



QUALIFOR PROGRAMME

ASSOCIATED DOCUMENTS

Number	AD 72
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Page	1 of 54
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Forest Management Surveillance Report
for
Coillte Teoranta

Surveillance Number 02
Forest Management Certificate Number SGS-FM/COC-0706
Date: May 2002

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1. Report checked by	Initials		Date	
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QUALIFOR Programme	Project Number	6880-ie
FOREST MANAGEMENT SURVEILLANCE REPORT	Company	Coillte Teoranta

SURVEILLANCE PUBLIC SUMMARY REPORT

Company	Job No
Coillte Teoranta	6880-IE
Surveillance Number	Surveillance Date
02	13-15 May 2002
Surveillance Results	
<u>Highlights</u>	
<p>Surveillance 02 was a partial surveillance audit, taking place over a three-day period. The remainder of the allocated surveillance days will be rescheduled for a later date. Three representatives of the FSC witnessed this audit.</p> <p>Having been called earlier than the normal period of a year, as well as undergoing significant changes within the organisation, Coillte had been unable to close out several of their existing minor CARs whose close out had been scheduled for a year from surveillance 01. Compliance with timetables in existing close out programmes was checked.</p> <p>Given that this visit comprised part of the full scheduled surveillance, certain outstanding CARs were given more attention than others based on the timescale of the programme to address them. Outstanding priorities for follow-up will be identified in this report and will be the focus of the next part of this surveillance.</p> <p>Coillte were still demonstrating a pro-active approach to certification and had made real progress in coming to issues such as “alternatives to clear fell”. Progress was still apparent as regards their biodiversity action programme for habitats and species and the identification and management of old woodlands and former old woodlands currently holding a plantation crop.</p> <p>Whilst consultation has improved significantly throughout the organisation, isolated problems still occur - consequently one new CAR was raised in part related to lack of adequate consultation.</p> <p>Coillte as an organisation has undergone significant changes since surveillance 01 with management changes and efficiency improvements aimed at making Coillte as efficient as its peers.</p> <p>Changes of significance include:</p> <ul style="list-style-type: none"> • the streamlining of the management structure - there are now four regions as opposed to six; • the focus is moving from regions to districts (13), which have the responsibility for the 36 FMUs. The latter’s boundaries will be aligned over five years to the district boundaries; • the separation of management planning from implementation – management planning is carried out at the district level with harvesting, sales and establishment managed at national level and called in by districts as required; • a new package has been introduced which has led to some 80 staff leaving. Key staff who have taken this offer are often being kept on part time to ensure smooth transition; 	

QUALIFOR Programme	Project Number	6880-ie
FOREST MANAGEMENT SURVEILLANCE REPORT	Company	Coillte Teoranta

- there are now three management boards defining strategic direction and policy, namely: Forests, Enterprises and Corporate.
- a performance management system has been introduced.

A new amendment to the QUALIFOR Ireland Checklist has also been introduced regarding species proportions as described later in the text.

This surveillance consisted of one day spent at Coillte head office in Dublin and two days based at Cork in what is now the Southern region, formerly regions 3 and 4. The latter two days consisted of field visits including: active harvesting sites, Farm Partnership Schemes, an “alternative to clearfell site”, establishment sites selected for aerial fertilisation and a quarry site on Coillte land.

Outstanding Corrective Action Requests monitored

Outstanding CARs fall into two categories, those issued at the main assessment that have yet to be closed out, and those issued at the last surveillance. As indicated in the highlights many previous CARs were not closed during this surveillance, as due to the early calling of this surveillance Coillte’s programme to address them had yet to be completed.

Assessment of CARs raised from initial audit

CAR 02 Consultation - Remains Open - *Whilst consultation is occurring it is not carried out in a proactive or systematic manner, nor is it implemented equally throughout Coillte. In particular, evidence of adequate, constructive responses to issues raised by the public is not available for all cases.*

Coillte’s strategy has yet to be completed, and there is still occasional evidence of poor consultation in individual cases (see CAR 27).

Coillte are still making progress in addressing this CAR. Sites visited showed evidence of consultation where appropriate. In the case of the Farm Partnership Scheme woodland, this comprised consultation with neighbours. In the Continuous Cover Woodland, additional consultation was provided by site notices. FMU plan consultation was seen in the case of one of the districts visited together with evidence of feedback and how stakeholder comments were incorporated into FMU plans. Coillte have a web site, which gives the facility for feedback. However, no comments had as yet been received and the design of the site is being considered to make it more user friendly. Evidence was also seen of effective consultation with other government departments. For example, on the Farm Premium Scheme an unknown archaeological monument was discovered by the contractor and appropriate consultation was seen to have been carried out.

A complaints log is kept in regional offices and the one in the Southern Region was inspected and found to be maintained, including responses to complaints. A list of complaints received at national level together with a record of actions taken was received and inspected.

Regional monitoring of complaints is also carried out and recorded by issue on FMU quarterly monitoring reports. The example of FMU 306 was inspected by the auditors.

Consultation is now included as one of the key objectives in Coillte’s new Performance Management System namely: *Ensure good consultation and that procedures relating to complaints are actively handled* and there is a requirement

QUALIFOR Programme	Project Number	6880-ie
FOREST MANAGEMENT SURVEILLANCE REPORT	Company	Coillte Teoranta

that documentary evidence is produced at interim reviews. Examples of individuals' performance management records were seen and inspected. **Observation:** these records should be inspected at future surveillances.

The social and environmental panels set up by Coillte continue to operate. However there is concern that there are dwindling numbers attending. Coillte are preparing a strategy for the revision of these panels and also considering the need for one at a national level.

As previously, there remain concerns about consultation with stakeholders over specific issues as they arise (i.e. there is a reactive approach in some cases). On one specific site complaints had not been replied to in a prompt and constructive manner and as a consequence one new minor CAR (27) has been raised to address this specific situation.

The table in appendix 1 of this report summarises Coillte's action plan to deal with this CAR and should provide benchmarks for the next surveillance.

CAR 03 – Restructuring – Remains Open - *The standard requires that large even-aged forests be restructured. While some restructuring is ongoing this is limited in extent and is not being carried out in a systematic planned manner. Forests are being dealt with in a coupe or piece meal basis rather than the entire forest as a whole.*

As may be seen from the time frames in the proposed strategy table below, there are both ongoing actions and those not scheduled for completion at the time of the first part of the 2nd surveillance. This programme is still far from complete. Consequently CAR remains open and is one of those to prioritise at the next part of this surveillance.

This process is continuing to be addressed in a systematic, planned manner through the Landscape Design Process. Evidence seen in this surveillance includes restructuring plans in place for FMUs 307 and 306 together with the identification of priority blocks for restructuring. Internal restructuring targets were seen to have been achieved in Southern Region e.g. in FMU 306 the target of 5 re-structured blocks had been achieved by the end of 2001.

Comments from surveillance 01:

Following the main assessment Coillte regional staff have initiated a prioritised system for planning and implementing restructuring. This process has run parallel with Coillte's programme of landscape design work, which has been supported by a programme of training. To assist implementation of the restructuring, corrective action guidance documents were prepared for use by regional staff. Each region has a landscape design team in place and a national landscape working group has been set up to ensure consistency. A protocol was established for identifying blocks that require restructuring – this is based on size (60 ha), species distribution and age class diversity. Blocks due for harvesting within the next 5-year period were identified through the inventory forecast and a landscape sensitivity analysis carried out to prioritise the blocks. Areas with higher landscape sensitivity and imminent felling dates are treated first. Regional programmes of restructuring have been prepared.

CAR 05 - Protection of Biodiversity - Remains Open - May 2000: *Features of biodiversity value are not being protected, and 15% of the forest area is not being managed as conservation areas and long-term retentions. There is no overall strategy to ensure that these requirements are being met, nor are they being implemented under current planning.* May 2001: *The existing plan of action does not*

QUALIFOR Programme	Project Number	6880-ie
FOREST MANAGEMENT SURVEILLANCE REPORT	Company	Coillte Teoranta

provide a timetable for agreeing broad management strategies and priorities for rare and vulnerable habitats and species. While responsibility for preparing BAPs in Ireland lies with Dúchas, The Heritage Service, Coillte should press on with these initiatives and should make a public commitment to preparing BAPs for habitats and species for which it retains significant stewardship.

Coillte have made good progress in the identification of areas of biodiversity and the management of 15% of its estate where biodiversity is the primary objective. This is being achieved through a structured plan of action outlined in appendix 1. However, this is an ongoing process and, as can be seen, many of the actions time tabled in Coillte's plan to address this CAR have yet to be accomplished. Consequently this CAR remains open.

Corrective action to address this CAR now has 4 main elements:

1. Identification and protection of small features of biodiversity value; Progress is still being made in the identification of these small features. For example in the last quarter of 2001, FMU 304 recorded 4 more features and FMU 306 11. This progress was seen to be recorded in Coillte's FMU monitoring procedure. At the next surveillance the application of newly identified features to maps and their use at site level needs to be monitored, as does data collection relevant to small biodiversity features from other organisations.

2. Identification and protection of 15% of each FMU with biodiversity as a key objective. Here again progress has been made. For example again with FMU 306 the ecological survey completed in early 2001, which had identified 22% of the FMU as potential biodiversity area, had now been "ground truthed". Consequently 15% of FMU 306 has now been identified as being managed primarily for biodiversity. The ecological survey for FMU 401 was now also complete. Overall seven FMU ecological surveys are now completed. The progress of management plans for "ground truthed" FMUs needs to be monitored.

The Farm Partnership Scheme visited in the course of this surveillance contrasted favourably with those observed during surveillance 01 with good use of the 15% of area designated for biodiversity, and intelligent use of existing features such as hedgerows which were both augmented and linked.

Biodiversity areas are to be mapped via a GIS layer. A prototype protocol for this layer has now been developed and was shown to the auditors. It has yet to be agreed and is consequently behind Coillte's current agreed schedule (see appendix 1 and observation re slippage in action plan time table).

3. Elements 2 & 3 of the actions to support this CAR are to be supported by a guideline for Coillte staff on habitats and species of nature conservation value. Coillte confirmed to the auditors that the first draft due from the consultants in April 2002 was still missing two chapters. The finalised text is due for June 2002 and should be in use for the next surveillance.

4. In addition, Coillte are preparing Biodiversity Action Plans (BAPs) for Annex 1 & 2 species from the EU Habitats Directive for which Coillte have a special responsibility. Timescales are given in appendix 1 for the completion of BAPs for four species/habitats namely: raised bogs, lesser horseshoe bat, hen harrier and the freshwater pearl mussel. The actions scheduled are all to be completed after the second surveillance and must be audited at surveillance 03. It again must be noted that this is a process in which there are as yet no national plans, and Coillte have

QUALIFOR Programme	Project Number	6880-ie
FOREST MANAGEMENT SURVEILLANCE REPORT	Company	Coillte Teoranta

been obliged to develop and co-ordinate this process themselves, which is consequently both complex and resource intensive.

Training of both staff and contractors as regards environmental protection and enhancement have continued since the last surveillance and the auditors were shown attendance sheets e.g. EIA course at Newcastle West 09 .05.2002.

CAR 07 - Game Bag Returns – Remains Open - *Where game species are shot under licences or leases an appraisal of local abundance of target species and the setting of appropriate cull levels was not always being carried out.*

As may be seen from Coillte's programme to close out this CAR most actions are due for completion post surveillance 02. This CAR therefore remains open until the next surveillance.

Comments from surveillance 01:

Coillte's standard operating procedures have been amended to include the notification of all holders of recreational bird hunting licences of Dúchas' listing of game species included in the 'Open Seasons' order. A pilot scheme, which requires licence holders to record and return game bags, has been implemented.

CAR 08 - Restoration of Valuable Habitats - Remains Open - *Where habitats have been colonised or planted but still retain valuable ecological characteristics, these should be restored or treated in a manner that does not lead to further loss of value. These areas need to be identified in a systematic manner and management plans written and implemented.*

The close out of this CAR is based on sites chosen for restoration via the ecological surveys of FMUs (CAR 5) and the old woodland survey (CAR 18) - the former is yet to be finalised. The Old Woodland Survey was completed in October 2001 and entered as a layer on the GIS, accessible to all users on 6 November 2001. In addition, items 2 & 3 from the proposed strategy to close out this CAR are yet to be finalised and 4 is ongoing (see appendix 1). This CAR remains open.

Comments from surveillance 01:

This CAR is closely linked to CARs 05, 17 and 18. Implementation of corrective action is based on the identification of 'potential biodiversity areas' and their subsequent survey, appraisal and development of management or restoration plans. While the identification of 'potential biodiversity areas' has been completed the subsequent survey is at an early stage. However, there has been good progress to date. Examples of valuable habitats include raised bogs, blanket bogs, heathland and species rich grasslands. Consultation with Dúchas and IPCC is ongoing and Coillte has proposed an EU-LIFE Programme funding bid for partial funding of restoration of sites identified through this process.

CAR 09 – Deadwood – Remains Open - *While deadwood habitats are in existence in some forests, this is not through any systematic and planned process, and therefore they are at risk from felling or re-structuring operations. Regional and FMU Plans did not adequately address the need to provide deadwood habitats across the estate either geographically (for example small scattered forest blocks) or within forest types (for example high production conifer plantations).*

The systematic process of building up, protecting and managing deadwood on Coillte land is ongoing. Good progress was seen on one of the clearfell sites visited with the contractor making intelligent use of existing dead wood and leaving or

QUALIFOR Programme	Project Number	6880-ie
FOREST MANAGEMENT SURVEILLANCE REPORT	Company	Coillte Teoranta

creating opportunities for the future, especially as regards standing deadwood. On another clearfell site there were less opportunities for deadwood but the contractor showed good understanding of the Forestry Service Guidelines. FMU plans still have a generic approach to deadwood without detailed strategies specific to individual FMUs. However, Coillte's current EIA protection and enhancement training manual provides a good appraisal methodology for deadwood and all staff questioned were also aware of the Forestry Service Guidelines. Restock sites visited in the course of this surveillance still showed some lack of consistency in the provision of standing deadwood. Deadwood surveys as seen in the quarterly monitoring reports were seen to be progressing.

Whilst there has been good progress in the close out of this CAR it remains open because, as may be seen in appendix 1, many of the actions instituted by Coillte to close this CAR have yet to be completed.

Comments from surveillance 01:

There had been significant work carried out in terms of development and implementation of a methodology to measure deadwood, including training of field staff and revision of the inventory code of practice. Deadwood is now measured as part of the forest inventory and this will provide good baseline data for monitoring deadwood across the Coillte estate. Deadwood is now mentioned within FMU plans. However, this is largely generic and does not provide adequate strategies on how deadwood will be provided within the individual FMUs. Further detail is required which identifies the current deadwood status and how this will be maintained or additional deadwood habitats will be provided. In the field, there is still limited understanding among staff in terms of potential deadwood habitats. There are examples of where managers have identified potential deadwood habitats in the form of mid-coupe retentions (Benbulbin). However, this level of understanding and implementation is still not common. It is therefore apparent that further implementation of CAR 09 is required at both the strategic and field levels.

CAR 12 - Chemical Usage – Remains Open - *The standard requires that each FMU has a chemical strategy to effect a reduction in chemical use. Chemical strategies were not complete for all FMUs and did not adequately identify specific means of reducing chemical use. Within some reduction strategies the information provided on chemical use was inadequately detailed.*

This CAR remains open to be reviewed at the next surveillance.

Comments from surveillance 01:

In order to address this CAR two working groups were set up – the chemical practice group and the pesticide committee, with the objective of analysing alternatives to chemicals and the impact of low chemical volume application. Establishment managers have received training on pesticide application and non-chemical alternative strategies. On a regional basis, strategies have been prepared which detail previous chemical use, current Coillte 'approved' chemicals, the potential combination of species, land types and pest control issues over the next 5 years, together with specific means to achieve the required rate of chemical reduction within each FMU. Strategies within the West Donegal, East Donegal, Pettigo, Wexford, Blackstairs Mountains and North Mayo FMUs were examined. The main means of chemical reduction are increased use of ground preparation, use of larger planting stock and the introduction of pre-treatment of plants in the nursery, as opposed to spraying on site. This last initiative has been introduced on a trial basis

QUALIFOR Programme	Project Number	6880-ie
FOREST MANAGEMENT SURVEILLANCE REPORT	Company	Coillte Teoranta

but has already shown dramatic reductions in chemical use. The above initiatives are however still at a preliminary stage.

CAR 15 - Management Planning Documentation - Remains Open - *The Standard requires that each actively managed forest should be covered by adequate management planning documentation. Issues are being addressed at Regional and FMU levels. However, adequate plans are not complete for all areas, despite high impact activities such as felling being carried out. In particular, management objectives for social and environmental long term objectives and strategies to deliver these were not adequate.*

Plans for Slieve Felim/Devils Bit, South West Kerry and West Cork were examined during this surveillance and whilst progress was seen (e.g. as regards incorporation of monitoring) the comments made from the previous surveillance still largely stand. Coillte subsequently informed SGS QUALIFOR that all 36 FMUs had plans at the time of the surveillance. This CAR remains open for checking at the next surveillance.

Comments from surveillance 01:

Management planning documentation is now available for all FMUs, and management plans have gone through a number of iterations following development of internal guidance and external consultation. The final tranche of FMU plans were in draft form at the time of the surveillance visit pending completion of the consultation process. Plans for West Donegal, East Donegal, Pettigo, Wexford, Blackstairs Mountains and North Mayo FMUs were examined during the surveillance visit. The plans provide a good overview of operations. However, many plans remain to have the results of biodiversity survey work under CAR 05 incorporated. Additionally, there is a general lack of specificity in relation to the strategic aims of forest management and clear objectives in each FMU. Many of the aims and objectives provided are generic and are identical across a number of FMUs. While there will be some degree of homogeneity, FMU plans must identify the features specific to each FMU and formulate individual plans and programmes to deal with these. This must also include the development of clearly identifiable and measurable objectives and targets related to the strategic aims.

CAR 16 – Monitoring – Remains Open - *The Standard requires that monitoring shall be carried out at an appropriate level. While a wide range of monitoring activities are carried out throughout the Regions, this is generally restricted to forest management and silvicultural activities. Monitoring of social and environmental parameters are less well established, are insufficient to demonstrate compliance with the Standard and do not always adequately address the particular issues of the FMU.*

Monitoring at both site and FMU level was seen in the course of this surveillance. Examples of site monitoring were seen at Coosane and Welstown and quarterly monitoring reports seen for FMUs 306 and 304. However, FMU monitoring still did not reflect key issues for the area covered. The draft management plan for LISS work at Ballydrehid also did not consider monitoring. Consequently this CAR remains open.

Comments from surveillance 01:

Monitoring at the operational level has been improved through the use of standard operating procedure monitoring requirements, for example of harvesting plans.

QUALIFOR Programme	Project Number	6880-ie
FOREST MANAGEMENT SURVEILLANCE REPORT	Company	Coillte Teoranta

These monitoring records are documented and kept in the relevant site files. Examples were seen at Morvagh, Dooish, Benbulbin, and were found to adequately record pertinent issues. FMU plans now also include a monitoring strategy which details key economic, social and environmental monitoring parameters. Examples of data collection against these parameters were seen during the surveillance visit. However the FMU monitoring strategies are largely generic and do not always adequately reflect the specific issues of individual FMUs (see comments, CAR 15, relating to identification and setting of specific FMU aims and objectives). Further refinement is required to ensure monitoring requirements adequately reflect individual issues in each FMU.

CAR 17 - High Conservation Value Forest Management - Remains Open - *The standard requires that High Conservation Value Forests (HCVFs) are managed in a manner which will maintain or enhance their attributes. While many of these semi-natural woodlands have individual management planning documents, not all semi-natural woodlands are covered by specific management prescriptions.*

The close out of this CAR is linked to the ecological surveys and old woodland surveys – the former have yet to be completed, as has a strategy for managing these areas. CAR 17 remains open.

Comments from surveillance 01:

This CAR is closely related to CARs 05 and 18. Through corrective action implemented to address CAR 05, the identification of ‘potential biodiversity areas’ in all FMUs has identified the location of all broadleaf high forest, mixed high forest and scrub across the Coillte estate. Corrective action addressing CAR 18 has identified the location of ‘old’ woodlands (areas identified on the 1830s OS maps and continuously covered in semi-natural woodland). This has allowed the programming of the survey of ‘old’ woodlands. These are given priority in the FMU survey process, which aims to assess the current conservation value, restoration potential and the location of features to be retained and enhanced within ‘old’ woodlands. This work is scheduled to take place over the next 4 years. Examples of the output from the survey were seen during the surveillance visit. The results of the survey work are then used to develop management prescriptions for these sites.

CAR 18 - Plantations on Semi-natural Woodland Sites – Remains Open - *The standard requires that plantations on former semi-natural woodland sites are managed in a manner that retains and enhances their semi-natural characteristics. While this is being carried out on a limited number of sites, there has been no systematic implementation of this requirement across all regions.*

This CAR, as with CAR 17, is linked to ongoing survey work, and is also linked to the Forests Service Native Woodland Scheme which will provide significant funding. This process is ongoing. Hence, CAR 18 remains open.

The Forest Service Native Woodland Scheme is also being used to fund the restoration of old woodlands. An example of a proposed site was visited during this surveillance (Bansha Wood). Proposals discussed at the wood included planting with broadleaves, although it was apparent that there was excellent broadleaved regeneration in many areas.

Regarding selection of sites, a strategic approach is being adopted by the company to ensure that applications are not random, but rather directed at addressing the management of semi-natural woodlands of key importance. The creation of riparian

QUALIFOR Programme	Project Number	6880-ie
FOREST MANAGEMENT SURVEILLANCE REPORT	Company	Coillte Teoranta

woodlands in acid and biologically sensitive rivers is also being planned. An overall project plan for the period of the scheme (2002-2006) is being developed. Appropriate areas identified during the FMU surveys are being included in the scheme. A complete list of all sites amounting to 10,000 ha is being drawn up according to set procedures. Applications are vetted by the Forest Service and Duchas, before approval is given, to ensure the suitability of the site. A management plan is then drawn up by an independent ecologist and a forester (both approved by the Forest Service) which is again submitted for consideration by the Forest Service. Depending on the importance of the site, further consultations will take place with Duchas, Fishery Boards etc. before work begins. The checks and balances in the system are such that only sites worthy of inclusion in the Scheme, approved by the competent authorities, will receive funding.

Observation: the way in which Coillte uses the native woodland scheme to restore woodlands needs to be monitored at future surveillances to ensure that appropriate measures are being taken to restore individual native woods.

Comments from surveillance 01:

The process for identification, survey and development of management prescriptions for these sites is identical to the corrective action proposed within CAR 17. While the early examples of implementation (Slieve Bloom FMU) are encouraging, the corrective action is similarly at an early stage.

CAR 19 - Species Proportions – Remains Open - *The standard requires that species chosen for plantations are suited to the site and matched to management objectives.*

New requirements for species proportions were given at the opening meeting of this surveillance as detailed below on the basis of consultation with stakeholders. Coillte expressed concern that firstly they had not been sufficiently consulted and secondly that these new requirements were going to be uneconomic to achieve. Coillte now intend to analyse the potential impact of these new requirements as part of close out for this CAR.

New requirements:

Where at least two species are suited to the site and matched to the objectives:

<65% primary species

>15% secondary species

>20% broadleaves and open space (including at least 15% native broadleaves or open space, where the presumption will be to favour native broadleaves unless alternative management has a higher conservation or biodiversity value, with a minimum of 5% native broadleaves on all sites)

Where only one species is suited to the site and matched to the objectives:

<75% primary species

>25% broadleaves and open space (including at least 15% native broadleaves or open space, where the presumption will be to favour native broadleaves unless alternative management has a higher conservation or biodiversity value, with a minimum of 5% native broadleaves on all sites)

Coillte's strategy to achieve species proportion requirements via the FMU planning

QUALIFOR Programme	Project Number	6880-ie
FOREST MANAGEMENT SURVEILLANCE REPORT	Company	Coillte Teoranta

process is still not complete and will now require amendment in the light of the new requirements. The whole issue of species proportions is contentious and has attracted stakeholder comment. It is worth noting that stakeholder comment regarding species proportions for the Slieve Felim FMU was based on achieving 20% broadleaves rather than the species proportions required in the QUALIFOR Ireland Checklist. Species proportions planned for 2030 for West Cork FMU were inspected and indicated that the new requirements could be met (assuming the management of open space at 10.5% can be justified for reasons of biodiversity). Namely, primary species 58.9%, secondary species 20.5%, broadleaves 10.1% and open space 10.5%. Current progress against this target was also seen to be recorded on the quarterly FMU monitoring report. **Observation:** The issue of species proportions and Coillte's progress towards meeting these requirements must be given a high priority at the next surveillance.

Comments from surveillance 01:

This CAR is closely linked with the corrective action implemented to address CARs 03 and 15, work on which is still ongoing, and both CARs remain open. While many FMU plans now detail how the minimum species percentages will be achieved this does not apply to all FMUs. This work is dependent on the restructuring and management planning process.

CAR 20 - Low Impact Silvicultural Systems – Remains Open - *While a series of trial Low Impact Silvicultural Systems (LISS) areas has been selected as alternatives to clearfell systems, there has been no integrated appraisal of the potential for or consequences of adopting LISS at local, regional or corporate levels.*

Good progress has been made against this CAR with the LISS group reconfigured. A new detailed examination of potential LISS sites has been undertaken using new guidelines, with some 496 hectares currently selected in a process due for completion in September 2002. Analysis of LISS systems on volume production is currently being undertaken. One LISS site was visited during the audit, and its management plan examined. Work already undertaken showed a good understanding of Continuous Cover Forestry (CCF), with the LISS system chosen including both heavy thinning and small coupes used to foster natural regeneration. The management plan, whilst detailing proposed operations, did not indicate how objectives would be monitored. LISS issues should be followed up at the next surveillance and note should be taken of the range of site types (crop age, yield class, location etc) chosen.

Whilst there has been progress, this car could not be closed as the proposed strategy had yet to be completed. CAR 20 remains open.

CAR 21 - Biodegradable Lubricants – Remains Open - *While research trials have been carried out and data is still being analysed, there has been no plan developed by Coillte which identifies how biodegradable lubricants will be phased in over time to both Coillte and third party operations.*

Coillte have now timetabled the phasing in of bio-lubricants for both chainsaws (bar and chain lubrication) and harvesting machinery (bio hydraulic oil). See Action Plan in appendix 1. Good evidence of progress was available. For example, receipts were inspected for the purchase of bio chainsaw lubricant oil for training programmes, and copies of correspondence with the Irish Forest Contractors Association (IFCA) informing them of Coillte's intention to introduce bio oils were seen. Contractors interviewed on site were also found to be aware of Coillte's intentions to introduce bio oils. However, despite good progress the majority of Coillte's planned action to

QUALIFOR Programme	Project Number	6880-ie
FOREST MANAGEMENT SURVEILLANCE REPORT	Company	Coillte Teoranta

close this CAR has yet to be completed. Consequently this CAR remains open.

CAR 22 - Forestry and Water Quality Guidelines – Remains Open - *There is non-compliance with the Forestry and Water Guidelines.*

The Farm Partnership and two planting sites visited both showed good compliance with water guidelines, with adequate buffer zones and silt traps. In all cases water, where running, was clear. The assessors were also shown an A4 display card graphically illustrating aspects of flow control measures, which was about to be issued to drainage contractors. However on an existing site proposed for aerial fertilisation, drainage channels were seen discharging into a water course - a situation which Coillte staff were aware of. The latter problem, and the fact that the action plans scheduled to close this CAR have yet to be completed, mean that this CAR remains open.

Observation: Concern was expressed regarding adherence to the Forestry and Water Guidelines concerning the planting of conifers close to watercourses on Farm Partnership Schemes. This should be followed up at the next surveillance.

CAR 23 – Overloading – Closed - *Despite requests from Coillte haulage trucks continue to be overloaded, especially in standing sales operations.*

Coillte have taken decisive action to address the problem of overloading and have largely stopped overloading by hauliers transporting their own timber. Coillte's delivery weights in the month of May to their OSB plant were inspected and only three loads were found to be overweight, and then only by a margin of two tonnes. However, there is still a problem with loads from standing sales, as was evident from lorries leaving a harvesting site visited during the course of this audit, and confirmed by an inspection of Coillte's load monitoring from this site.

In order to combat the latter problem Coillte are:

- selecting the top ten gross weights in a month and suspending haulage from timber from the sites identified as well as continuing to invoice the company concerned;
- reserving the right to suspend haulage if roads are damaged and also to recoup the cost of repairs from the haulier.

Evidence was also seen of Coillte's communication on overloading and their intended measures to tackle the problem, with all stakeholders concerned.

Observation: The stakeholder representing many hauliers expressed concern that, when Coillte's measures take force, current haulage costs will not be adequate to sustainably transport loads reduced to legal levels. The success of Coillte's measures to address the issue of overloading of timber lorries will need to be monitored at the next surveillance. However, due to the company's proactive measures, CAR 23 is closed.

Minor CAR 25 – Consultation – Remains Open - *Inadequate consultation relating to an unusual or high impact operation in County Mayo.*

This CAR raised as a result of a lack of informing and consulting a local community regarding the sale of land for a development project has been dealt with in two ways.

Firstly, there has been an acknowledgement on the part of Coillte that they will not simply rely on the planning process and developer to inform the public as regards the sale and development of Coillte lands by other parties. To this end there is now a

QUALIFOR Programme	Project Number	6880-ie
FOREST MANAGEMENT SURVEILLANCE REPORT	Company	Coillte Teoranta

new proposed consultation policy through which local interest groups will be informed at the sales negotiation stage and the pre-contract stage. There are also specific procedures for dealing with consultation over Coillte's own development of its land holding, depending on size or type of proposal.

Secondly, the local community involved in the Mayo project have been contacted and informed of this policy change and also invited to give their views on this matter. The group have also been given the opportunity to have a meeting concerning the particular sale that affects them.

As this new policy is still in draft form, CAR 25 remains open, subject to verification of the adoption and use of the policy, and evidence of adequate stakeholder consultation.

Minor CAR 26 - Hunting - Closed - *Lack of evidence that hunting practices on sites in County Galway comply with legal requirements and relevant Codes of Practice.*

This CAR was based on information from a stakeholder that fox earths had been dug up. Evidence produced by Coillte, including their own site monitoring, and correspondence with the stakeholder did not enable the auditors to establish who the perpetrators were - but it appeared unlikely to be the hunt. It was also felt that Coillte had dealt with the problem in an effective way.

From Coillte's written agreement with the hunt, clearly marking routes through the forest concerned, it also appears unlikely that the hunt do anything but pass over Coillte property - again confirmed by Coillte monitoring.

Coillte also confirmed that it is their policy not to allow fox hunting on or through their land, except where there are historic rights. Consequently, only three hunts use Coillte land.

In order to further address this CAR, Coillte have revised their action plan in appendix 1. The company now proposes to make the hunt licence for the other licensed hunt conditional on not digging up foxes, and also to send out this policy to the Association of Foxhounds for circulation to all hunts.

Confirmation of these actions should be sought at the next surveillance, but in view of the actions taken by Coillte, this CAR 26 is closed.

New Corrective Action Requests raised

One new minor corrective action request was raised:

CAR 27 – Shanbally Edmond Quarry - A quarry on Coillte land did not comply with legislation, as it did not have planning permission. In addition, Coillte had not taken all reasonable measures to stop illegal or unauthorised activity at this quarry, nor had they consulted adequately with local people regarding the impacts of the quarry, or mitigated its impacts quickly or decisively.

Other issues (including issues raised by stakeholders)

Observation: Timetables for the variety of the actions scheduled to close out CARs needs to be monitored for slippage.

Observation: The use of local contractors needs to be monitored, as there is some stakeholder concern that new methods of tendering for standing timber sales have prejudiced their use.

QUALIFOR Programme	Project Number	6880-ie
FOREST MANAGEMENT SURVEILLANCE REPORT	Company	Coillte Teoranta

Observation: The issue of species proportions and Coillte's progress towards meeting these requirements must be given a high priority at the next surveillance.

Observation: Verification is required to determine whether there is adequate adherence to the Forestry and Water Guidelines concerning the planting of conifers close to watercourses on Farm Partnership Schemes. This should be followed up at the next surveillance.

Observation: The stakeholder representing many hauliers expressed concern that, when Coillte's measures take force to tackle problems of overloading, current haulage costs will not be adequate to sustainably transport loads reduced to legal levels.

Observation: The way in which Coillte use the native woodland scheme to restore woodlands needs to be monitored at future surveillances to ensure that appropriate measures are being taken to restore individual native woodlands.

Observation: Concern was expressed by a stakeholder regarding the selection of sites by Coillte for aerial fertilisation. All such sites are submitted to the Fisheries Board for approval. The latter organisation feel that sites submitted by Coillte do not meet the criteria in current Forestry and Aerial Fertilisation Guidelines. Three such sites were visited as part of the surveillance and two did not meet the Guideline's recommendation - namely that appropriate sites should be on "mineral soils which have no cultivation drains". The two sites in question both had drainage channels directly connected to watercourses feeding the local catchment. Coillte's argument that the Fisheries Board in effect "police" this situation is not adequate, and they should not be recommending sites for aerial fertilisation in contravention of current guidelines. This issue must be more fully investigated at the next surveillance.

Additional Stakeholder issues not covered by CARs/observations

Proposed development of a Woodland Experience amenity scheme along with a communal care centre/retirement unit and a hotel and leisure complex - This issue concerned the proposed project outlined above in a Coillte wood and a local development co-operative. However, this was opposed by a local preservation society. Evidence was shown to the assessors of good ongoing consultation by Coillte concerning this project and of active changes regarding access and location to accommodate local concerns.

An additional stakeholder complaint was received concerning risk assessments not being carried out by Coillte's harvesting contractors and overloaded timber lorries. As regards the former complaint, risk assessments were inspected on the active harvesting sites visited and found to be in order. The issue of overloading is addressed in CAR 23.

Change to certificate schedule

None

Recommended date for next surveillance visit

First quarter 2003

QUALIFOR Programme	Project Number	6880-ie
FOREST MANAGEMENT SURVEILLANCE REPORT	Company	Coillte Teoranta

FOREST MANAGEMENT SURVEILLANCE DETAILED FINDINGS

Departments and areas checked

Coillte Head Office - Dublin

Coillte Southern Region

Regional Office – Cork

Ballydrehid – LISS trial woodland/Trial CCF site

Bansha Wood - Proposed Native Woodland Restoration Site/Old woodland site

Newhill – Restock / Proposed Aerial Fertilisation Site

Noard - Restock / Proposed Aerial Fertilisation Site

Glengoole North - Restock / Proposed Aerial Fertilisation Site/ Drainage

Knockmehll, Quinns – Farm Partnership Scheme/Restock/Drainage/Archaeology/Site design

Coosane – Planting/drainage/harvesting /deadwood/broadleaf retentions

Welstown – Harvesting/Haulage

Shanbally Edmond – Quarry on Coillte land

Stakeholder Meetings

Irish Forestry Contractors Association - Cork

Local Stakeholders

Quarry Site at Tipperary

The Southern Regional Fisheries Board – Tipperary

Observations

Outstanding Corrective Action Requests Monitored

Outstanding CARs fall into two categories, those issued at the main assessment which have yet to be closed out, and those issued at the last surveillance. As indicated in the highlights many previous CARs were not closed during this surveillance as, due to the early calling of this surveillance, Coillte's programme to address them had yet to be completed.

CARs raised from initial audit

CAR 02 - Consultation - Remains Open - *Whilst consultation is occurring it is not carried out in a proactive or systematic manner, nor is it implemented equally throughout Coillte. In particular, evidence of adequate, constructive responses to issues raised by the public is not available for all cases.*

Coillte's strategy has yet to be completed. There is still occasional evidence of poor consultation in individual cases (see CAR 27).

Coillte are still making progress in addressing this CAR. Sites visited showed evidence of

QUALIFOR Programme	Project Number	6880-ie
FOREST MANAGEMENT SURVEILLANCE REPORT	Company	Coillte Teoranta

consultation where appropriate. In the case of the Farm Partnership Scheme woodland (Quinns) this comprised of consultation with neighbours. In the Continuous Cover Woodland (Ballydrehid) additional consultation was provided by site notices. FMU plan consultation was seen in the case of one of the districts visited, together with evidence of feedback and how stakeholder comments were incorporated into FMU plans. Coillte have a web site which gives the facility for feedback. However, no comments had as yet been received and the design of the site is being considered to make it more user friendly. Evidence was also seen of effective consultation with other government departments. For example, on the Farm Partnership Scheme an unknown archaeological monument was discovered by the contractor and appropriate consultation was seen to have been carried out.

A complaints log is kept in regional offices and the one in the Southern Region was inspected and found to be maintained, including responses to complaints. A list of complaints received at national level, together with a record of actions taken, was inspected.

Regional monitoring of complaints is also carried out and recorded by issue on FMU quarterly monitoring reports. The example of FMU 306 was inspected by the auditors.

Consultation is now included as one of the key objectives in Coillte's new Performance Management System namely: *Ensure good consultation and that procedures relating to complaints are actively handled*, and there is a requirement that documentary evidence is produced at interim reviews. Examples of individuals' performance management records were seen and inspected. **Observation:** these records should be inspected at future surveillances.

The social and environmental panels set up by Coillte continue to operate. However there is concern that there are dwindling numbers attending. Coillte are preparing a strategy for the revision of these panels and also concerning the need for one at a national level.

As previously, there remain concerns about consultation with stakeholders over specific issues as they arise (i.e. the approach is reactive in some cases). On one specific site, complaints had not been replied to in a prompt and constructive manner and as a consequence one new minor CAR (27) has been raised to address this specific situation.

The table in appendix 1 of this report summarises Coillte's action plan to deal with this CAR and this should provide benchmarks for the next surveillance.

CAR 03 – Restructuring – Remains Open - *The standard requires that large even-aged forests be restructured. While some restructuring is ongoing this is limited in extent and is not being carried out in a systematic planned manner. Forests are being dealt with in a coupe or piece meal basis rather than the entire forest as a whole.*

As may be seen from the time frames in the proposed action plan to address this CAR (appendix 1) there are both ongoing actions and those not scheduled for completion at the time of this part of the 2nd surveillance. This programme is still far from complete. Consequently this CAR remains open and is one of those to prioritise at the next part of this surveillance.

This process is continuing to be addressed in a systematic, planned manner through the Landscape Design Process. Evidence seen in this surveillance included restructuring plans in place for FMUs 307 and 306, together with the identification of priority blocks for restructuring. Internal restructuring targets were seen to have been achieved in Southern Region e.g. in FMU 306 the target of 5 re-structured blocks had been achieved by the end of 2001.

Comments from surveillance 01:

Following the main assessment Coillte regional staff have initiated a prioritised system for planning and implementing restructuring. This process has run parallel with Coillte's programme of landscape design work, which has been supported by a programme of training. To assist

QUALIFOR Programme	Project Number	6880-ie
FOREST MANAGEMENT SURVEILLANCE REPORT	Company	Coillte Teoranta

implementation of the restructuring, corrective action guidance documents were prepared for use by regional staff. Each region has a landscape design team in place and a national landscape working group has been set up to ensure consistency. A protocol was established for identifying blocks which required restructuring – this is based on size (60 ha), species distribution and age class diversity. Blocks due for harvesting within the next 5-year period were identified through the inventory forecast and a landscape sensitivity analysis carried out to prioritise the blocks. Areas with higher landscape sensitivity and imminent felling dates are treated first. Regional programmes of restructuring have been prepared.

CAR 05 - Protection of Biodiversity – Remains Open - May 2000: *Features of biodiversity value are not being protected, and 15% of the forest area is not being managed as conservation areas and long-term retentions. There is no overall strategy to ensure that these requirements are being met, nor are they being implemented under current planning.* May 2001: *The existing plan of action does not provide a timetable for agreeing broad management strategies and priorities for rare and vulnerable habitats and species. While responsibility for preparing BAPs in Ireland lies with Dúchas, The Heritage Service, Coillte should press on with these initiatives and should make a public commitment to preparing BAPs for habitats and species for which it retains significant stewardship.*

Coillte have made good progress in the identification of areas of biodiversity and the management of 15% of its estate where biodiversity is the primary objective. This is being achieved through a structured plan of action outlined in appendix 1. However, this is an ongoing process and, as can be seen, many of the actions time tabled in Coillte's plan to address this CAR have yet to be accomplished. Consequently this CAR remains open.

Corrective action to address this CAR now has 4 main elements:

1. Identification and protection of small features of biodiversity value - Progress is still being made in the identification of these small features. For example, in the last quarter of 2001, FMU 304 recorded 4 more features and FMU 306 11. This progress was seen to be recorded in Coillte's FMU monitoring procedure. At the next surveillance the application of newly identified features to maps and their use at site level needs to be monitored, as does data collection relevant to small biodiversity features from other organisations.
2. Identification and protection of 15% of each FMU with biodiversity as a key objective - Here again progress has been made. For example, again with FMU 306 the ecological survey completed in early 2001, which had identified 22% of the FMU as potential biodiversity area, had now been "ground truthed". Consequently, 15% of FMU 306 has now been identified as being managed primarily for biodiversity. The ecological survey for FMU 401 is now also complete. Overall, seven FMU ecological surveys are now complete. The progress of management plans for "ground truthed" FMUs needs to be monitored.

The Farm Partnership Scheme visited in the course of this surveillance (Quinns) contrasted favourably with those observed during surveillance 01, with good use of the 15% of area designated for biodiversity, and intelligent use of existing features, such as hedgerows which were both augmented and linked.

Biodiversity areas are to be mapped via a GIS layer. A prototype protocol for this layer has now been developed and was shown to the auditors. It has yet to be agreed and is consequently behind Coillte's current agreed schedule (see appendix 1 and observation re slippage of action plan time scales).

3. Elements 2 & 3 of the actions to support this CAR are to be supported by a guideline for Coillte staff on habitats and species of nature conservation value. Coillte confirmed to the auditors that the first draft due from the consultants in April 2002 was still missing two chapters.

QUALIFOR Programme	Project Number	6880-ie
FOREST MANAGEMENT SURVEILLANCE REPORT	Company	Coillte Teoranta

The finalised text is due for June 2002 and should be in use for the next surveillance.

4. In addition, Coillte are preparing Biodiversity Action Plans (BAPs) for Annex 1 & 2 species from the EU Habitats Directive for which Coillte have a special responsibility. Timescales are given in appendix 1 for the completion of BAPs for four species/habitats - namely: raised bogs, lesser horseshoe bat, hen harrier and the freshwater pearl mussel. The actions scheduled are all to be completed after the second surveillance and must be audited at surveillance 03. It again must be noted that this is a process in which there are as yet no national plans, and Coillte have been obliged to develop and co-ordinate the process themselves. This is consequently both complex and resource intensive.

Training of both staff and contractors as regards environmental protection and enhancement have continued since the last surveillance and the auditors were shown attendance sheets e.g. EIA course at Newcastle West 9 .5.2002.

CAR 07 - Game Bag Returns – Remains Open – *Where game species are shot under licences or lease, an appraisal of local abundance of target species and the setting of appropriate cull levels was not always being carried out.*

As may be seen from Coillte's programme to close out this CAR, most actions are due for completion post surveillance 02. This CAR therefore remains open until the next surveillance.

Comments from surveillance 01:

Coillte's standard operating procedures have been amended to include the notification of all holders of recreational bird hunting licences of Dúchas' listing of game species included in the 'Open Seasons' order. A pilot scheme which requires licence holders to record and return game bags has been implemented.

CAR 08 - Restoration of Valuable Habitats – Remains Open - *Where habitats have been colonised or planted, but still retain valuable ecological characteristics, these should be restored or treated in a manner that does not lead to further loss of value. These areas need to be identified in a systematic manner and management plans written and implemented.*

The close out of this CAR is based on sites chosen for restoration via the ecological surveys of FMUs (CAR 5) and the old woodland survey (CAR 18) - the former is yet to be finalised. The Old Woodland Survey was completed in October 2001 and entered as a layer on the GIS, accessible to all users on 6 November 2001. In addition, items 2 & 3 from the proposed strategy to close out this CAR are yet to be finalised and 4 is ongoing (see appendix 1). This CAR remains open.

Comments from surveillance 01:

This CAR is closely linked to CARs 05, 17 and 18. Implementation of corrective action is based on the identification of 'potential biodiversity areas' and their subsequent survey, appraisal and development of management or restoration plans. While the identification of 'potential biodiversity areas' has been completed, the subsequent survey is at an early stage. However, there has been good progress to date. Examples of valuable habitats include raised bogs, blanket bogs, heathland and species rich grasslands. Consultation with Dúchas and IPCC is ongoing and Coillte has proposed an EU-LIFE Programme funding bid for partial funding of restoration of sites identified through this process.

CAR 09 – Deadwood - *While deadwood habitats are in existence in some forests, this is not through any systematic and planned process, and therefore they are at risk from felling or re-structuring operations. Regional and FMU Plans did not adequately address the need to provide deadwood habitats across the estate either geographically (for example small scattered forest blocks) or within forest types (for example high production conifer plantations).*

QUALIFOR Programme	Project Number	6880-ie
FOREST MANAGEMENT SURVEILLANCE REPORT	Company	Coillte Teoranta

The systematic process of building up, protecting and managing deadwood habitats on Coillte land is ongoing. Good progress was seen on one of the clearfell sites visited (Coosane) with the contractor making intelligent use of existing dead wood and leaving or creating opportunities for the future, especially as regards standing deadwood. On another clearfell site there were less opportunities for deadwood, but the contractor showed good understanding of the Forest Service Guidelines. FMU plans still have a generic approach to deadwood without detailed strategies specific to individual FMUs. However, Coillte's current EIA protection and enhancement training manual provides a good appraisal methodology for deadwood and all staff questioned were also aware of the Forestry Service Guidelines. Restock sites visited in the course of this surveillance still showed some lack of consistency in the provision of standing deadwood. Deadwood surveys as seen in the quarterly monitoring reports were seen to be progressing.

Whilst there has been good progress in the close out of this CAR, it remains open because, as may be seen in appendix one, many of the actions instituted by Coillte to close this CAR have yet to be completed.

Comments from surveillance 01

There had been significant work carried out in terms of development and implementation of a methodology to measure deadwood, including training of field staff and revision of the inventory code of practice. Deadwood is now measured as part of the forest inventory and this will provide good baseline data for monitoring deadwood across the Coillte estate. Deadwood is now mentioned within FMU plans. However, this is largely generic and does not provide adequate strategies on how deadwood will be provided within the individual FMUs. Further detail is required which identifies the current deadwood status and details how this will be maintained or additional deadwood habitats will be provided. In the field there is still limited understanding among staff in terms of potential deadwood habitats. There are examples of where managers have identified potential deadwood habitats in the form of mid-coupe retentions (Benbulbin). However this level of understanding and implementation is still not common. It is therefore apparent that further implementation of CAR 09 is required at both the strategic and field levels.

CAR 12 - Chemical Usage – Remains Open - *The standard requires that each FMU has a chemical strategy to effect a reduction in chemical use. Chemical strategies were not complete for all FMUs and did not adequately identify specific means of reducing chemical use. Within some reduction strategies the information provided on chemical use was inadequately detailed.*

This CAR remains open to be reviewed at the next surveillance.

Comments from surveillance 01

In order to address this CAR two working groups were set up – the chemical practice group and the pesticide committee - with the objective of analysing alternatives to chemicals and the impact of low chemical volume application. Establishment managers have received training on pesticide application and non-chemical alternative strategies. On a regional basis, strategies have been prepared which detail previous chemical use, current Coillte 'approved' chemicals, the potential combination of species, land types and pest control issues over the next 5 years, together with specific means to achieve the required rate of chemical reduction within each FMU. Strategies within the West Donegal, East Donegal, Pettigo, Wexford, Blackstairs Mountains and North Mayo FMUs were examined. The main means of chemical reduction are increased use of ground preparation, use of larger planting stock and the introduction of pre-treatment of plants in the nursery, as opposed to spraying on site. This last initiative has been introduced on a trial basis but has already shown dramatic reductions in chemical use. The

QUALIFOR Programme	Project Number	6880-ie
FOREST MANAGEMENT SURVEILLANCE REPORT	Company	Coillte Teoranta

above initiatives are however still at a preliminary stage.

CAR 15 - Management Planning Documentation – Remains Open - *The Standard requires that each actively managed forest should be covered by adequate management planning documentation. Issues are being addressed at Regional and FMU levels. However, adequate plans are not complete for all areas, despite high impact activities such as felling being carried out. In particular, management objectives for social and environmental long term objectives and strategies to deliver these were not adequate.*

Plans for Slieve Felim/Devils Bit, South West Kerry and West Cork were examined during this surveillance and whilst progress was seen (e.g. as regards incorporation of monitoring) the comments made from the previous surveillance still largely stand. Coillte subsequently informed SGS QUALIFOR that all 36 FMUs were covered by plans at the time of the 2nd surveillance. This CAR remains open for checking at next surveillance.

Comments from surveillance 01:

Management planning documentation is now available for all FMUs, and plans have gone through a number of iterations following development of internal guidance and external consultation. The final tranche of FMUs were in draft form at the time of the surveillance visit pending completion of the consultation process. Plans for West Donegal, East Donegal, Pettigo, Wexford, Blackstairs Mountains and North Mayo FMUs were examined during the surveillance visit. The plans provide a good overview of operations. However many plans remain to have the results of biodiversity survey work under CAR 05 incorporated. Additionally, there is a general lack of specificity in relation to the strategic aims of forest management and clear objectives in each FMU. Many of the aims and objectives provided are generic and are identical across a number of FMUs. While there will be some degree of homogeneity, FMU plans must identify the features specific to each FMU and formulate individual plans and programmes to deal with these. This must also include the development of clearly identifiable and measurable objectives and targets related to the strategic aims.

CAR 16 – Monitoring – Remains Open - *The Standard requires that monitoring shall be carried out at an appropriate level. While a wide range of monitoring activities are carried out throughout the Regions, this is generally restricted to forest management and silvicultural activities. Monitoring of social and environmental parameters are less well established, are insufficient to demonstrate compliance with the Standard, and do not always adequately address the particular issues of the FMU.*

Monitoring at both site and FMU level was seen in the course of this surveillance. Examples of site monitoring were seen at Coosane and Welstown and quarterly monitoring reports seen for FMUs 306 and 304. However, FMU monitoring still did not reflect key issues for the area covered. The draft management plan for LISS work at Ballydrehid also did not consider monitoring, consequently this CAR remains open.

Comments from surveillance O1

Monitoring at the operational level has been improved through the use of standard operating procedure monitoring requirements, for example of harvesting plans. These monitoring records are documented and kept in the relevant site files. Examples were seen at Morvagh, Dooish, Benbulbin, and were found to adequately record pertinent issues. FMU plans now also include a monitoring strategy which details key economic, social and environmental monitoring parameters. Examples of data collection against these parameters were seen during the surveillance visit. However the FMU monitoring strategies are largely generic and do not always adequately reflect the specific issues of individual FMUs (see comments, CAR 15, relating to

QUALIFOR Programme	Project Number	6880-ie
FOREST MANAGEMENT SURVEILLANCE REPORT	Company	Coillte Teoranta

identification and setting of specific FMU aims and objectives). Further refinement is required to ensure monitoring requirements adequately reflect each FMUs individual issues.

CAR 17 - High Conservation Value Forest Management – Remains Open - *The standard requires that High Conservation Value Forests (HCVFs) are managed in a manner which will maintain or enhance their attributes. While many of these semi-natural woodlands have individual management planning documents, not all semi-natural woodlands are covered by specific management prescriptions.*

The close out of this CAR is linked to the ecological surveys and old woodland surveys which have yet to be completed, as has a strategy for managing these areas. CAR 17 remains open.

Comments from surveillance 01.

This CAR is closely related to CARs 05 and 18. Through corrective action implemented to address CAR 05 the identification of 'potential biodiversity areas' in all FMUs has identified the location of all broadleaf high forest, mixed high forest and scrub across the Coillte estate. Corrective action addressing CAR 18 has identified the location of 'old' woodlands (areas identified on the 1830s OS maps and continuously covered in semi-natural woodland). This has allowed the programming of the survey of 'old' woodlands. These are given priority in the FMU survey process, which aims to assess the current conservation value, restoration potential and the location of features to be retained and enhanced within 'old' woodlands. This work is scheduled to take place over the next 4 years. Examples of the output from the survey were seen during the surveillance visit. The results of the survey work are then used to develop management prescriptions for these sites.

CAR 18 - Plantations on Semi-natural Woodland Sites - Remains Open - *The standard requires that plantations on former semi-natural woodland sites are managed in a manner that retains and enhances their semi-natural characteristics. While this is being carried out on a limited number of sites, there has been no systematic implementation of this requirement across all regions.*

This CAR, as with CAR 17, is linked to ongoing survey work and is also linked to the Forests Service Native Woodland Scheme, which will provide significant funding. This process is ongoing and hence CAR 18 remains open.

The Forest Service Native Woodland Scheme is also being used to fund the restoration of old woodlands. An example of a proposed site was visited during this surveillance (Bansha Wood). Proposals discussed at the wood included planting with broadleaves, although it was apparent that there was excellent broadleaved regeneration in many areas.

Regarding selection of sites, a strategic approach is being adopted by the company to ensure that applications are not random, but rather directed at addressing the management of semi-natural woodlands of key importance. The creation of riparian woodlands in acid and biologically sensitive rivers is also being planned. An overall project plan for the period of the scheme (2002-2006) is being developed. Appropriate areas identified during the FMU surveys are being included in the scheme. A complete list of all sites amounting to 10,000 ha is being drawn up according to set procedures. Applications are vetted by the Forest Service and Duchas before approval is given, to ensure the suitability of the site. A management plan is then drawn up by an independent ecologist and a forester (both approved by the Forest Service) which is again submitted for consideration by the Forest Service. Depending on the importance of the site, further consultations will take place with Duchas, Fishery Boards etc. before work begins. The checks and balances in the system are such that only sites worthy of inclusion in the Scheme, approved by the competent authorities, will receive funding.

Observation: the way in which Coillte uses the native woodland scheme to restore woodlands

QUALIFOR Programme	Project Number	6880-ie
FOREST MANAGEMENT SURVEILLANCE REPORT	Company	Coillte Teoranta

needs to be monitored at future surveillances to ensure that appropriate measures are being taken to restore individual native woods.

Comments from surveillance 01:

The process for identification, survey and development of management prescriptions for these sites is identical to the corrective action proposed within CAR 17. While the early examples of implementation (Slieve Bloom FMU) are encouraging, the corrective action is similarly at an early stage.

CAR 19 - Species Proportions – Remains Open - *The standard requires that species chosen for plantations are suited to the site and matched to management objectives.*

New requirements for species proportions to be included in the QUALIFOR Ireland Checklist were presented at the opening meeting of this surveillance as detailed below. Coillte expressed concern that firstly they had not been sufficiently consulted and secondly that these new requirements were going to be uneconomic to achieve. Coillte now intend to analyse the potential impact of these new requirements, which will form part of the close out requirements for this CAR.

New requirements

Where at least two species are suited to the site and matched to the objectives:

<65% primary species

>15% secondary species

>20% broadleaves and open space (including at least 15% native broadleaves or open space, where the presumption will be to favour native broadleaves unless alternative management has a higher conservation or biodiversity value, with a minimum of 5% native broadleaves on all sites)

Where only one species is suited to the site and matched to the objectives:

<75% primary species

>25% broadleaves and open space (including at least 15% native broadleaves or open space, where the presumption will be to favour native broadleaves unless alternative management has a higher conservation or biodiversity value, with a minimum of 5% native broadleaves on all sites).

Coillte's strategy to achieve species proportion requirements via the FMU planning process is still not complete and will now require amendment in the light of the new requirements. The whole issue of species proportions is contentious and has attracted stakeholder comment. It is worth noting that stakeholder comment regarding species proportions for the Slieve Felim FMU was based on achieving 20% broadleaves rather than the species proportions required in the QUALIFOR Ireland Checklist. Species proportions planned for 2030 for West Cork FMU were inspected and indicated that the new requirements could be met (assuming the management of open space at 10.5% can be justified for reasons of biodiversity). Namely, primary species 58.9%, secondary species 20.5%, broadleaves 10.1% and open space 10.5%. Current progress against this target was also seen to be recorded on the quarterly FMU monitoring report.

Observation: The issue of species proportions and Coillte's progress towards meeting these requirements must be given a high priority at the next surveillance.

Comments from surveillance 01:

This CAR is closely linked with the corrective action implemented to address CARs 03 and 15,

QUALIFOR Programme	Project Number	6880-ie
FOREST MANAGEMENT SURVEILLANCE REPORT	Company	Coillte Teoranta

work on which is still ongoing and both CARs remain open. While many FMU plans now detail how the minimum species percentages will be achieved, this does not apply to all FMUs. This work is dependent on the restructuring and management planning process.

CAR 20 - Low Impact Silvicultural Systems (LISS) – Remains Open - *While a series of trial Low Impact Silvicultural Systems (LISS) areas has been selected as alternatives to clearfell systems, there has been no integrated appraisal of the potential for or consequences of adopting LISS at local, regional or corporate levels.*

Good progress has been made against this CAR with the LISS group reconfigured. A new detailed examination of potential LISS sites has been undertaken using new guidelines, with some 496 hectares currently selected in a process due for completion in September 2002. Analysis of LISS systems on volume production is currently being undertaken. One LISS site was visited during the audit (Ballydrehid) and its management plan examined. Work already undertaken showed a good understanding of Continuous Cover Forestry (CCF) with the LISS system chosen with both heavy thinning and small coupes used to foster natural regeneration. The management plan, whilst detailing proposed operations, did not indicate how objectives would be monitored. LISS issues should be followed up at the next surveillance and note should be taken of the range of site types (crop age, yield class, location etc) chosen.

Whilst there has been progress, this car could not be closed as the proposed strategy had yet to be completed. Therefore, CAR 20 remains open.

CAR 21 - Biodegradable Lubricants – Remains Open - *While research trials have been carried out and data is still being analysed, there has been no plan developed by Coillte which identifies how biodegradable lubricants will be phased in over time to both Coillte and third party operations.*

Coillte have now timetabled the phasing in of bio-lubricants for both chainsaws (bar and chain lubrication) and harvesting machinery (bio hydraulic oil) - see Action Plan in appendix 1. Good evidence of progress was available. For instance, receipts were inspected for the purchase of bio chainsaw lubricant oil for training programmes, and copies of correspondence with the Irish Forest Contractors Association (IFCA) informing them of Coillte's intention to introduce bio oils were seen. Contractors interviewed on one site (Welstown) were also found to be aware of Coillte's intentions to introduce bio oils. However, despite good progress the majority of Coillte's action plan to close this CAR have yet to be completed. Consequently this CAR remains open.

CAR 22 – Forestry and Water Guidelines – Remains Open – *There is non-compliance with Forestry and Water Quality Guidelines.*

The Farm Partnership (Quinns) and a restock (Coosane) site visited both showed good compliance with water guidelines, with adequate buffer zones and silt traps. In all cases water, where running, was clear. The assessors were also shown an A4 display card graphically illustrating aspects of flow control measures, which was about to be issued to drainage contractors. However on an existing site proposed for aerial fertilisation (Glengoole North) drainage channels were seen discharging into a watercourse - a situation which Coillte staff were aware of. The latter problem, and the fact that the action plans scheduled to close this CAR have yet to be completed, mean that this CAR remains open.

Observation: Verification is required regarding adherence to the Forestry and Water Guidelines concerning the planting of conifers close to watercourses on Farm Partnership Schemes arising from older FPS sites seen in Tipperary. This should be followed up at the next surveillance.

CAR 23 – Overloading - Closed - *Despite requests from Coillte haulage trucks continue to be overloaded, especially in standing sales operations.*

QUALIFOR Programme	Project Number	6880-ie
FOREST MANAGEMENT SURVEILLANCE REPORT	Company	Coillte Teoranta

Coillte have taken decisive action to address the problem of overloading and have largely stopped overloading by hauliers transporting their own timber. Coillte's delivery weights in the month of May to their OSB plant were inspected and only three loads were found to be overweight, and then only by a margin of two tonnes. However, there is still a problem with loads from standing sales, as was evident from lorries leaving a harvesting site visited during the course of this audit (Welstown) and confirmed by an inspection of Coillte's load monitoring from this site.

In order to combat the latter problem Coillte are:

- selecting the top ten gross weights in a month and suspending haulage from timber from the sites identified as well as continuing to invoice the company concerned;
- reserving the right to suspend haulage if roads are damaged and also to recoup the cost of repairs from the haulier.

Evidence was also seen of Coillte's communication regarding overloading and their intended measures to tackle the problem, with all stakeholders concerned.

Observation: The IFCA who represent many hauliers expressed concern that, when Coillte's measures take force, current haulage costs will not be adequate to sustainably transport loads reduced to legal levels.

The success of Coillte's measures to address the issue of overloading of timber lorries will need to be monitored at the next surveillance. However due to the company's proactive measures CAR 23 is closed.

Minor CAR 25 - Consultation – Remains Open - *Inadequate consultation relating to an unusual or high impact operation in County Mayo.*

This CAR raised as a result of a lack of informing and consulting a local community regarding the sale of land for a development project has been dealt with in two ways.

Firstly, there has been an acknowledgement on the part of Coillte that they will not simply rely on the planning process and developer to inform the public as regards the sale and development of Coillte lands by other parties. To this end there is now a new proposed consultation policy through which local interest groups will be informed at the sales negotiation stage and the pre-contract stage. There are also specific procedures related to Coillte's development of its own landholding, depending on size or type of proposal.

Secondly, the local community involved in the Mayo project have been contacted and informed of this policy change and also invited to give their views on this matter. The group have also been given the opportunity to have a meeting concerning the particular sale that affects them.

As this new policy is still in draft form, CAR 25 remains open, subject to verification of its adoption and use, and evidence of stakeholder consultation.

Minor CAR 26 - Hunting - Closed - *Lack of evidence that hunting practices on sites in County Galway comply with legal requirements and relevant Codes of Practice.*

This CAR was based on information from a stakeholder that fox earths had been dug up. Evidence produced by Coillte including results of their own monitoring and correspondence with the stakeholder did not enable the auditors to establish who the perpetrators were, but it appeared unlikely to be the hunt. It was also felt that Coillte had dealt with the problem in an effective way.

From Coillte's written agreement with the hunt clearly marking routes through the forest concerned it also appears unlikely that the hunt do anything but pass over Coillte property, again confirmed by Coillte monitoring.

QUALIFOR Programme	Project Number	6880-ie
FOREST MANAGEMENT SURVEILLANCE REPORT	Company	Coillte Teoranta

Coillte also confirmed that it is their policy not to allow fox hunting on or through their land, except where there are historic rights. Consequently only three hunts use Coillte land.

In order to further address this CAR, Coillte have revised their action plan in appendix 1. The company now proposes to make the licence for the other licensed hunt conditional on not digging up foxes, and also to send out this policy to the Association of Foxhounds for circulation to all hunts.

Confirmation of these actions should be sought at the next surveillance, but in view of the actions taken by Coillte, this CAR 26 is closed.

CARs raised:

One new minor corrective action request was raised:

Minor CAR 27 – Shanbally Edmond Quarry - A quarry on Coillte land did not comply with legislation, as it did not have planning permission. In addition, Coillte had not taken all reasonable measures to stop illegal or unauthorised activity at this quarry, nor had they consulted adequately with local people regarding the impacts of the quarry or mitigated its impacts quickly or decisively.

A site visit was made by one of the assessment team to the quarry at Shanbally Edmond Co. Tipperary, along with representatives from Coillte, including the local manger and a local stakeholder, which confirmed along with documentary evidence the above CAR. A further local stakeholder was contacted by telephone.

Documentary evidence included a letter from the local authority (July 2001) regarding the unauthorised use of the site and a warning notice served on Coillte by the authority (November 7th 2001).

There have been recent attempts by Coillte to regularise the situation, namely application for planning permission and some noise abatement measures - hence this is a minor CAR.

Other issues (including issues raised by stakeholders)

Observation: Timetables for the variety of the actions scheduled to close out CARs needs to be monitored for slippage.

Observation: The use of local contractors needs to be monitored, as there is some stakeholder concern that new methods of tendering for standing timber sales have prejudiced their use.

Observation: The issue of species proportions and Coillte's progress towards meeting these requirements must be given a high priority at the next surveillance.

Observation: Concern was expressed at the adherence to the Forestry and Water Guidelines concerning the planting of conifers close to watercourses on Farm Partnership Schemes. This should be followed up at the next surveillance.

Observation: The stakeholder representing many hauliers expressed concern that, when Coillte's measures take force, current haulage costs will not be adequate to sustainably transport loads reduced to legal levels.

Observation: The way in which Coillte use the native woodland scheme to restore woodlands needs to be monitored at future surveillances to ensure that appropriate measures are being taken to restore individual native woodlands.

QUALIFOR Programme	Project Number	6880-ie
FOREST MANAGEMENT SURVEILLANCE REPORT	Company	Coillte Teoranta

Observation: Concern was expressed by a stakeholder regarding the selection of sites by Coillte for aerial fertilisation. All such sites are submitted to the Fisheries Board for approval. The latter organisation feel that sites submitted by Coillte do not meet the criteria in current Forestry and Aerial Fertilisation Guidelines. Three such sites were visited as part of the surveillance and two did not meet the Guideline's recommendation - namely that appropriate sites should be on "mineral soils which have no cultivation drains". The two sites in question both had drainage channels directly connected to watercourses feeding the local catchment. Coillte's argument that the Fisheries Board in effect "police" this situation is not adequate and they should not be recommending sites for aerial fertilisation in contravention of current guidelines.

Additional Stakeholder issues not covered by CARs/observations

Proposed development of a Woodland Experience amenity scheme along with a communal care centre/retirement unit and a hotel and leisure complex - This issue concerned the proposed project outlined above in a Coillte wood and a local development co-operative. However, this was opposed by a local preservation society. Evidence was shown to the assessors of good ongoing consultation by Coillte concerning this project and active changes regarding access and location to accommodate local concerns.

An additional stakeholder complaint was received concerning risk assessments not being carried out by Coillte's harvesting contractors, and overloaded of timber lorries. As regards the former complaint, risk assessments were inspected on the active harvesting sites visited and found to be in order. The latter issue is addressed in CAR 23.

Assessor's signature:	Date:
<i>Simon Levy</i>	13 August 2002

QUALIFOR Programme	Project Number	6880-ie
FOREST MANAGEMENT SURVEILLANCE REPORT	Company	Coillte Teoranta

APPENDIX 1 ACTION PLANS TO CLOSE OUT CARs

CAR 2 - CONSULTATION

DETAILS OF NON-COMPLIANCE

While consultation is occurring, it is not carried out in a proactive or systematic manner, nor is it implemented equally throughout Coillte. In particular, evidence of adequate, constructive responses to issues raised by the public is not available for all cases.

COMMENTS

The *objective evidence* offered in support of this assessment is:

- High impact operations such as felling and maintenance are ongoing without adequate, proactive consultation.
- Several examples where local communities and other stakeholders have inadequate knowledge of plans, or where they have not been sufficiently involved in the planning process
- Evidence of stakeholders who are unhappy with the level of consultation offered.

Proposed strategy for CAR 2

	Responsibility	TIME FRAME
1. Best practice manual on stakeholder consultation.	Head of Public Affairs. Consultation Practice Group.	Ongoing Revision
2. In regard to FMU plans, implement consultation at FMU or Landscape Unit level appropriate to scale of activities.	Region Managers	Ongoing
3. In regard to high impact operations revise SOP's to include uniform approach to consultation	Process Teams supported by Public Affairs Region Managers to implement SOP's	At next revision
4. Prepare strategy for revision of Social and Environmental consultation panels in light of new structure and expiry of existing panels. Assess the need for a national Social and Environment Panel.	Public Affairs	End September 2002
5. Keep web site updated with current information.	Public Affairs	Ongoing
6. Review issues raised at all consultation meetings to date and formulate policies to address same.	Director, Regions/ Public Affairs.	Ongoing

QUALIFOR Programme FOREST MANAGEMENT SURVEILLANCE REPORT	Project Number Company	6880-ie Coillte Teoranta
---------------------------------------------------------------------------	-----------------------------------------	-------------------------------------------

7. Have elements of consultation strategy into new Customer Relations Management System.	Public Affairs	December 2003
8. Identify training needs at region level and organize relevant courses i.e. Consensus and Conflict Resolution, Participant Involvement at Meetings.	Public Relations (in association with Coillte Training Unit and Regions)	May 2002
9. Develop Corporate Social Responsibility (CSR) strategy for Coillte in association with 'Business in the Community'.	Public Affairs	December 2002
10. Monitor progress in implementing consultation strategy ¹	Public Affairs	Ongoing

¹ Quantitative and qualitative measures are being devised to monitor progress in implementing this strategy as part of our SFM monitoring system

QUALIFOR Programme	Project Number	6880-ie
FOREST MANAGEMENT SURVEILLANCE REPORT	Company	Coillte Teoranta

CAR 3 – RESTRUCTURING

DETAILS OF NON-COMPLIANCE

The standard required that large even-aged forests be restructured. While some restructuring is ongoing this is limited in extent and is not being carried out in a systematic planned manner. Forests are being dealt with in a coupe or piece meal basis rather than as an entire forest as a whole.

COMMENTS

Coillte is committed to restructuring large even aged forests in a systematic planned and phased manner. Each Region has a Landscape Design Team in place and also a steering group at national level to ensure consistency. A long-term strategy (see below) is now in place in each Region, taking into account inter region considerations where necessary.

- Coupe size and re-structuring will be addressed through the Landscape Design Process

Proposed Strategy for CAR 3		
Action	Responsibility	Time Frame
1. Maintain Landscape Working Group (LWG) to drive Action Points 2-5.	John Prior	Ongoing
2. Liase with Species Diversification Group	LWG (John Prior) and Species Project Leader	Ongoing
3. Prioritise blocks for re-structuring ²	Landscape Design Teams	Ongoing
4. Revise guidance documentation for landscape design teams to include: <ul style="list-style-type: none"> • detail of forest plan (25 ha. Plus blocks). • Address issue of integration with biodiversity and other requirements with landscape design plans 	LWG (John Prior)	December 2002
5. Develop and implement re-structuring plans as part of Landscape Design Process	Landscape Design Teams	Ongoing
6. Identify training requirements and put in place relevant courses	John Prior	September 2002
7. Implement further landscape design course	John Prior and Consultant	May 2002
8. Quarterly monitoring and review	Regional Managers	Ongoing

² Business plans will list areas which will be restructured as outlined in the FMU plans on an annual basis

QUALIFOR Programme	Project Number	6880-ie
FOREST MANAGEMENT SURVEILLANCE REPORT	Company	Coillte Teoranta

CAR 5 – BIODIVERSITY FEATURES AND 15%

DETAILS OF NON-COMPLIANCE

May 2000: *Features of biodiversity value are not being protected, and 15% of the forest area is not being managed as conservation areas and long-term retentions. There is no overall strategy to ensure that these requirements are being met, nor are they being implemented under current planning.*

May 2001: *The existing plan of action does not provide a timetable for agreeing broad management strategies and priorities for rare and vulnerable habitats and species. While responsibility for preparing BAPs in Ireland lies with Dúchas The Heritage Service, Coillte should press on with these initiatives and should make a public commitment to preparing BAPs for habitats and species for which it retains significant stewardship.*

COMMENTS

There are four distinct elements to this CAR:

1. Development of an operational system to protect **biodiversity features**. These areas need to be identified, mapped, and protected through the development and implementation of good practice in all aspects of Coillte’s activities.
2. Identification and appropriate **management of 15% of the estate**, where biodiversity enhancement is the primary management objective. These are sites with special biodiversity requirements.
3. Development of a **guideline for forest managers** on habitats and species for which Coillte has special responsibility under nature conservation legislation.
4. Development of **biodiversity action plans** for key habitats and species. This concerns the development of company policy on these habitats and species at national level, by examining what can be done at a practical level on the ground, in sites that are already known to be important for that habitat/species. This element is complementary to the above three elements.

ELEMENT 1 OF CAR 5 – BIODIVERSITY FEATURES		
Action	Responsibility	Time Frame
1. Continue systematic recording and protection of biodiversity features across the estate on operation sites, as per Coillte EIA procedure.	District Managers, Process Team Leaders (Harvesting, Establishment, Engineering)	Ongoing
2. Progress inventory data collection of biodiversity features and data input on VAX.	District Managers	Ongoing
3. Number of biodiversity features recorded per FMU to be checked each quarter as part of FMU monitoring procedure.	District Managers	Ongoing

QUALIFOR Programme	Project Number	6880-ie
FOREST MANAGEMENT SURVEILLANCE REPORT	Company	Coillte Teoranta

4. Data Collection: Progress data collection form with Dúchas The Heritage Service; Progress data collection from other external sources, e.g. NGOs	District Managers and Region Environment Officers	Ongoing
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Element 2 of CAR 5 – 15% of FMU		
Action	Responsibility	Time Frame
1. Progress ecological surveys to identify biodiversity areas and recommend to Region.	Company Ecologist, Region Environment Officers, District Managers	6 further FMUs to be surveyed by December 2002
2. Surveyed FMUs (7 already): Agree biodiversity areas, complete management plans for biodiversity areas, commence implementation of management plans.	Region Manager, District Manager in consultation with relevant staff (e.g. Company Ecologist, Coillte Enterprise)	Agree sites May 2002 Complete plans by Dec. 2002
3. Surveyed FMUs: Develop protocol for development of GIS layer to map agreed biodiversity areas.	Mary O'Brien	April 2002
4. Surveyed FMUs: Develop GIS layer of agreed biodiversity areas and install on Spatial Data Viewer	Region GIS operators, Coillte IT	June 2002
5. Surveyed and Unsurveyed FMUs: Commence implementation of existing management plans and nature conservation actions in known biodiversity areas (e.g. Native Woodland Scheme, LIFE-Nature programme, Coillte Biod. Action Plans)	District Managers	On going

Element 3 of CAR 5 – Habitat and Species Guideline		
Action	Responsibility	Time Frame
1. Engage consultants to compile a guideline for forest managers on habitats and species of nature conservation value that are relevant to forestry.	Company Ecologist	Done ³
2. First draft of guideline to be written.	WM Associates	April 2002

³ In February 2001, WM Associates agreed with Coillte to take on this project. Work on the project was delayed to October 2001, due to prior work commitments by WM Associates. COFORD (The National Council for Forestry Research and Development) agreed to fund the project 50:50 with Coillte.

QUALIFOR Programme	Project Number	6880-ie
FOREST MANAGEMENT SURVEILLANCE REPORT	Company	Coillte Teoranta

4. First draft text to be consulted on with Coillte staff, Dúchas, NGOs, relevant bodies. Second draft to be written.	WM Associates, Company Ecologist	May 2002
3. Finalise text of guideline.	WM Associates, Company Ecologist	June 2002
4. Publish guideline	COFORD/Coillte	2002

Element 4 of CAR 5 – Biodiversity Action Plans		
Action	Responsibility	Time Frame
<p><u>NOTE:</u> Steps 1 - 5, below, outline how BAPs are to be developed for each habitat and species. This is a lengthy process, and so 4 BAPs are planned for completion in 2002.</p> <p>Timescales below refer only to BAPs for:</p> <p>Raised Bogs, Lesser Horseshoe Bat, Hen Harrier, Freshwater Pearl Mussel</p>		
1. Locate EU “priority” and “non-priority” habitats and species on Coillte estate, using Dúchas SAC maps	Company Ecologist and Contractors	July 2002
2. Consult with Dúchas and NGOs on immediate steps to be taken by Coillte for conservation of EU habitats and species. Focus consultations on specific sites and measures to be taken, using maps produced from 2, above.	Company Ecologist and Contractors	September 2002
3. Examine Coillte’s current operational plans for all areas identified in 2, above. Review in the light of nature conservation requirements and determine cost implications.	District Team, Myles MacDonnchadha	Dec. 2002
4. Consult with Dúchas again, to determine which actions should be given priority.	Company Ecologist and Contractors	Dec. 2002
5. Develop management plans to address the conservation, within the Coillte estate, of the habitat/species concerned. These areas will form part of the biodiversity 15% (see Element 2 of CAR 5).	Company Ecologist, contractors and District Team	Dec. 2002

QUALIFOR Programme	Project Number	6880-ie
FOREST MANAGEMENT SURVEILLANCE REPORT	Company	Coillte Teoranta

CAR 7 – GAME BAG RETURNS

Where game species are shot under licences or leases an appraisal of local abundance of target species and the setting of an appropriate cull level was not always being carried out.

DETAILS OF NON-COMPLIANCE

Game management planning documentation and game bag returns not always available in all regions.

COMMENTS

1. Checklist Clause No: 6.B.5
“Unusual game species, other wild birds and animals which are not pests, are only shot when they are locally abundant, and such shooting is at a level that will not affect numbers in successive years. Locally uncommon species are not shot or hunted. (See Wildlife Act, 1976 - Protected Species Listings).”

2. Interpretation of what are “game species”.

Confusion can often exist as to what species are actually defined as “game”. The “game species” referred to in the Wildlife Act 1976 are as follows: -

Game birds: s.24(1) *“The wild birds normally shot as game birds in Ireland are grouse, cock pheasant, partridge, woodcock, snipe, wood pigeon, golden plover, wild duck (including mallard, wigeon, teal etc.) and wild geese (except brent, barnacle or greylag)”*

Game animals: s.25(1) *“In practice, the only species likely to be involved are hares and deer”.*

Note :- Wild deer will be considered separately in the deer management plans

Not all of these species would be typically associated with a woodland habitat and would therefore not be commonly found on Coillte’s estate.

3. Legal protection of “game species”.

All of these “game species” are fully protected by law under the Wildlife Acts 1976, s.24(1) and s.25(1) and subsequent Wildlife act 2000.

4. Determining local abundance and sustainability of game species.

Dúchas the Heritage Service, National Parks and Wildlife under the Minister for the Arts Heritage Gaeltacht and the Islands, have responsibility for determining the abundance and sustainability of the populations of all game species.

QUALIFOR Programme	Project Number	6880-ie
FOREST MANAGEMENT SURVEILLANCE REPORT	Company	Coillte Teoranta

When it is deemed appropriate by Dúchas, the hunting and shooting of these game species is permitted during specified periods under the annual ‘Open Seasons’ order signed by the Minister. The shooting of hen pheasants may also be permitted (where a rearing and releasing programme is in operation) under licence from the Minister (Sec 22(9) of the Wildlife Act 1976 and subsequent Wildlife Act 2000).

Provisions are also made in the Act to suspend these designated open seasons as a result of factors, which may influence the national and local abundance of game species.

s.27 “The Minister may suspend an open season for up to two months for any specified reason (e.g. disease, severe weather conditions etc.). The suspension can apply to the country as a whole or to a particular area or areas and may relate to any species”

5. Restrictions on the quantities of each game species which may be killed

Wildlife Act 1976 s.24(2) “An open seasons order may impose “bag limits” to restrict the number of birds which may be killed by individuals”.

No such restrictions are presently in force.

Proposed Strategy for CAR 7		
Action	Responsibility	Time Frame
<p>1. Establish a pilot scheme for the planning and monitoring of game hunting levels (birds):-</p> <ul style="list-style-type: none"> - Meet and discuss with the NARGC (National Association of Regional Game Councils) to select appropriate FMU for pilot scheme. - Consult with relevant clubs in pilot area explaining rationale behind scheme and obtain commitment of co-operation. - Obtain game bag returns from relevant licensees. - Process bag returns and present to Dúchas 	<p>B.Coad, M.Carey</p> <p>B.Coad and person with responsibility for administering recreational sporting licences in FMU.</p> <p>“</p> <p>“</p>	<p>November 2001</p> <p>March/April 2002</p> <p>Feb/March 2003</p> <p>“</p>
<p>2. Prior to the hunting season each year, to obtain from Dúchas a listing of all game species included in the ‘Open Seasons’ order and to notify all holders of recreational bird hunting licences of its contents.</p> <p>In addition to obtain written confirmation from</p>	<p>B.Coad and all persons with responsibility for administering recreational sporting licences.</p>	<p>August 2002</p> <p>Annually thereafter</p>

QUALIFOR Programme FOREST MANAGEMENT SURVEILLANCE REPORT	Project Number Company	6880-ie Coillte Teoranta
---------------------------------------------------------------------------	-----------------------------------------	-------------------------------------------

<p>Dúchas confirming the current status (abundance) of the relevant species and if local bag limits are in force.</p>		
<p>3. Extend the pilot scheme for the planning and monitoring of game hunting (birds) levels countrywide.</p> <p>Regional (FMU or countryside unit) game* bag returns to be collated and forwarded to Dúchas on an annual basis in order to determine local game population trends and to establish bag limits if required.</p> <p>*Note: - The game species listed on this record sheet will be restricted to those indigenous species which are generally associated with the habitats provided by Coillte's forest estate and which are not subject to artificial "put and take" rearing and releasing programmes.</p>	<p>B.Coad and all persons with responsibility for administering recreational sporting licences.</p>	<p>June 2003</p> <p>Annually thereafter</p>

QUALIFOR Programme	Project Number	6880-ie
FOREST MANAGEMENT SURVEILLANCE REPORT	Company	Coillte Teoranta

CAR 8 - RESTORATION OF VALUABLE HABITATS

DETAILS OF NON-COMPLIANCE

Where habitats have been colonised or planted but still retain valuable ecological characteristics, these should be restored or treated in a manner that does not lead to further loss of value. These areas need to be identified in a systematic manner and management plans written and implemented.

COMMENTS

This CAR refers to the fact that Coillte has not examined the potential to restore habitats that were afforested in the past, and that would be of higher nature conservation value in their pre-plantation state than they are now as forests. Such areas should, therefore, be restored to their former state and could then be included within the biodiversity 15% (CAR 5).

Under CAR 8, we will address restoration of:

- some Old Woodland Sites;
- raised bog, blanket bog, wetland, heathland and species-rich grassland.

To close off this CAR requires close liaison with Dúchas and some NGO's, who already have information on the best sites. Generally, only sites of "top" nature conservation value will be targeted for full-scale restoration – i.e. sites where the former vegetation is still present, and the site ecology is relatively intact. The FMU surveys outlined in CAR 5 are an important aspect of this CAR also, as well as the Old Woodland Survey outlined in CAR 18.

Proposed Strategy for CAR 8			
Action	Responsibility	Time Frame	
1. Progress appropriate restoration of peatlands under the LIFE-Nature Programme. Project Partners: Coillte Teo. & The Irish Peatland Conservation Council. See Project Application.	Tom Kavanagh, LIFE-Nature Project Management Group	Application to EU lodged September 2001	
2. Explore broader options for management of afforested peatlands under COFORD/Coillte research project. Research Project has been approved by COFORD. See Project Application.	Tom Kavanagh, Research Project Management Group	Project Duration: 2002-2006	
3. Pursue funding under Forest Service Native Woodland Scheme for restoration of: wooded riparian zones; woodlands in SACs/NHAs; plantations on former native woodland sites. See Coillte Business Plan for NWS.	Alistair Pfeifer, NWS Project Management Group	Duration of NWS is 2002-2006	
4. Follow up management plans arising from FMU surveys (see CAR 5), where restoration work is	District Teams	Ongoing	

QUALIFOR Programme FOREST MANAGEMENT SURVEILLANCE REPORT	Project Number Company	6880-ie Coillte Teoranta
---------------------------------------------------------------------------	-----------------------------------------	-------------------------------------------

recommended. Implement work plans.

QUALIFOR Programme	Project Number	6880-ie
FOREST MANAGEMENT SURVEILLANCE REPORT	Company	Coillte Teoranta

CAR 9 – DEAD WOOD

DETAILS OF NON-COMPLIANCE

May 2000

While deadwood habitats are in existence in some forests, this is not through any systematic and planned process, and therefore at risk from felling or re-structuring operations. Regional and FMU Plans did not adequately address the need to provide deadwood habitats across the estate either geographically (for example small scattered forest blocks) or within forest types (for example high production conifer plantations).

November 2001

Deadwood is now mentioned within FMU plans, however this is largely generic and does not provide adequate strategies on how deadwood will be provided within the individual FMUs. Further detail is required which identifies the current deadwood status and details how this will be maintained or additional deadwood habitats will be provided. In the field there is still limited understanding among staff in terms of potential deadwood habitats.

COMMENTS

THERE ARE TWO REQUIREMENTS REGARDING THE AMOUNT OF DEAD WOOD HABITAT TO BE RETAINED IN COILLTE FORESTS:

1. Our policy on dead wood is that we will aim to achieve a build-up of dead wood in important habitats (e.g. biodiversity areas, broadleaf high forests, mixed high forests and selected conifer stands), reaching an average density of 3 standing and 3 fallen dead stems (>15cm DBH) per hectare across each FMU.
2. The Forest Service Biodiversity Guidelines state that: “Approximately 2m³/ha of dead wood should be present on the site immediately after each thinning, and approximately 5m³/ha after final harvesting”. This requirement, therefore, concerns forest operations sites only.

CAR 9 – Dead Wood: Staff Training and Awareness		
Action	Responsibility	Time Frame
1. Select training sites in each Region, to show approach to managing dead wood in biodiversity areas and on operations sites.	Mountrath Training Centre, Region Environment Officer, Ted Lynch	July 2002
2. One field day to be held in each Region, to promote awareness of dead wood strategy, in conjunction with other aspects of SFM programme and other CARs.	SFM Certification Task Force	By December 2002

QUALIFOR Programme	Project Number	6880-ie
FOREST MANAGEMENT SURVEILLANCE REPORT	Company	Coillte Teoranta

CAR 9 – Dead Wood: Data Collection, Monitoring, Protection and Management		
Action	Responsibility	Time Frame
1. Check VAX for returns of dead wood counts from Inventory so far, in operations sites and non-operations sites, per FMU.	Ted Lynch	August 2002
2. Estimate extent of <i>Forest Service</i> dead wood in each FMU, i.e. dead wood retained on operations sites – extrapolate from hectares thinned and clear-felled in 2001.	Ted Lynch	August 2002
3. Review data collection process.	Ted Lynch	August 2002
4. Liaise with IT to ensure that Workabout programme continues to function.	Ted Lynch	June 2002
5. Continue protecting and managing dead wood on operations sites, as per Coillte EIA procedure.	Harvesting Team Leaders, Establishment Team Leaders, District Managers	Ongoing

QUALIFOR Programme	Project Number	6880-ie
FOREST MANAGEMENT SURVEILLANCE REPORT	Company	Coillte Teoranta

CAR 12 – CHEMICAL USAGE

DETAILS OF NON-COMPLIANCE

The standard requires that each FMU has a chemical strategy to effect a reduction in chemical use. Chemical strategies were not complete for all FMUs and did not adequately identify specific means of reducing chemical use. Within some reduction strategies the information provided on chemical use was inadequately detailed.

COMMENTS

In achieving a reduction in the use of chemicals in forest areas each FMU will be examined for current usage. Assessments will be made as to where possible reductions can be made or alternative methods used. This approach will aim to minimise the use of chemicals and achieve a meaningful reduction over the average quantities used over the last 5 years. This will be achieved through the application of best practice without entailing excessive cost.

PROPOSED STRATEGY FOR CAR 12		
Action	Responsibility	Time Frame
1. SOP will be reviewed and revised in line with the reduction strategy	Billy White, Jim Dillon, Team Leaders	At next revision
2. Monitor chemical usage in the context of Performance Management review process	Process Head with Team Leaders	6 months From January 2001
3. Continue evaluation of field performance of transplants from the Killygordon treatment facility.	Declan Ward	December 2002
4. Improve quality control in Killygordon treatment plant	Declan Ward	December 2002
5. Scale up output of treatment plant to 4 million plants	Nurseries SBU	December 2002
6. Evaluate and report on the trials investigating alternatives to herbicides (plastic mulches).	Pesticides Committee	December 2002
7. Evaluate and report on the efficacy of Monitor (growth retardant) to control vegetation.	ditto	December 2002

QUALIFOR Programme	Project Number	6880-ie
FOREST MANAGEMENT SURVEILLANCE REPORT	Company	Coillte Teoranta

CAR 15 – FMU PLANS

DETAILS OF NON-COMPLIANCE

The Standard requires that each actively managed forest should be covered by adequate management planning documentation. Issues are being addressed at Regional and FMU levels, however, adequate plans are not complete for all areas despite high impact activities such as felling being carried out. In particular, management objectives for social and environmental long term objectives and strategies to deliver these were not adequate.

COMMENTS

- Existing management planning documentation needs to be expanded and compiled in a overall framework which will deliver SFM and meet the requirements of the Standard. FMU plans have been introduced for this purpose.
- The FMU plans are strategic plans which bring together the economic, environmental and social objectives and targets contained in the separate plans for the FMU such Establishment, Harvesting, Road Construction, Deer Management, Chemical Reduction, Restructuring, various Biodiversity plans, Fire plans etc.
- Draft FMU plans are available for 16 of Coillte's 37 FMUs. Second drafts of these plans will be available at the end of September and will form the basis of consultation with stakeholders.

PROPOSED STRATEGY OF CAR 15		
Action	Responsibility	Time Frame
1. Start process of identifying key features of FMUs in order to formulate programmes to deal with same. (What makes this FMU special?)	District Managers	December 2002
2. Incorporate recommendations from biodiversity surveys into FMU plans as they become available.	District Managers	Commence March 2002 and ongoing
3. Consult with relevant parties on any significant changes in the FMU and on any high impact operations.	District Managers/Team Leaders	Ongoing

QUALIFOR Programme	Project Number	6880-ie
FOREST MANAGEMENT SURVEILLANCE REPORT	Company	Coillte Teoranta

CAR 16 - MONITORING

DETAILS OF NON-COMPLIANCE

The Standard requires that monitoring shall be carried out at an appropriate level. While a wide range of monitoring activities are carried out throughout the Regions, this is generally restricted to forest management and silvicultural activities. Monitoring of social and environmental parameters are less well established, are insufficient to demonstrate compliance with the Standard and do not always adequately address the particular issues of the FMU.

COMMENTS

Comprehensive monitoring of economic parameters is carried out on a continuous basis through the company's MIS. Performance indicators are compiled and reported monthly to the Board. These systems are working well but now need to be expanded to include environmental and social parameters.

To meet the requirements of the Standard two levels of monitoring of environmental and social parameters will take place in the FMUs:

(i) Environmental monitoring of forest operations at site level through the procedures outlined in the SOPs e.g. Harvest Plans, Site Development Plans etc. Details will be kept in site files.

(ii) Monitoring the progress, at FMU level, of environmental and social objectives and targets against planned as detailed below.

Performance reviews of annual programmes take place quarterly as standard management practice within the company. These reviews will now include progress with the economic, environmental and social objectives and targets.

PROPOSED STRATEGY FOR CAR 16

Monitoring of Key Economic, Environment and Social Parameters in FMU

Action	Responsibility	Time Frame
1. Incorporate monitoring of environmental and social parameters into Annual Business Plans	Region Managers, Team Leaders	Ongoing
2. Develop IT Systems to report on environmental and social parameters	Inventory ADT Group	March 2003
3. Review economic parameters quarterly, and environmental and social parameters half yearly or annually where applicable, as part of Performance Management Review Process	Director of Regions/Regional Managers	Ongoing
4. Compile 5-year monitoring report, comparing planned versus actual monitoring for economic, environmental and social parameters. Make report available for public inspection.	District Managers	December 2005
5. Refine monitoring process to include issues specific to individual FMUs.	Region Accountants/Clodag	June 2002

QUALIFOR Programme FOREST MANAGEMENT SURVEILLANCE REPORT	Project Number Company	6880-ie Coillte Teoranta
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QUALIFOR Programme	Project Number	6880-ie
FOREST MANAGEMENT SURVEILLANCE REPORT	Company	Coillte Teoranta

CAR's 17 & 18 – MANAGEMENT OF FORESTS OF NATURE CONSERVATION VALUE

DETAILS OF NON-COMPLIANCE

CAR 17

The standard requires that high conservation value forests are managed in a manner which will maintain or enhance their attributes. While many of these semi-natural woodlands have individual management planning documents, not all semi-natural woodlands are covered by specific management prescriptions.

CAR 18

The standard requires that plantations on former semi-natural woodland sites are managed in a manner that retains and enhances their semi-natural characteristics. While this is being carried out on a limited number of sites, there has been no systematic implementation of this requirement across all regions.

COMMENTS

While forests of “high nature conservation value” are not defined in the auditors comments, we can take it from the Standard that these are:

- native woodlands (any semi-natural stands dominated by native trees and shrubs = oak, ash, birch, alder, hazel, willows, etc. This does not include young commercial plantations of these species).
- forests or woodlands in SACs and NHAs (these can be native or conifer stands)

Coupled with this are “Old Woodland Sites”, which are stands that have been wooded since 1830 A.D., as mapped by William Garrett⁴. The Old Woodland Sites that were planted on former native woodland sites are the most important for CAR 18, i.e. sites that were classified by William Garrett as: BHF (1st Edn.) – BHF (2nd Edn.) – CHF/MHF (3rd Edn.). Many Old Woodland Sites are 19th century plantation forests with little or no specific nature conservation value, and so not all Old Woodland Sites would be classified as “high nature conservation value forests”. Thus, there is a slight difference between CAR’s 17 & 18.

What is required in CAR’s 17 & 18 is a strategy that takes an overview of stands of nature conservation value and develops a programme to manage those sites appropriately, in balance with timber production objectives. That is the aim of the strategy below.

There are close links between CAR’s 17 & 18 and CAR’s 5 (Biodiversity) & 8 (Habitat Restoration). Many of the woodland management plans required under CAR’s 17 & 18 should arise from: the FMU surveys (CAR 5) for those sites that will be in the biodiversity 15%; and from the Forest Service Native Woodland Scheme (CAR 8).

See Strategy Table, overleaf.

⁴ Summary statistics on OWS are presented in a report entitled: *Old Woodland Sites in the Coillte Estate*; William Garrett; November 2001. Accompanying maps are stored on Coillte Spatial Data Viewer

QUALIFOR Programme	Project Number	6880-ie
FOREST MANAGEMENT SURVEILLANCE REPORT	Company	Coillte Teoranta

Proposed Strategy for CAR's 17 & 18		
Action	Responsibility	Time Frame
<p>1. For each FMU, compile statistics (i.e. area of sites, number of sites) on:</p> <ul style="list-style-type: none"> - forests of high nature conservation value (this will require some GIS analysis) - Old Woodland Sites (from William Garrett tables) <p>Total no. of sites = target no. management plans to be completed by 2005.</p>	District Teams	June 2002
<p>2. Develop a strategy for managing:</p> <ul style="list-style-type: none"> - forests of high nature conservation value and - Old Woodland Sites <p>in each FMU, taking into account the nature conservation value of each site and its importance for timber production.</p> <p>Agree targets for: restoration of appropriate sites, i.e. hectares of woodland to be restored by 2005 (linked to Native Woodland Scheme); volume and timing of timber production.</p>	District Teams	September 2002
<p>3. Write strategy into FMU plans</p>	District Teams	September 2002
<p>4. Compile management plans for each site, which should reflect the balance between nature conservation and/or timber production as per FMU strategy. (Management plan template developed for <i>Biodiversity Management Plan</i> can be used, or Forest Service NWS plans.)</p>	District Teams, NWS Project Management Group	All plans completed by 2005

QUALIFOR Programme	Project Number	6880-ie
FOREST MANAGEMENT SURVEILLANCE REPORT	Company	Coillte Teoranta

CAR 19 – SPECIES PROPORTIONS

DETAILS OF NON-COMPLIANCE

The standard requires that species chosen for plantations are suited to the site and matched to management objectives, and comply with the stated minimum percentages. Not all FMUs currently meet the minimum percentage requirements and do not adequately detail how these percentages will be achieved in the future. Additionally, within the selection of species the process is skewed towards consideration of management objectives through the issuance of pre-set targets or limits rather than through an open appraisal which takes due consideration of the capability of the site

COMMENTS

The CAR will be closed off through a combination of

- (a) completion of the FMU planning process
- (b) an appraisal of the results of same, and the 2000 work-plan by the Species Diversification Group, and
- (c) adjustments to the FMU plans in the light of these appraisals following ground-truthing surveys and the restructuring plans (see CAR 3).

Proposed Strategy for CAR 19		
Action	RESPONSIBILITY	Time Frame
1. Continue work of Species Diversification Project group as per project plan	Tim Crowley	Ongoing – December 2002
2. Liaise with Landscape Working Group	Species Project Leader and John Prior	Ongoing
3. Evaluate and ground truth 2001 work-plan and draft 2002-2005 plans on species selection across a selection of FMUs. Determine variance with standard.	Species Project Group	September 2002
4. Adjust species selection process for each FMU for 2002-2005	Establishment Teams	December 2002
5. Ensure work-plan guidelines for 2003 on species selection address variance with standard.	Jim Dillon & Liz Tiernan	June 2002

QUALIFOR Programme	Project Number	6880-ie
FOREST MANAGEMENT SURVEILLANCE REPORT	Company	Coillte Teoranta

CAR 20 – LOW IMPACT SILVICULTURAL SYSTEMS

DETAILS OF NON-COMPLIANCE

While a series of Low Impact Silvicultural Systems (LISS) areas has been selected as alternatives to clearfell systems, there has been no integrated appraisal of the potential for or consequences of adopting LISS at local, regional or corporate levels.

COMMENTS

The Standard requires that “in windfirm conifer plantations lower impact silvicultural systems are to be considered, where they are suited to the site and species present”. While areas of LISS have been established in research plots and pilot areas throughout the country the potential application of LISS in forest planning as still to be realised. CAR 10, raised in the Main Audit, has now been closed and reissued as CAR 20 following the 1st Surveillance Audit. This CAR will be addressed as follows:

Proposed Strategy for CAR 20		
ACTION	Responsibility	Time Frame
1. Reconfigure central facilitation group on LISS to include 2 District Team members per Region to transfer information effectively to local planning level.	John Murphy	February 2002
2. Identify potential sites for LISS in the FMUs, particularly thicket and pre- thinning stages	District Managers	September 2002
3. Determine the impact of LISS on volume production using the new dynamic yield models.	Ted Lynch	June 2002
4. Calculate the financial savings on regeneration costs from sites already established.	Tony O’Keefe and Michael Keane	June 2002
5. Modest target area (500ha) of conifers will be managed under LISS until wider implications can be evaluated.	Director of the Regions District Managers	September 2002
6. Continue training programme for forest managers	John Murphy, Michael Keane	June 2002

QUALIFOR Programme	Project Number	6880-ie
FOREST MANAGEMENT SURVEILLANCE REPORT	Company	Coillte Teoranta

CAR 21 – BIODEGRADABLE LUBRICANTS

DETAILS OF NON-COMPLIANCE

While research trials have been carried out and data is still being analysed there has been no plan developed by Coillte which identifies how biodegradable lubricants will be phased in over time to both Coillte and third party operations.

COMMENTS

The FSC Standard requires that “ biodegradable lubricants are used where suitable in forest machinery and equipment”. As bio oils currently have a very limited use in Ireland there is an immediate need to both raise the awareness of this requirement among forestry contractors and also to promote and introduce their use on a phased basis. This CAR will be addressed through the following actions:

Proposed Strategy for CAR 21		
ACTION	Responsibility	Time Frame
1. The use of bio oils will be promoted through: <ul style="list-style-type: none"> ➤ Encouraging the Forest Service to make bio oils a condition of grant approval in the case of new machines being grant aided. ➤ Notifying machinery agents of Coillte’s plans for bio oils. ➤ Discussing plans with IFCA (Irish Forest Contractors Association) ➤ Communicating company policy and plans for bio oils to Forestry training Schools, sawmills, board mills and their harvesting contractors. ➤ Sourcing best price from suppliers and inform users. 	John Lyons	December 2002
2. Continue to use bio oil in chainsaw training programmes.	Training Centre	On - going
3. New machines purchased by Coillte for harvesting operations will be specified to operate on bio oil.	Head of Harvesting Process and Process Engineer	January 2002 onwards
4. All Coillte owned chainsaws will be operated on bio oil for bar/chain lubrication.	Harvesting Teams	December 2002
5. All contractors working on direct harvesting for Coillte will operate with bio oil for bar/chain lubrication. *	Harvesting Teams	February 2003
6. All harvesting contractors working on Coillte lands will use only bio oil for bar and chain lubrication in both manual and mechanical activities. *	Harvesting Teams	August 2003
7. 25% of harvesting machines will also operate with hydraulic bio oil in their transmission systems.	Harvesting Teams	January 2006
8. 50% of harvesting machines will operate with hydraulic bio oil in their transmission systems.	Harvesting Teams	June 2007

QUALIFOR Programme	Project Number	6880-ie
FOREST MANAGEMENT SURVEILLANCE REPORT	Company	Coillte Teoranta

* Older machines which have combined lubrication system for bar/chain and transmission will be exempt. These will be replaced in time with machines with fully compatible bio oil systems.

QUALIFOR Programme FOREST MANAGEMENT SURVEILLANCE REPORT	Project Number Company	6880-ie Coillte Teoranta
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CAR 22 – WATER GUIDELINES

DETAILS OF NON-COMPLIANCE
Non-compliance with Forestry and Water Quality Guidelines

COMMENTS
Lack of flow control in drains, buffer zones was found to be inadequate

Proposed Strategy for CAR 22		
ACTION	Responsibility	Time Frame
1. Train site managers and supervisors in all Establishment teams on water flow control and buffer zone management (one day course)	Establishment Team Leaders Region Environmental Officers	End May 2002
2. Instruct cultivation contractors on site for requirements in terms of drain layout, silt traps, spacing and other devices to slow water-flow (2 hour instruction period per operator)	Establishment Team Leaders and Site Managers	Start end May 2002 for all current operators – complete October 2002 as jobs commence
3. Prepare A4 size display card for on-site retention by contractors graphically indicating drainage layout, silt trap options to prevent and limit the generation of sediment	Director Forest Establishment, Mick Keane	Display card finalised and distributed by April 15, 2002
4. Monitoring Procedures: (i) Site managers to specifically address water flow control measures and record on EQM form for all establishment sites (ii) Team Leader to specifically address water flow control in routine site audits	Site Managers Establishment Team Leaders	Start immediately and ongoing

QUALIFOR Programme	Project Number	6880-ie
FOREST MANAGEMENT SURVEILLANCE REPORT	Company	Coillte Teoranta

CAR 23 - OVERLOADING

DETAILS OF NON-COMPLIANCE

Despite requests from Coillte, haulage trucks continue to be overloaded, especially in standing sales operations.

COMMENTS

An audit of the weight dockets in Mullingar by SGS auditors showed a high frequency of significant overloading taking place by mill hauliers. This is an on-going problem which the company has been actively pursuing for some time. Overloading by hauliers who transport timber harvested by Coillte has been successfully stopped, however, further work is required to address the issue of haulage of timber from standing sales.

Proposed Strategy for CAR 23		
ACTION	Responsibility	Time Frame
1. Monitor load weights on a monthly basis and ensure compliance by hauliers employed by Coillte.	Harvesting Managers	Ongoing/Monthly
2. Monitor load weights on a monthly basis , implement policy/procedures relating to suspension of haulage from selected sites (SPs) and report developments to the Coillte Forest Management Board.	Pat Hanrahan /A. N. other	Ongoing/Monthly
3. Record incidents of road damage attributable to overloading, implement suspension system and recoup repair costs.	Pat Hanrahan / A.N. Other	Ongoing/Monthly
4. Maintain proactive approach through contact with various representative bodies, (e.g. Forest Service, FITG, ITC, IFCA, ITGA*, Enterprise Ireland and COFORD), to ensure focus remains on resolving the problem on an industry-wide basis.	Gerard Murphy	Ongoing
5. Sign-off and implementation of the Code of Practice for Road Haulage of Round Timber in consultation with the various stakeholders.	Pat Hanrahan	January 2003
6. Completion of: <ul style="list-style-type: none"> ➤ Road Classification Study ➤ Timber Transport Efficiency Study ➤ Tare Weight Study 	Pat Hanrahan/Tom Ryan	January 2003

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- ITC Irish Timber Council
- IFCA Irish Forestry Contractors Association
- IFIC Irish Forest Industry Chain
- ITGA Irish Timber Growers Association
- FITG Forest Industry Transport group

QUALIFOR Programme	Project Number	6880-ie
FOREST MANAGEMENT SURVEILLANCE REPORT	Company	Coillte Teoranta

CAR 24 – COMPLAINT IN CO. GALWAY (KELLYS)

DETAILS OF NON-COMPLIANCE

Lack of evidence of constructive response to a complaint in Co. Galway relating to access.

COMMENTS

Auditor’s comments as follows: “ B and H Kelly were consulted with regard to their outstanding grievances against Coillte. There are a number of issues and progress was being made , but it was concluded that Coillte have made no constructive responses since march 2001. The primary outstanding grievance relates to access”.

Proposed Strategy for CAR 24		
ACTION	Responsibility	Time Frame
Cancelled		

Note: Full background to this issue and all contacts with Kellys have been documented and sent to SGS on the 6th February 2002.

QUALIFOR Programme	Project Number	6880-ie
FOREST MANAGEMENT SURVEILLANCE REPORT	Company	Coillte Teoranta

CAR 25 – CONSULTATION RE. LAND SALE TO ENTERPRISE OIL

DETAILS OF NON-COMPLIANCE
Inadequate consultation relating to an unusual or high impact operation in County Galway

COMMENTS

Auditor’s comments are as follows: “There is a sale of Coillte land in progress for the development of a gas processing plant at Rossport, Co. Mayo. Although the sale is understood to have not yet been concluded, the primary responsibility for consultation has been delegated by Coillte to the developer Enterprise Oil. There is a lack of evidence of an adequate consultation process relating to this situation”.

Proposed Strategy for CAR 25		
ACTION	Responsibility	Time Frame
1. Establish a team to put in place procedures for consultation on high impact developments on Coillte property	Public Relations and Property Development	Team in place*. Report by end of April 2002.
2. Meet with local development group to: <ul style="list-style-type: none"> ➤ Discuss sale of land to Enterprise Energy. ➤ Obtain their views on future requirements for such developments 	Public Relations	April 2002

* Team

- Gerry Egan, Company Secretary and Director, Corporate Services
- Pat O’Sullivan, Property Development Manager
- Thady McTernan, Land Based Business Manager
- Ronan Gordon, Land Based Business manager
- Patricia Flanagan, Stakeholder Consultation.

QUALIFOR Programme	Project Number	6880-ie
FOREST MANAGEMENT SURVEILLANCE REPORT	Company	Coillte Teoranta

CAR 26 – FOX HUNTING IN CO. GALWAY

DETAILS OF NON-COMPLIANCE

Lack of evidence that hunting practices on sites in Co. Galway comply with legal requirements and relevant Codes of Practice.

COMMENTS

Auditor’s comments; “Field inspections of Coillte sites utilised for fox hunting by the Galway blazers hunt were undertaken , in response to a stakeholder complaint about activities of the hunt. Evidence of interference with badger sets was found”.

This CAR was raised without discussions with local Coillte personnel. Subsequent clarification has been provided by the company as to the circumstances surrounding this issue. While considering this CAR as unwarranted the company has offered to take the following action :

Proposed Strategy for CAR 26		
ACTION	Responsibility	Time Frame
1. All hunts which traditionally use Coillte land will be contacted to reaffirm the company’s policy regarding digging out of foxes that have gone to ground and seeking assurance that this practice does not or will not happen in the future.	Public Affairs	March 2002