

CELT (Centre for Environmental Living and Training) And The Woodland League submission on the new Forestry Programme 2014 -2020

The framework and idea for Sustainable Forest Management (SFM) comes from the Forest Principles adopted at the Rio Earth summit 1992, which formed part of the Declaration on the Environment signed up to by 156 Nations including Ireland. This new Forestry Programme should ensure the objectives from Rio are adhered to.

From the preamble of the Forest Principles.

(b) Forest resources and forest lands should be sustainably managed to meet the social, economic, ecological, cultural and spiritual needs of present and future generations. These needs are for forest products and services, such as wood and wood products, water, food, fodder, medicine, fuel, shelter, employment, recreation, habitats for wildlife, landscape diversity, carbon sinks and reservoirs, and for other forest products. Appropriate measures should be taken to protect forests against harmful effects of pollution, including air-borne pollution, fires, pests and diseases, in order to maintain their full multiple value.

While we welcome the introduction of the new measures for agro-forestry, and forest fibre production as evidence of some progression within the narrow focus of the Irish Industrial forestry model, we are disappointed to note the lack of flexibility and options available within these proposed measures. We are also dismayed to see the lack of promotion of our more climate resilient, environmentally and socially richer native species in the new schemes as well as within some of the existing schemes.

Each year the wake-up calls are becoming louder, to diversify our forest tree species and prioritise our native species and woodlands. Ash dieback, Chalara Fraxinea and sudden oak death, Phytophthora Ramorum are now firmly established in the country affecting mainly non native tree species. The recent storms caused havoc for trees, mostly impacting on non native trees, we understand up to 8 million commercial conifers, more than 7000 ha, crashed down with more to follow due to the exposed nature of the blocks of trees left standing and exposed in many cases.

It is also extremely worrying to observe that the target of 17% treecover by 2030 attached to the current forestry plan, "Growing for the future" has now been adjusted to 18% treecover by 2046. This highlights the failure of the current forestry programme which has absorbed substantial amounts of public funding over many years and remains unable to meet its intended goal. The most recent National Forestry Inventory report shows a 0.5% increase in treecover between 2006 and 2013, at that rate it will take 52 years to reach 18% treecover. That is the year 2066 a long way off, can we afford to wait that long to only reach approx half the EU

average treecover of 44%. There is also the factor relating to the afforestation targets of 15000 ha to 20000 ha that were not achieved, instead low figures of 6000 ha per annum have become the norm. When this is matched to the allowable annual harvesting figures for this plan under the principle of sustained yield, we are fearful that the growing stock accumulation each year has fallen far short of what has been allowed to be harvested. This may actually lead to deforestation in the near future.

One final major obstacle to increasing our low treecover is the competition for land created by the governments plan to increase food production by 50%, under Food Harvest 2020, with desirable financial incentives for farmers to engage. This effectively removes large swathes of suitable land for afforestation immediately. We ask where will the extra 7% treecover come from in this new plan, when we are only at 11% now.

Taking all of the above into consideration we cannot see how this so called new plan for forestry in Ireland will ever achieve its objectives and justify the spending of more public money. No cost benefit analysis that takes into account the pressures on the plan which includes the real costs on soil, water, local communities and biodiversity of the negative side of the main Industrial model has ever been conducted. We feel the time for such an action is now, before embarking on another twenty years of negative coniferisation of our precious and vulnerable environment.

Under Measure 1. Afforestation and Creation of new woodlands.

Premiums for agroforestry should be increased to ten years in line with the wood fibre production premiums, otherwise farmers will not take this option up.

The 30% broadleaf requirement for afforestation must prioritise native species or at least ensure 20% is of native species.

Non native afforestation should be completely excluded from Natura 2000 and other ecologically sensitive areas currently being targeted by applications aided by the Forest Service.

Provision must be made to fund Independent ecological and water monitoring of new and existing forest sites on an annual basis.

Under measure 4.1.2 Agroforestry

Other options must be included in the measure such as prioritising riparian planting for the buffering protection against pollution run off from farms, stabilising of river banks, filtering of water and benefits for aquatic life, creation of coupes/copses on open land as well as marginal areas of farms using only native species. Imagination and flexibility must be used to ensure that this measure maximises its appeal for farmers, especially as it is the first time to be introduced.

Regards land suitability, recognition of natural regeneration via the plant succession process of native species should be allowable, which will improve poor land, this should allow for scrub to be recognised as an agroforestry option which could be funded via the native woodland scheme conservation measure as well.

The destruction of valuable scrub habitat all around the country right now is an absolute disaster for our Environment. There needs to be joined up thinking between the department of agriculture who are forcing the removal via the single farm payment criteria and the Forest Service whose remit is to increase and regulate/protect our extremely low tree cover. This is hardly an example of Smart agriculture/forestry, when the left hand of the same department blocks and diminishes the right hand. At the very least farmers should be given the option to retain scrub, for this to occur scrub must be recognised as the first stage of forest regeneration by the two departments. Joined up thinking is needed very urgently if the public are to have confidence in the same department of agriculture.

Under measure 4.1.2.2 Forestry for Fibre.

Hemp should be considered as a shrub for this measure. Teagasc have conducted extensive research into hemp with favourable results, it requires no fertilisers etc, and produces two crops per year under favourable circumstances whilst enriching the soil it grows in.

Native species such as birch, alder, and willow should be allowed as should SRC or short rotation coppicing for community wood fuel allotments, if this programme is genuinely interested in ensuring public goods and services are accumulating into the future.

Under measure 4.2 Forest roads

Monitoring for archaeology/ecology/water impacts should be part of the criteria for funding, and drains in uplands must no longer be permitted to run vertically down slopes, a herringbone design with shallower depth should be insisted upon, which is less damaging from an erosion point of view.

Under measure 4.3 Reconstitution of woodlands.

Use of native species proven to be less susceptible to climate pressure, e.g. storms and disease should be increased. The 30% broadleaf requirement should extend to this measure with a native stipulation, this should occur in buffering zones on the perimeter of plantations too to increase protection from wind pressure.

Under measure 4.4 Neighbourwood scheme

Emphasis should be placed on native species for all the known benefits, as well as the cultural heritage aspect which is currently ignored in our forest policy objectives. The Irish people are a woodland people with wonderful traditions legends, myths and ancient Brehon laws protecting trees and nature going back 3000 years. This needs to be reflected in the new Forestry Programme.

Areas of these woodlands set aside for SRC of native species, for community fuel allotments should be eligible for support under this measure too. Funding for managing invasive species where the woodland is an established one should receive support as well. The name could be changed to Neighbournativewood scheme to reflect the above.

Under measure 4.5 Woodland Improvement.

As for Neighbourwood scheme, funding specifically for invasive species management should be allocated, and the 30% broadleaf element for afforestation, with emphasis on native trees be introduced here.

Under measure 4.6 Native Woodland Scheme

Funding for invasive species management under Element 1- Conservation for existing valuable woodlands is needed. Recognition of natural regeneration via the succession process should be introduced to ensure that all aspects of native woodland creation are catered for.

A new element needs to be introduced to target coastal erosion which has been very much in focus this winter, native species adapted to coastal areas should be planted as shelterbelts to assist in our first line of defence against the Sea and Wind. This shelterbelt plan was in the original reforestation plan for Ireland produced by Horace Plunkett via the recess committee in 1897. Shelterbelts for inland areas are also needed and could be supported in this measure. A ten foot high shelterbelt gives one hundred feet of wind abeyance.

Under measure 4.7.1.3 Knowledge transfer/training.

Targeted training should include continuous cover forestry, low impact silvicultural systems including coppicing, this training should be opened up to communities for managing their own neighbourwood schemes.

Under measure 4.10 Forest Genetic Reproductive material

Support for tree nurseries to focus on native species to ensure long term supply of relevant stock must be provided. Oliver Rackham an authority on native woodlands states that the native trees are sensitive/adapted to within a ten mile radius and we should be planting areas with stock from within this ten mile radius. A commitment needs to be made to the nursery industry that long term multiannual funding is in place to ensure they can operate securely. This has been a huge problem in the past and remains a critical issue. It also makes so much sense to invest in this most indigenous industry which properly supported can provide long term employment for many people desperately seeking meaningful employment.

To finish, we reiterate the original aims and objectives of the 1896 Recess Committee report quoted above. It is interesting to observe this forestry plan was to be developed in tandem with the agricultural plan, showing they are two faces of the same coin and should be reintegrated again. The other important observation is that the Recess report is referring mainly to natural forests of broadleaves, in regards to their increased benefits, not monocultures of exotic conifers dependent on fertilisers and herbicides, and harvested by the primitive method of Industrial clear felling, with limited benefits for a minority of Irish society. Horace Plunkett is highlighting the benefits of a more natural forestry model/policy with maximum benefit for the common good, which translates to the Public Goods and Services which this forestry programme is charged with delivering under EU CAP and RDP criteria.

Prior to the foundation of Saorstát Éireann in 1922, Horace Plunkett, the founder of the co-operative movement, established the Recess committee in 1895. The Recess committee produced a report in 1896 which included the following enthusiastic recommendation for a national forestry plan to be developed in tandem with a national agriculture policy. This led to the establishment of the Department of Agriculture and Technical Instruction (DATI) for Ireland in 1899.

There is no reason why the country should not again largely recover its forest area. Of the existing area of so-called waste land, at least 3 million acres are calculated by competent authorities to be capable of growing one kind or another of timber; and with this extension of forests would come the very great and valuable variety of industries in connection with the working of wood.

To sum up the chief advantages of reforestation:

A shelter belt along the west coast would protect lands from the violence of Atlantic storms, which carry with them far inland many ingredients injurious to agricultural produce. The planting of mountains would tend to equalize rainfall and temperature, and prevent upland soils being washed away by torrents, and rivers being silted up and lowlands flooded. Forests help the preservation of birds, which prey on insects hurtful to crops. When planted on the banks of rivers they encourage the increase of fish by reason of their shade, the steady supply of water they

promote, and the insects and animal-culæ they bring which trout and salmon and their fry find their best food.

They lead to the propagation of forest game (such as pheasants, cock, deer, hares), and become preserves, the letting of which is to the State an important source of revenue. After a certain period, when the trees have grown, and the falling of the leaves has enriched the soil, the grazing of the forests becomes very valuable. There is further the value of the timber itself, and of the bye-products, (bark, charcoal, leaves, grasses, mosses, shrubs, weeds, fallen branches, resin, pitch, tar, turpentine), the intermediate agricultural products (flax, corn, potatoes, roots, fruits, truffles), and the series of wood-working industries (sawing, pole-making, cart and wheel-making, stave-making, handle-making, basket-making, etc). All these have been found to be actual accompaniments of forests in other countries.

SIGNED ; Andrew St Ledger,
on behalf of CELT and The Woodland League,

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