on the biodiversity of south Doolough to the Local Biodiversity Action Plan project manager, Elaine Keegan, Clare County Council.

II. Context: forestry in the south Doolough area

Forestry is a dominant agricultural activity locally, along with beef production. Forestry tends to supplant traditional agriculture to a larger extent every year with farmers retiring or putting part or all of their land under afforestation. The principal species planted is Sitka spruce, giving an overall dark, monotonous and degraded aspect of the area, with plantations marred by the straight lines of forestry drains.

A rough visual survey of our area shows that Sitka spruce is still widely planted in monoculture, except for a narrow band of broadleaves or mixed species (1 to 3 rows) on the roadside margins. In the rare "diverse" parcels established recently, Larch and Lodgepole Pine are used in conjunction with Sitka spruce. Virtually no substantial area is planted with broadleaf species, though such species as Ash, Alder and Sycamore do appear to grow quite well, as evidenced by the apparently higher growth rate of broadleaves in the margins, at least during the first decade post-plantation.

EU support for forestry aims in particular at reducing land under agricultural production. This purpose is perverted in marginal areas such as ours. Whenever green, flat fields (mostly situated at the boundaries of the Slieve Callan uplands) are being planted, local farmers are known to express their dismay at "good" land being wasted. Conversely, public opinion of forestry outside our area appears very un-informed of the situation in marginal lands. At the recent annual Burren Law School at the Burren College of Art in Ballyvaughan, Co. Clare, Conor Skehan of the Dublin Institute of Technology gave his prognostic on future changes in land-use in the countryside. He said: "very extensive areas will cease to be farmed: the more productive lowland soils will be used for forestry and the rest will naturally return to woodland cover." [*The changing countryside, The Clare Champion 7 May 2004.*] Actually the reverse is true in our area: the less productive upland areas are destroyed by conifer plantations while the more productive lowland soils remain in agriculture.

The other stated EU aim which is to increase carbon storage in forests as part of the Kyoto commitments to combat climate change is also perverted, as active blanket bogs continue to be planted. Planting peat sites is counter-productive, as blanket bogs constitute large stores of carbon, which actively pump atmospheric carbon on a yearly basis and are now thought to be more efficient in this role than temperate forests. Drainage and mounding, which is the sole practice used locally, results in huge losses of carbon from the ecosystem through soil erosion at the initial stages, while deep drains contribute to the drying of peat which can then be oxidised and release its carbon to the atmosphere. Even the local Forest Service admits to the carbon balance in favour of afforestation of bogs being neutral, which is probably a euphemism.

The sustainable development agency of our area, the Ibrickane Network, recognises that bogland is the preferred target of foresters, but minimises the extent of this phenomenon by limiting it to "cut-away bogs". They write: "Today...much of the cut-away bog has been replanted as Sitka spruce forestry. Though not a labour intensive activity, it does bring substantial revenue to the area in the form of afforestation grants." [*Sustainable Development in Ibrickane - Building for the Future. Strategic Plan 2003-2006 prepared for the Ibrickane Network*]. There are numerous examples throughout our area where new parcels of intact blanket bog are being planted every year. The only bogs appearing to be protected from being planted are those regularly used for peat extraction for domestic fires. These are areas with good quality peat, good access for machinery and suitable lay-out for peat drying.

This overall context of the forestry situation in our area is intended to give the Soil Association a picture of a general situation. It is difficult to pinpoint what is the role of Coillte in the ongoing degradation of our area by forestry, but we can assure you that in the few cases where the ownership of the parcel is known, very little differences can be observed between the practices of Coillte and private operators, and in particular very little regard seems to be afforded locally to the fact that land is blanket bog or another priority habitat under the EU Habitats Directive, such as Wet Heath, Dry Heath, or wet grasslands.

For the preparation of this document, we aimed to compute the total fraction of our area under afforestation, the fraction of species used, the fraction of blanket bog and other priority habitat planted, the amount under control by Coillte versus private landowners, and a breakdown by period (with a particular interest in the post-FSC certification period for Coillte). Earlier this week, we telephoned John Flaherty, Forest Service Inspector in Ennis, to try to obtain more precise statistics on the extent and character of the land under afforestation in our area (percentage per townland, for instance). Even though we had been promised on a previous occasion to provide us with such statistics, he refused at this occasion to provide us with any information and repeatedly asked us what we needed this information for, probably in anticipation of the upcoming Soil Association conference in Derrybrien. We did not get any help either from the Forest Service in Johnstown Castle Estate, Wexford.

Thus, concerning the extent of recent Coillte operations in our area, the only information we have at this stage are qualitative. It is a fact that in recent years, particularly post-Coillte certification, little new land has come to the ownership of Coillte as private foresters are buying up any land that comes on the market. In each locality, a couple of big agri-businessmen, based locally or not, can afford to invest in buying marginal land which has nevertheless become relatively expensive. These names are also incidentally becoming involved in wind farming (see below). It is also known however that the smaller farmers who do not wish to turn into foresters but wish to retain ownership of the land can rent their land to Coillte as long-term leases. In these cases we believe that the land may not appear in records as being planted by Coillte and may not be subject to as much scrutiny. Bogland has been planted post-certification under this scheme, though this fact is disputed by the local Forest Service Inspector who claims that Farm Partnership schemes do not concern marginal land.

In this overall context, we are very skeptical about Coillte's project to restore active blanket bogs in Ireland (project funded by the EU DG-Environment under the EU LIFE-Nature Programme). Considering that huge amounts of blanket bog continue to be lost through afforestation in our area, and that Coillte most likely continues to play a role in this, such conservation projects restoring a few hectares are little more than a Public Relations exercise and an additional waste of EU funds. In County Clare only 16.2 acres of bog are to be restored in Pollagoona bog in east Clare according to the brochure on the project. Incidentally it is significant that such environmental projects take place in east Clare where public environmental awareness is much higher than in west Clare.

III. Case study: harvesting/replanting site at Doolough Lake

In this section we detail as a case study a recent Coillte harvesting/replanting site, located south of Doolough Lake (see map 1 at end of document).

This site is located in a zone theoretically afforded the highest protection on both water protection and visual protection grounds. A number of water protection designations govern it (River Catchment Zone, Water Protection Zone, County Ground Water Protection scheme, and Source Protection Plan for Doolough Lake). The immediate shorelines of Doolough Lake are classified as visually vulnerable in the Clare County Development Plan 1999 and remain as such in the draft County Development Plan 2004. The site is classified as sensitive by the Forest Service. Despite this fact, ourselves and a number of visitors were shocked by the damage done at harvesting stage and at replanting stage.

We approached the Forest Service Inspector in Ennis (Tom Kavannagh at this time), when harvesting was near completion. He proposed to use this as the site of a formal report on a harvesting site, which unfortunately did not happen as the site was mounded by the time of his inspection. He however visited us following his inspection and took time to listen to our concerns, which he confirmed to a large extent. These grievances were numerous:

- improper use of brash mats resulting in excessive area compacted by machine tracks.
- harvesting of all trees except for a narrow band of broadleaves at the roadside margin (see picture). This included scenic mature spruce trees along the forestry road entrance. Damage of some of the broadleaf trees at the margin by machines.
- damage to the road by harvesting trucks leading to huge pot-holes subsequently filled by County Council workers.
- considerable amount of branch debris left on site.
- considerable amount of soil disturbance and debris buried, which could lead to water pollution following organic matter decomposition

- very deep new drains opened in the direction of the slope rather than at right degree angle to minimise erosion and water flow
 - drains leading to a small roadside ditch and eventually directly to Doolough Lake, as the owner of the land opposite the road opened a new drain at the time of the operations, presumably to remove the excess water from his land.
 - repeat incidents of flooding of the public road during heavy rain events in the spring.
- etc.

We suggested to the Forest Service Inspector that, considering the environmental sensitivity of the site and the environmental and visual damage already done, some compensatory measures be applied subsequently. He dismissed outright the possibility of leaving the site unplanted or restoring it. He however offered to ask Coillte to discuss the species to be used, as part of the public consultation process (none of the neighbouring residents had been consulted at any stage of the harvesting). He entertained our hopes that the site be converted to a broadleaf plantation. These hopes were however dashed when the Coillte operator, Michael McNamara, did arrive to finally consult with us. By the time he visited us, the tree bags had already been delivered to the site and the species were only 20% diverse, which was the original species mix planned.

This example is indicative of a particular site which had a high potential to be used as a model site of good environmental practice and community relations, but this opportunity was largely lost and the site left instead as a model of the dismal practices of forestry operators in west Clare.

A month later, the adjoining site to the east, a large expanse of intact lanket bog also quasi-adjacent to Doolough Lake, was in turn converted to afforestation. As this is a private site, it is not fully relevant to the present submission. It is however significant that here again, proper site practices were not followed. Following a new complaint to the Forest Service Inspector, a visit was made to the site. While the Inspector upheld the rights of the operator to plant the blanket bog site, he did note that contrary to the conditions, the operators had dug the site right up to the roadside margin. The operators were subsequently asked to re-instate the roadside margins, which was done but could clearly not result in restoring the integrity of the ecosystem.

It is disheartening to see that no efforts are being done to follow good practices unless a member of the community or a voluntary environmental group objects. Even so, there are very little returns on such effort, and these concern only a tiny fraction of the forestry operations in the south Doolough area. To render our task even more difficult, following each of our interventions we are personally suffering renewed or deepened hostility from the people associated with forestry locally.

IV. SYNERGY OF WIND INDUSTRY WITH CONIFER AFFORESTATION

Our area is one among a number of localities in the west of Ireland heavily targeted by wind energy developers, due to the marginal nature of the land, and the relative isolation from population centers. In our small area of south Doolough in west County Clare there are four wind energy projects granted planning permission:

- Booltiagh, Kilmaley (planning permission in 2000),
- Letteragh/Boolynagleragh, Lissycasey (2003),
- Frure/High Street, Lissycasey (2004),
- Glenmore, Kilmihil (2004).

A fifth project at Cahermurphy, Kilmihil is currently appealed in An Bord Pleanala and a number of projects are notably in preparation locally. In addition, our area is about to be

zoned the only "preferred area for wind farms" in County Clare, despite in particular the presence of protected habitats and bird species such as the Hen Harrier [*Clare County Development Plan 2005-2011, adopted draft plan 2004 in consultation until 11 June, http://www.clare.ie/Public_Consultation.htm*]. All other wind projects in the county are currently distributed in the wider west Clare area.

The present submission does not deal in detail with the environmental consequences of wind industry in our area. This submission however retraces the synergy between the degradation of visual quality by forestry, and the inadequate planning process surrounding wind energy projects.

In the context of lobbying the EU for grant aid for afforestation, the degradation of landscapes by quasi-monocultures of Sitka spruce, historically largely attributable to Coillte, are routinely minimised. It is thus scandalous that this level of degradation can be now used as a justification for more visual degradation through the imposition of huge wind turbines on the landscape - and more grant aid. An Bord Pleanála's Inspector's report for the latest High Street, Lissycasey development for instance states that the proposed turbines "will significantly alter the nature of the landscape, but ...the landscape itself is much altered, most notably by large-scale coniferous plantation." [*Planning permission granted March 2004 by An Bord Pleanála, ref. PL03.204911*].

Thus we have a situation where marginal uplands are first degraded by conifer afforestation, and subsequently come under increased pressure from the wind industry. A more disturbing issue is the apparent facilitation by Coillte of such projects.

In Derrybrien Co. Galway, following the October 2003 landslide, issues about possible illegal clearfelling of Coillte conifer plantation prior to construction of the the wind farm are arising in the case currently being investigated by the EU. In our area, it is a strange coincidence that a large forest fire took place in sites of proposed and granted windfarm projects. The fires in April 2003 which affected Coillte forestry throughout the country, burnt 300 acres of forestry in our area: at Locknamina, Glenmore and Doolough. According to Coillte's regional forestry manager at the time, these fires cost Coillte around EUR600,000 [*Forest fires set to cost County over EUR1 million, The Clare Champion, 25 April 2003*].

Whereas a Gardai investigation reportedly took place, it is not known to the public what the result of this investigation was. The fire is widely rumoured locally to have been "malicious." We also heard from a Glenmore resident that a Coillte man who was posted to guard the first outbreak left his post prematurely twice, following which the fire started again. We are unclear whether Coillte have recouped their losses through insurance, whether they continue to draw grants prior to replanting, whether they receive grant aid to replant, whether they have a clearfelling licence to remove trees in the sites of turbines, and so on. Again, the Forest Service Inspector contacted on this subject refused to provide us with any information.

What is clear is that construction of the first windfarm of our area has commenced in the Booltiagh site, a site which was affected by the fire. Excavation of the first turbine base is apparently under way. The site, which we visited on 30 May 2004, has not been replanted yet, though an adjacent site subject of a planned proposal for eastern extension of the Booltiagh windfarm (signposted Midwestern Forestry) has been replanted. On a site visit it is odd to notice that a band of young trees bordering the road was untouched by the fire while the land bordering it where construction is taking place was burnt.

Whether or not the windfarm operators (DP Energy) and/or Coillte have their situation in order regarding clearfelling licences and forestry premiums is not known at this stage and we intend to investigate this matter. It is however already obvious at this stage that the fire

facilitates the construction operations. Some facts are emerging from the planning file for the Booltiagh wind farm [*Windfarm at Booltiagh, Planning ref P00/567, Clare County Council*].

The planning conditions on file dated 26 February 2004 for instance mentions the convenient screening by intact plantation: "...Additional screening will result from the band of existing forestry plantation which lies between the substation and the third class public road...this area of the forestry is one of the few areas which survived the recent fire intact intact ." (p.2)

While screening was left intact, the turbine sites themselves, which would have been in a growing plantation, were burnt ! The same document reads: "... with the exception of the turbines in turbary plots on the west of the site all turbines are located either in young forestry / disturbed ground or in burned forest and no virgin bog will be disturbed for the turbine footprint." (p.4)

Other documents on file point to the confusion regarding the responsibility for replanting. While we intend to pursue this matter, we would like to suggest that you, the Soil Association Woodmark, investigate this matter or at least question Coillte on their past, present and future role in the matter, including the history of this particular plantation (for instance, was it planted while the windfarm application was in the planning process ?). For your information we are enclosing a map of the turbine bases and potential tree height at Booltiagh.

V. CONCLUSION

In conclusion we strongly oppose the renewal of Coillte's FSC certification, based on our knowledge of forestry practices and the environmental and social impact in our area of the southern Slieve Callan uplands in west Clare. Non-native conifer forestry is slowly but surely destroying our area and there does not appear to be any significant difference between Coillte and private operators. There are a number of cases where a full investigation is needed as to the role of Coillte in facilitating a number of industrial developments throughout the country, notably wind power stations. None of this constitutes sustainable forestry, and the sustainable certification awarded to Coillte can only contribute to further degradation of our area. We welcome you to visit our area and are available to help you source further information.

APPENDICES

APPENDIX 1. Aerial photograph centering around Doolough Lake (taken in May 2000). This clearly shows the difference between the south Doolough area and the west and north which contain greener fields farmed more intensively. The south Doolough area contains the last remnants of a large system of boglands, lakes and streams and is thus vital for the biodiversity in an area of high pressure from conifer afforestation.

APPENDIX 2. Location and photograph of Coillte harvesting/replanting site 100 m south of Doolough Lake (March-April 2004).

APPENDIX 3. Map showing turbine bases and potential tree height in Coillte plantation in the Booltiagh windfarm site [*from: Planning reference 00/567 Construction of windfarm at Booltoagh Co Clare - Planning conditions to be complied with during and post construction, 26 February 2004*]