

4. Ireland's Commitments to Sustainable Forest Management

Sustainable Forest Management (SFM) is defined by the Helsinki Process as the “*stewardship and use of lands in a way, and at a rate, that maintains their biodiversity, productivity, regeneration capacity, vitality and their potential to fulfil, now and in the future, relevant ecological, economic and social functions, at local, national, and global levels, and that does not cause damage to other ecosystems.*” [1, Resolution H(1)]

The Irish State is committed to the principles of SFM as laid down during the Helsinki Process, as it is a signatory country to the process, along with 28 other European countries and 10 non-European countries [1].

4.1 Biodiversity

The commitments to SFM have been recorded in a number of State reports [2, 3]. However, the following statement was made in the Irish National Forest Standard, which is a standard developed to demonstrate the State's commitments to SFM: “*Due to site constraints and the limited number of suitable indigenous species, most of the afforestation [in Ireland] was accomplished with conifers of coastal North West American provenance*” [4]. This is an acceptance by the State that the coniferisation of Ireland's forests was, and still is, necessary.

The drive for coniferisation of Ireland was also demonstrated in a letter from the Dept. of Marine and Natural Resources (now Dept. for Communications, Marine and Natural Resources), in which Mr. Denis Maher (spokesperson) stated, as an excuse for the high levels of exotic conifers in Ireland: “*Broadleaves comprise only 10% of the forest estate in Finland with the balance (90%) in conifers*” [5]. What Mr. Maher, somewhat disingenuously, failed to note in this letter is that the majority of conifer forest estate in Finland comprises of native conifers, whereas in Ireland, in 2003, 93.5% of the Coillte's forests consisted of foreign exotic conifers, primarily the North American Sitka Spruce (in 1998, the situation was undoubtedly worse) [6].

There seems to be the suggestion throughout the State's published material on forestry that the climate and soil conditions in Ireland is unsuitable for native broadleaves, particularly in the Irish National Forest Standard, quoted above. This sentiment is simply a mistruth. Broadleaves grew in Ireland successfully for many thousands of years since the last major ice-age, when broadleaves and native evergreens, such as Scots Pine and Yew, virtually covered the island. Even 400 years ago, approximately 12.5% of the island was covered with primarily native forestry. In 1945, however, due to major deforestation over the course of several centuries, forest cover in Ireland was just 2%. [7]. It is only since this date that there has been a major coniferisation of Ireland's forests.

Exotic coniferisation and plantations to this degree are known to be disastrous for Biodiversity [8, 9]. This contradicts the Helsinki Process' definition of SFM (quoted

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at the beginning of this section), which puts particular emphasis on biodiversity and ecological effects of forestry.

In an international context, the Organisation for Economic Co-operation and Development (OECD), which is primarily interested in sustainability in an economic sense, also analyses threats to biodiversity. It lists three types of threats or pressures on biodiversity. The section states:

“Biodiversity is influenced by three types of pressures: physical (e.g., habitat alteration); chemical (e.g., exposure to contaminants); and biological (e.g. release of alien species)...” [10].

As described both above and below, the Irish policy of exotic conifer plantations applies the three pressures to biodiversity listed by the OECD:

- Afforestation of sites with, and conversion of native woodlands to, conifer plantations is a dramatic habitat alteration. The method of planting and felling with heavy machinery also constitutes a serious physical pressure.
- The extensive use of fertilisers on young plantations in particular seriously alters the soil and surrounding waterways, as described below (under waterways).
- The ratio of 93.5% exotic conifers in Coillte's state forestry, often in the form of mono-culture plantations, constitutes a serious lack of biological diversity. Exotic species are rampant in Irish forests as the forests themselves.

Analysis of the forest policies of other countries shows just how poor the Irish Forest Policy is when it comes to biodiversity. The United Kingdom, from which Ireland initially copied its forest policy, has now changed to a policy that is based more and more on native broad-leaved species, and places a far greater emphasis on nature conservation [11]. This change was partly based on irrefutable scientific evidence that massive coniferisation was damaging to the natural environment, the soil and water.

Similarly, the Helsinki Process, supported by almost all European countries, which is developing general guidelines for the sustainable management of forests in Europe, recommends using native species of local provenance and discourages the use of species outside their natural range. Across the Atlantic, the United States has recently switched from a policy of sustainable timber production to a policy that puts the maintenance of native biodiversity first and has as its first principle an ecological approach. Australia [12] and Canada [13] follow similar policies. In fact, Ireland is almost the only country which, having so few native woods left is now pursuing a purely commercial short term forest policy using massive amounts of completely alien species. [14]

A comparison with other European countries shows just how poor Ireland performs. In total, Ireland (public and private sectors) has 89.5% plantations, and 10.5% natural forests. In comparison, the European average is 3.1% plantations to 96.9% natural forestry. Of the countries listed below (from Central Europe), only Denmark and the United Kingdom come close to that ratio.

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Country	Total Land Area of Country		Forest Area			Natural Forestry	Plantation
	000 ha	000 acre	000 ha	000 acre	%	%	%
Austria	8,273	20,443	3,886	9,603	47.0%	100.0%	0.0%
Belgium and Luxembourg	3,282	8,110	728	1,799	22.2%	100.0%	0.0%
Czech Republic	7,728	19,096	2,632	6,504	34.1%	100.0%	0.0%
Denmark	4,243	10,485	455	1,124	10.7%	25.1%	74.9%
France	55,010	135,933	15,341	37,908	27.9%	93.7%	6.3%
Germany	34,927	86,306	10,740	26,539	30.7%	100.0%	0.0%
Hungary	9,234	22,818	1,840	4,547	19.9%	92.6%	7.4%
Ireland	6,889	17,023	659	1,628	9.6%	10.5%	89.5%
Liechtenstein	15	37	7	17	46.7%	100.0%	0.0%
Netherlands	3,392	8,382	375	927	11.1%	73.3%	26.7%
Poland	30,442	75,224	9,047	22,356	29.7%	99.6%	0.4%
Slovakia	4,808	11,881	2,177	5,379	45.3%	99.3%	0.7%
Switzerland	3,955	9,773	1,199	2,963	30.3%	99.7%	0.3%
UK	24,160	59,701	2,794	6,904	11.6%	31.0%	69.0%
Total Europe	2,259,957	5,584,475	1,039,251	2,568,045	46.0%	96.9%	3.1%
TOTAL WORLD	13,063,900	32,281,600	3,869,455	9,561,632	29.6%	95.2%	4.8%

Table: Comparison of the plantation:natural ratio of countries in Central Europe [15]

4.2 Peatlands

Forestry plantations and other vegetation sequester carbon. Under the Kyoto Protocol, sequestration of carbon by new forestry may be counted towards meeting Ireland's net greenhouse gas emissions growth limitation target. The increased forest coverage will help reduce our net emission of greenhouse gases and contribute towards achieving compliance with our Kyoto commitments. [16]

However, research has shown that peatlands can absorb more carbon per hectare and per year than tropical rainforests (notwithstanding plantations), and that standing stocks of carbon per hectare are also on average higher than in tropical rainforests. It is estimated that peatlands contain on average 5,000 tonnes of carbon per hectare and absorb carbon from the air at 0.7 tonnes per hectare per year. Globally, peat bogs contain more carbon than the entire world's tropical rainforests. They are estimated to store 3.0 - 4.6 x 10¹⁷ g C within 350 million ha (865m acres) [17, 18].

At this point in time, approximately half the area of plantation forestry in Ireland is on peatlands [19]. 84% of new Irish forestry plantation in the 1990-2000 period was on peatland [20].

Irish plantation forests are generally young and fast growing and new land is planted each year, the potential of the Irish forest estate to sequester carbon can only be

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estimated from desk studies until the results of detailed research are known. In many cases, such research tends to neglect carbon compartments difficult to study, in particular under-ground carbon stocks and fluxes. Therefore claims for plantation forestry's role as a carbon sink are unsupported by scientific data. The role of the entire forestry sector should also be taken into account, since wood processing industries are net consumers of fossil fuels and the fate of Irish wood products should be included.

When forestry plantations are established on peatlands, the additional potential for carbon losses arising from land use change is also very little known. Both methane and carbon dioxide molecules are involved in the carbon cycle of peatlands. Carbon losses following afforestation of peatlands are due to a number of factors, mostly related to drainage. Following drainage, carbon is lost in particulate form, particularly in the early phases (erosion in drain water), and in gaseous forms in later phases, as the drains and subsequent cracking tend to dry out the peatland and turn hydrological conditions from anaerobic to aerobic [18].

Without further research, the afforestation with plantations of peatland sites cannot be considered a positive move for carbon sequestration.

Since the implementation of the Kyoto protocol, a new threat is facing blanket bogs in Ireland. Because of their low monetary value due to low grazing value and poor access, blanket bogs are increasingly chosen as the potential site for land hungry industrial developments such as "wind farming" [18]. These windfarms are often in areas that, as well as being peatland, have also been under plantation [Example: Derrybrien Case Study, Doolough Case Study].

Peatlands are increasingly rare, and thus increasingly important, natural habitats. According to the Irish Peatland Conservation Council, at one stage 17% of the Republic of Ireland was peatland. At this point in time, due to mechanised turf extraction, intensification of agriculture and afforestation, only 19% of Irish peatlands remain intact. [21]. It is no coincidence that up to 50% of the sites in Northern Ireland designated as protected areas under the European Birds Directive and Habitats Directive are peatlands [22]. Every forestry plantation on peatland is a potentially important habitat lost. The conversion of peatland to plantation involves a vast reduction in biodiversity of the land, which again is a contravention of the principles of SFM, as well as the International Biodiversity Conference at Rio de Janeiro (1992).

Phosphorus and potassium fertilisation is essential on young cutaway peatland plantations to maintain tree growth at acceptable rates. However, cutaway peat has a very low capacity to absorb phosphorus fertiliser. Despite the fact that phosphorus fertiliser is applied after tree planting on cutaway bog sites, to a degree that is considered sufficient for the growth of the trees, research by the Forest Ecosystem Research Group, University College Dublin, has shown that phosphorus deficiency is widespread in plantation on cutaway peatland. The research concludes that there is a high runoff and leaching of phosphorus into the waterways after application of the fertiliser [23]. Phosphorus is considered one of the major sources of surface water pollution [24].

4.3 Waterways

The eutrophication of Ireland's waterways is considered the greatest threat to lake water quality [25] and to flowing water quality, such as rivers and streams [26]. The principal sources of phosphate and nitrogen compounds in Ireland are losses from agricultural activities, forestry and municipal and industrial waste discharges. [25]

As described in the section under peatlands, even though recently planted forests on peatland require extensive fertilization with, in particular, phosphorus, peatland is incapable of absorbing phosphorus. Thus, the phosphorus leaches into the lakes and waterways in or near the plantation, which in turn leads to the eutrophic pollution of these bodies of water.

The Lough Corrib Case Study is an example the eutrophication of a large body of water.

The siltation of waterways due to the mechanical methods of planting, felling and trenching plantation sites is also seen as a major threat to the integrity of waterways in or around forestry in Ireland [27, 28]. Additionally, research has shown that conifer plantations lead to the acidification of soils and groundwater, which in turn leads to the acidification of lakes, rivers and streams in or near the plantation [29].

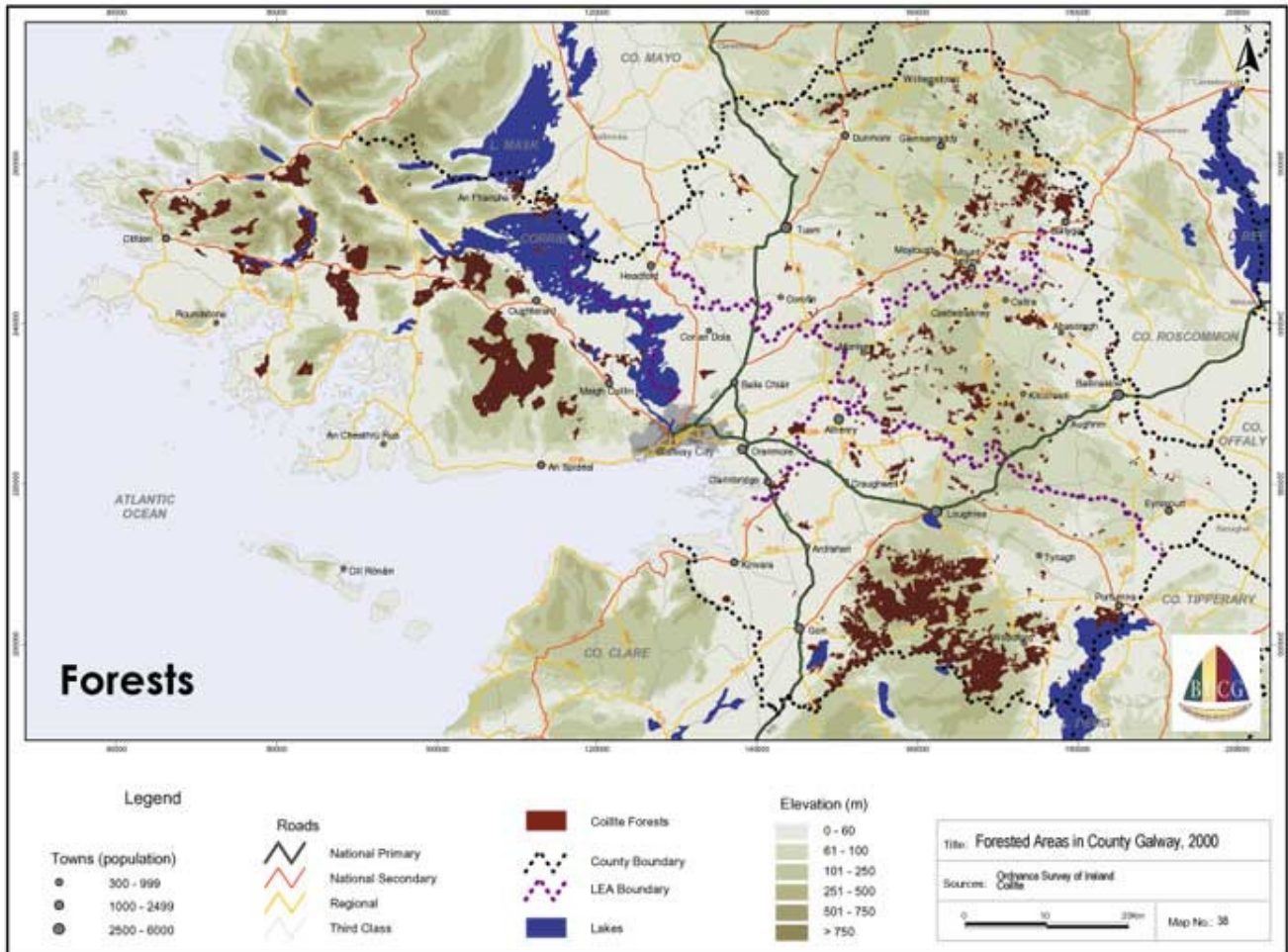
4.4 Indigenous People

The Helsinki Process' definition of SFM also puts emphasis on the social aspects of forestry. In 2003, in the Soil Association/Woodmark (FSC Auditors of Coillte) Draft Generic Standard, it was stated that there were no indigenous peoples affected by Coillte's plantations [30]. However, much of Coillte's plantations occur in marginal land in the western parts of Ireland, areas which are also traditionally parts of the Gaeltacht (the Indigenous Irish Speaking areas of Ireland given special status by the state since the 1930s).

The history behind this is that during the Cromwellian colonisation of Ireland in the 1600s, the native Irish were sent "to hell or to Connaught", i.e. that the natives had to flee to Connaught (the western seaboard of Ireland) or face slaughter. The land was considered worthless and marginal due to being boggy/hilly/rocky, while Cromwell granted his officers the most fertile land and primeval forest. (Connaught is the western province of Ireland). Thus the majority of Ireland's indigenous peoples ended up in Connaught, and retained the Gaelic language in these areas [31]. These areas became known as Gaeltacht areas.

Indeed, with the coniferisation that took place after 1945, forestry was only considered suitable for poor quality marginal land. Much of Connaught is under plantation as a result, and thus many of the indigenous Gaeltacht areas have plantations in them.

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Map of Forestry in Co. Galway, Connaught, Western Ireland. The Western regions of the map (west of the lakes) is part of the Gaeltacht regions of Ireland. This clearly demonstrates large tracts of State Forestry in indigenous Gaeltacht Areas.[32]. Non-coincidentally, the soil type in this area is also that of blanket bog. [33]

With this in mind, the statement that there are no indigenous peoples affected by forestry in Ireland seems ridiculous. Considering the emphasis placed on social functions by the Helsinki definition of SFM, it is obvious that Coillte, and thus the state, are not genuinely committed to the social requirements of SFM.

“Indigenous peoples must feel secure in their land tenure and play a central role in forest, land and resource management, in land-use systems and in conflict resolutions” [34]. When the state refuses to accept that indigenous people exist near forestry, this sentiment can be ignored. Coillte’s statements that there are no indigenous people affected by their forestry actions seems ridiculous considering the evidence above, and given the case studies in this document, particularly the Bellnaboy case study.

4.5 The FSC Certification of Coillte

The State uses the Forest Stewardship Council (FSC) certification scheme to verify its commitments to SFM, FSC being the largest and most reputable certification scheme [35, 41, 42]. The majority of the State’s forests, owned by Coillte Teoranta, are FSC

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certified [36]. Coillte obtained certification in 2001 in a contentious manner that has been described in Rainforest Foundation UK's report, *Trading in Credibility*:

"A 'pre-assessment' was carried out by SGS in December 1999. The main assessments were conducted in June and August 2000, and resulted in the raising of ten Major, and nine Minor, Corrective Action Requests. Further follow-up assessments were undertaken by SGS in February and April 2001. The certificate was issued in May 2001. A surveillance visit was conducted by SGS in November 2001..."

...Several aspects of the process of assessment raise doubts as to the appropriateness of the decision by SGS to issue the certificate:

- The assessment was conducted against the interim national standard. Whilst SGS's Public Summary certification report states that the national standard "was undergoing consultation at the time of assessment", it does not note...that the draft had not been derived through a properly constituted multi-stakeholder process, and was not approved by the representatives of two of the IFCI chambers.*
- There are doubts about the impartiality of the assessment team selected by SGS to carry out the assessment. Two of the local assessment team members picked by SGS were closely linked with Coillte and the Forest Service. Coillte evidently refused to accept other proposed candidates onto the assessment team.*
- Questions have been raised about SGS's understanding of the extent and nature of Coillte's landholdings. Whilst SGS's Public Summary Report refers to Coillte's holdings of "438,000 hectares of plantation and seminatural forest", Coillte's own reports acknowledge that some 90,000 hectares of this is 'unproductive' land, mostly consisting of heather and grass moorland and sedges, which are particularly important as habitat for wildlife. Some sources believe that as much as 160,000 hectares of Coillte's land requires the application of management values such as 'nature conservation and recreation' as well as timber production...the failure by SGS to fully comprehend the extent of Coillte's 'non-productive' holdings meant that "nowhere in the SGS assessment is there formal consideration or Management Plan distinguishing the management practices for these [non-forest] areas beyond the aspirational 'important role in the conservation and enhancement of biodiversity and nature conservation...'"*
- SGS also appeared to either seriously misunderstand or to misrepresent the extent of Coillte's afforestation efforts. The National Trust for Ireland has pointed out that, whilst SGS's Public Summary report claims that "through the 1990s afforestation rates have been consistently around the 20,000 hectare per annum", the only year in which afforestation actually reached 20,000 hectares was in 1995. Afforestation for every year from 1997-1999 was less than 13,000 hectares per year. These facts were readily available to SGS from the publicly accessible Forest Service database.*
- There are doubts about the adequacy of the consultation process undertaken by SGS. Of the 1000 stakeholder questionnaires circulated by SGS in their first round of consultation, only 14 written responses were received. Following suggestions from NGOs, the process for the second stage of consultation was reviewed and adjusted by SGS. Partly perhaps because of SGS's failure to understand the importance of Coillte in the management of*

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non-forest habitats, there was no consultation whatsoever with the Irish Peatland Council, Ireland's leading NGO on the country's peatland heritage.

- *There must be doubts about the process of 'closing-out' the various Major CARs that had been raised. Five of the Major CARs raised in SGS's August 2000 assessment were already closed out by SGS in December of that year. The remaining five were quickly 'downgraded' to Minor CARs (thus enabling a certificate to be awarded) in April 2001. As is discussed in more detailed below, the nature of the 10 Major CARs as originally issued by SGS would suggest that the 'closing out' must largely have been done on the basis of a stated intent on the part of Coillte to take corrective action, rather than that the relevant actions had actually happened. The largely aspirational nature of Coillte's proposed response to the CARs is indicated in SGS's Public Summary report, which notes that: "A series of meetings between Coillte and SGS Qualifor were convened following the completion of the main assessment in August 2000. The following is a summary of the actions and timeframes **proposed** by Coillte in October 2000 to address the major CARs" (emphasis added)*

What then follows in SGS's Public Summary report is a long list of very brief descriptions of the actions apparently proposed by Coillte. A number of the proposed actions have completion 'timelines' well beyond the actual date on which the certificate was issued." [37]

The report *Telling it Like it Is* goes on to list breaches in six of the ten FSC principles with the certification of Coillte.

In 2002, contract of auditing Coillte was passed from SGS to Soil Association/Woodmark. The standard that Woodmark used to certify Coillte was a combination of the Woodmark Generic Standard, the UK Woodland Assurance Standard, and the Irish FSC National Initiative Draft Standard [38].

The document, *Trading in Credibility*, has the following to say about the development of the Irish FSC Standard (IFCI is the steering committee of the Irish FSC National Initiative):

"Economic interests have from the outset, dominated the Irish National 'FSC process', whereas environmental interests have had virtually no capacity whatsoever to participate.

The inaugural meeting of the Irish Forest Certification Initiative (IFCI) in January 1999 was, according to environmental participants, "stacked with economic stakeholders". An early decision of the IFCI was the establishment of an additional chamber within the group to represent 'small timber growers'. Economic interests thus accounted for two of the four chambers, and held 50% of the votes. In addition to this structural imbalance, one of the members of the social chamber was connected to one of the 'economic stakeholders', and the organisation of one of the members of the environmental chamber, Crann, depends on government funding, and the organisation's president had been a director of Coillte for 5 years...

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...Thus, for the first year of the IFCI, NGOs were outnumbered, under resourced and poorly informed. Coillte meanwhile, was able to take a strong and dominating role, supported by other key economic stakeholders. As a consequence, all structures, processes and documents emanating from IFCI, including the Memorandum and Articles of Association and then the interim national certification standards, tended to favour economic interests...

...The environmental NGOs present within the working group suspended their participation in April 2000, in protest at what they saw as blatant 'rigging' of the group's composition. The groups requested the FSC Secretariat to intervene...

... Between May and September 2000, pressure was exerted on the environmental chamber members to reenter the process, including threats that they would be replaced by more 'agreeable' organisations. The absent organisations subsequently agreed to re-engage in the IFCI, subject to certain conditions...[Voice of Irish Concern for the Environment] explained that:

'Social and environmental stakeholders were faced with a choice of leaving the process and giving their place to stakeholders with less capacity and resources to participate, so we reluctantly chose to resume engagement in the process...' [37]

The Irish FSC National Initiative, which produced a standard that was used to certify Coillte, has been a nightmare for Irish NGOs, with abuse being delivered from the economic interests on a regular occasion, unchecked by the chairman [39, 40].

The certification of Coillte has been railroaded and controlled by Coillte themselves. It is interesting to note that until recently, Coillte were the only forestry company in Ireland to have FSC certified forests [36]. Therefore, the FSC certification of the State-owned Coillte forests cannot and should not be considered as verification of the State's commitments to Sustainable Forest Management.

4.6 References

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