

FORESTRY AND THE NATIONAL HERITAGE

A REVIEW OF THE HERITAGE COUNCIL'S
FORESTRY POLICY

2nd DRAFT REPORT

David Hickie, free lance consultant
MARCH 2002

INTRODUCTION

The Heritage Council's Policy Paper on Forestry and the National Heritage was published in 1999, three years after the Government's Strategic Plan for the forestry sector (Forest Service, 1996).

The most important changes since 1996 have been stimulated by international policy developments. Currently, the emphasis is on sustainable forestry management, arising from recent international agreements and certification of forest products. The other significant policy changes are to legislation relating to forestry and the introduction of the Native Woodland Scheme. This policy review comprises:

- A. A chronology of relevant developments in the forestry sector since 1999
- B. Responses to each of the Council's recommendations in its 1999 policy paper
- C. A commentary
- D. Some pointers for the future

A. CHRONOLOGY OF RELEVANT DEVELOPMENTS IN FORESTRY SINCE 1999

1997— Ireland signed the Kyoto Protocol ((IUCC, 1998) concerned with reduction in emissions of greenhouse gases. The Government sees opportunities to use forestry as an important contribution to carbon sequestration. The current Minister, Hugh Byrne, T.D., was quoted as stating that he sees conifers as being especially important in this regard.

1998 — Ireland signed up to the third Ministerial Conference on the Protection of Forests in Europe, in Lisbon. This commitment was to be the catalyst for two important policy documents in 2000.

1999 — The Heritage Council launched its policy paper *Forestry and the National Heritage* (Heritage Council, 1999), with a comprehensive list of recommendations.

1999 — The European Court of Justice ruled on 21 September 1999 that the EIA thresholds adopted by Ireland in relation to initial afforestation (70 hectares) exceeded the discretion available to Ireland under the EIA Directive (85/337/EEC) in that they did not take account of the nature, location or cumulative effect of projects below these thresholds.

1999 — Coillte launched its document *Coillte's Forests: A Vital Resource* (Coillte, 1999), a framework for sustainable forest management. It followed

the format set out by the third Ministerial Conference on the Protection of Forests in Europe.

2000 — The Forest Service published its *Code of Best Forest Practice* (Forest Service, 2000a) and the *National Forest Standard* (Forest Service, 2000b). According to the Forest Service, these documents, together with the review of forestry legislation and suite of five *Environmental Guidelines* (Forest Service, 2000c), are the main components of the current strategy for implementing sustainable forest management.

2000 — The *CAP Rural Development Plan 2000-2006* (Ireland, 2000) was launched. The Afforestation Grant Scheme and the Forest Premium Scheme are the two specific measures receiving EU and State assistance, accounting for EURO 374.4 million and EURO 310.9 million respectively.

2000 — The Forest Service increased the broadleaf planting target to 30% of annual planting. In addition, Sitka spruce will amount to 50% and 'diverse conifers' 20% of annual planting respectively.

2001 — The Native Woodland Scheme (Forest Service, 2001) was launched. The scheme, administered by the Forest Service and operating until 2006, aims to restore 15,000 ha of existing native woodlands and to create an additional 15,000 ha of new native woodlands. This is highly significant in policy terms, against a background of neglect of the native woodland resource until now.

2001 — Regulations S.I. 538 and 539 were introduced to facilitate compliance with the European Court of Justice ruling in 1999. The effect of these regulations is that initial afforestation has been taken out of the planning control system, to coincide with the introduction of a new statutory consent system by the Minister for the Marine and Natural Resources. In addition, the mandatory EIA threshold for afforestation is reduced from 70 ha to 50 ha. Provision is also made for the possibility of sub-threshold EIA where a project is likely to have significant effects on the environment.

2001 — Coillte was awarded with environmental certification by the Forest Stewardship Council (FSC), an international body based in Mexico and supported by the World Wide Fund for Nature. The State Forestry Company is thus committed to a series of actions that are aimed at making State forestry more sustainable.

2002 — Currently, the Environmental Protection Agency (EPA) and Coford (National Forest Research Agency) are involved in drawing up a protocol covering the testing procedures for acid sensitive areas. The implications are that planting will not be sanctioned by the Forest Service, or restrictions may apply, in acid sensitive areas. This is a highly significant policy development, even though the evidence of the negative effects of conifer plantations in these areas has been known for more than a decade.

2002 — it is expected that the current review of the Forestry Act 1946 will be completed at some stage in 2002.

2002 — a survey of native woodlands, jointly by the Forest Service and Dúchas, is under way.

B. RESPONSES TO HERITAGE COUNCIL RECOMMENDATIONS IN 1999

The original recommendations are quoted in full from the Heritage Council's 1999 policy paper. They appear in "blue", while the responses are in black.

1. SPECIES AND SITE SUITABILITY

1.1 "Tree species and soil suitability should be more finely matched in future forestry planting"

- "complete the National Soil Survey"
- "provide advice on the correct species to plant based on a site specific assessment"
- "conduct localised trials and breeding programmes with native species"
- "improve the quality and scale of data collected on future plantings, to include species and number planted, spacing, location, etc."
- "target forestry grants to encourage a greater diversity of species mix on better agricultural land"
- "undertake a soil survey evaluation as a prerequisite of new plantings and replantings"

The National Soil Survey has yet to be fully completed. It appears to have slipped down the political agenda. Soil surveys prior to planting are not made as a general rule. Site specific assessment has yet to become accepted practice.

Coford (Council for Forest Research and Development) supports research on native species, including trials and breeding programmes. For example, there is a current project examining Irish birch as a forestry species.

The Forest Inventory and Planning System (FIPS) is currently in development, and Coillte has its own geographical information system. The quality and scale of data collected on future plantings is likely to improve as a result.

"encourage the planting of native species"

The Forest Service's Native Woodland Scheme was launched in November 2001. The Forest Service is providing substantial funds for planting of native species from 2002-2006. The scheme has two main targets: (a) the restoration of 15,000 ha of native woodland, which will involve planting and facilitating natural regeneration; and (b) the creation of 15,000 ha of new native woodland, mainly by planting.

The Woodlands of Ireland group, a partnership between government and non-government organisations, has initiated the Millennium project on native woodlands (totalling 340 ha) in Ireland and Northern Ireland. A total of sixteen sites are being restored or planted by Coillte (14 sites) and the Forest Service Northern Ireland (2 sites), with funding from the National Millennium Committee, Allied Irish Banks and the Forest Service.

Coillte is increasing its planting of native species in its main forestry programme, reflecting the influence of FSC certification, awarded in 2001. The recently introduced Forest Service Biodiversity Guidelines are also encouraging natural regeneration of native species in Coillte forests because of the 15% set aside requirement for forest management units.

1.2 "Diversity of planting should be encouraged at the strategic level"

The species planting targets in the CAP Rural Development Programme, 2000-2006 have changed slightly. The strategic aim is to reduce Stick spruce planting and increase broadleaf planting. The targets for annual average planting by 2006 include:

30% with broadleaf species (native and non-native)

50% with Stick spruce

20% with 'diverse conifer species'

Although the strategic policy has moved towards the Heritage Council's aspirations, broadleaf planting was down substantially from earlier years, at just under 13%. This could fall even further in 2002. The commitments given by Ireland in the CAP Rural Development Plan should be adhered to, and this includes the target annual average planting rate for broadleaves. The Minister should review the current grant structure immediately so that the target is achieved.

1.3 "A strategic planting target should be adopted of 1:1 broad-leaved species to conifer species"

The Forest Service has rejected this recommendation. The strategic policy is now 30% annual planting with broadleaves, to be achieved by 2006, which is a slight improvement from the previous 20%. It is unlikely that this target will be increased during the life of the current CAP Rural Development Programme.

"Planting of mixed species stands should be encouraged in order to retain as much flexibility as possible, for as long as possible, in the utility of the woodland plot"

Mixed species stands are sometimes established in new broadleaf plantations, and where the soil allows a variety of species to thrive.

"The benefits of mixed woodland stands and native species should be promoted"

This is being promoted to a certain extent in the mainstream afforestation programme through the application of the Forest Service Guidelines on Biodiversity and Landscape, and in Coillte as a result of their sustainable forest management approach adopted since 1999.

"The secondary species should be defined to include broadleaved or native species"

"Planting broadleaved and/or mixed stands on more fertile sites should be introduced as a requirement"

This has not been adopted. It is still a matter of choice for the landowner.

1.4 "Planting of broadleaved species should become a strategic policy target for Coillte"

Since it was vested in 1988, most of Coillte's emphasis has been on conifer planting. Since 1999, broadleaf planting has amounted to only 1% of total annual planting. Broadleaf planting will increase to meet the conditions of FSC certification. In this sense, it has become a strategic policy target for Coillte. However, the Forest Management Unit plans (37 in total) published so far indicate that progress towards meeting a 10% broadleaf target could take decades. Coillte's revised policy for its Farm Partnership Scheme is a minimum broadleaf content of 10%, but it is likely that these broadleaves will be felled at the end of the 40 year period.

1.5 "Planting of broadleaved trees, suitable for short rotation cropping, should be promoted under the Farm Partnership Scheme"

There is still a large emphasis on quick-growing conifers on a 40 year rotation.

1.6 "Ireland's forestry policy should encourage the use of local Irish seed"

The use of native seed is being encouraged through the Native Woodland Scheme, but not so much through the other afforestation incentives.

"put greater research and development resources into utilising local native seed as the base for the forestry industry"

Some research is being carried out on Irish birch as a potential forestry species. However, in general, this vision is a long way from being realised.

"introduce higher incentives for native broadleaved species, rather than for all broadleaved species"

Although this has not been adopted in the main afforestation grant schemes, the Native Woodland Scheme will encourage the establishment of a relatively large number of native trees, with a grant equivalent to that for broadleaves other than oak and beech in the main afforestation grant scheme and premiums greater than those for other afforestation, for a maximum of 20 years.

"incorporate native broadleaved trees in all future planting"

This is becoming more of a reality due to the slight shift in overall forestry policy, the suite of Forest Service Guidelines and certification of Coillte.

1.7 "Greater forest stand diversity should be encouraged as part of promoting sustainable forest management"

FSC certification will result in some movement towards greater stand diversity. This is likely to be very limited in the foreseeable future. Coillte is currently undertaking trials of lower impact silvicultural systems on a number of suitable sites of 20-30 ha each. On a national policy level, stand diversity will be promoted in native woodlands, but it will require a greater effort for the idea to become accepted practice in commercial plantations. Progress in this area is more likely to be observed in Coillte properties than in the private sector. Greater stand diversity is likely to be limited by the current very low rate of broadleaf planting. Second and third rotation sites are often more suitable for broadleaved species but foresters are not taking advantage of this opportunity.

1.8 "Substantial research and education effort should be directed at developing broadleaf management and silvicultural skills amongst forestry owners"

Some progress can be reported. Broadleaf management is beginning to be promoted officially, backed up by some research and publications by Coford, and accompanied by articles in farming press. However, it is still at a very low level. Among the NGOs, Crann is the most active in promoting broadleaf silviculture. Crann receives some funding from the Forest Service.

2. BIOLOGICAL DIVERSITY

2.1 "A complete inventory of the remaining areas of semi-natural woodland in Ireland should be undertaken, and their active management and conservation be promoted"

The Forest Service and Dúchas have initiated such a survey very recently. Coillte is currently undertaking its own survey of its 37 Forest Management Units in order to identify areas which might qualify for open space and 'retained habitats' under the Forest Service's Biodiversity Guidelines.

Active management and conservation of semi-natural woodlands is now being promoted mainly through the Native Woodland Scheme, and also to a lesser extent through the Millennium Forests Project, which is managed by Coillte.

2.2 "Sites of high nature conservation value on farmland should not be planted, and landowners should receive sufficient payment to manage these areas for their continued heritage value"

This remains a controversial area. No designated nature sites (NHAs, SACs) are likely to be planted with grant aid. However, sites not so designated remain at risk. Pre-planting surveys will only be required for projects exceeding the new EIA threshold of 50 ha. The new statutory consent system for forestry (introduced in 2001) may improve the screening of afforestation projects. Various bodies that will be consulted under the new system may recommend such surveys, but this will only be tested when the system has become operational. There is no doubt that farmers are identifying for afforestation their worst land from an agricultural viewpoint. This is happening in both Coillte's Farm Partnership Scheme and in the private sector. The land earmarked for forestry is often the best for wildlife. Unless this problem is grasped firmly through national policy, non-designated wildlife habitats will continue to be converted to plantation forestry. This is an issue that should be pursued by the Heritage Council.

2.3 "Current forestry policy should incorporate specific measures targeted at hedgerows to demonstrate their importance as an on-farm resource"

There are no specific Forest Service measures for hedgerows. The Forest Service will support NGOs in relation to hedgerow conservation, and views hedgerows as important components of the landscape. Recommendations for retention of hedgerows are included in the Forest Service's Biodiversity and Landscape Guidelines.

2.4 "Peatland sites where forestry has failed be managed to restore or enhance their nature conservation value"

Coillte is undertaking several experimental projects on peatland sites in the west of Ireland where forestry has failed. Various management options are being explored, including clear felling with no replanting, and clear-felling and allowing natural regeneration. One project is a LIFE/Nature project being undertaken in conjunction with the Irish Peatland Conservation Council, and the other is supported by Coford.

2.5 "A national habitat survey should be undertaken to identify the full range and precise location of Ireland's habitats"

This need has been identified in a previous Heritage Council review of agricultural policy. Such a survey has yet to be undertaken. It is badly needed.

2.6 "Until there is a comprehensive network of sites of nature conservation importance, that a site based assessment of the wildlife value of areas earmarked for forestry development be undertaken"

This remains an unresolved issue, and needs further attention. The main reason it has not been addressed is because introducing ecologists for each site assessment would threaten to slow down the afforestation programme. However, this issue is being addressed in the EPA/Coford forestry and environment research programme. In the meantime, a simple assessment checklist, drawn up by ecologists, could be developed for foresters on the ground.

2.7 "Forestry policy should strike a balance between planting conifers and broadleaved species, to ensure that biological diversity and commercial objectives of the forestry policy can converge"

The Forest Service Guidelines, the Native Woodland Scheme, certification, and the increased official broadleaf planting target of 30% are aimed at contributing towards this objective. However, the situation on the ground may be different. For example, Coillte will be very slow to increase its broadleaf planting rate to even 10% for many of its FMUs, while in 2001, total annual broadleaf planting amounted to just under 13%.

2.8 "Forestry plantations should have a greater mix of species, and should be structurally and spatially more diverse"

- "highlight the importance of tree species selection and management for affecting populations of associated flora and fauna;
- include broadleaved species in plantations
- use local species and provenances for broadleaves
- encourage the growth of an understorey of shrubs by increased light penetration
- leave greater areas of open space within plantations
- encourage the planting of woodland plots with greatest woodland edge
- encourage ride lines that merge gradually with the wooded area;
- provide different age classes of trees
- enhance the habitat range of wooded areas by leaving some mature and dead wood, and increase the number of water courses and ponds;
- promote selective felling rather than clear felling as the dominant harvesting technique"

Species selection is gaining more exposure in the farming press and in forestry circles generally, and this represents some progress, albeit from a very low level. The areas identified above are being addressed to varying degrees by Coillte, following certification, but less so in the private sector. The issues raised above are also being addressed by the requirements in the Forest Service's Biodiversity, Landscape and Harvesting Guidelines. Selective felling of plantations is at the experimental stage in Coillte plots, and forms part of its research into low impact silvicultural systems.

A total of 15% open space and 'retained habitats' / natural regeneration in each forest unit are requirements in the Biodiversity Guidelines. Some mature and deadwood will be left as conditions of these guidelines and as a requirement of certification. The open space requirement may also benefit the conservation of archaeological remains (see 4. below).

2.9 "A special ecological unit should be established to integrate conservation at both the policy and management level of the forestry programme"

An environmental unit, as distinct from an ecological unit, exists in the Forest Service, and this is responsible for the environmental aspects of forestry policy. An ecologist, archaeologist and landscape architect are scheduled for appointment at national level under the Forestry Inspectorate. The above goes part of the way towards meeting the Council's recommendation.

3. HYDROLOGY AND AQUATIC HERITAGE

3.1 "A cautious approach should be taken to planting forestry to avoid negative alterations to freshwater systems and catchments. Also that large scale new planting should only occur in areas where the risks of adverse impacts from afforestation are known to be acceptably low"

This issue has yet to be addressed adequately. Conventional afforestation continues in the upper reaches of river catchments, for example, albeit mitigated by slightly improved practices. Research on forestry and aquatic systems is underway, funded jointly by the EPA and Coford. However, there is already sufficient evidence that the precautionary principle should apply: unless it is reasonably certain that negative impacts on vulnerable aquatic systems can be avoided, then the area should not be planted. The problem is exacerbated by the nature of the forestry being established in sensitive upland areas, where aggressive techniques are practised. The upper reaches of many salmonid rivers in western areas are often not suitable for commercial afforestation as currently practised. However, this should not exclude these areas from low impact, conservation forestry where it is considered appropriate, having consulted with the EPA, the fisheries boards and Dúchas. In continental European countries, conservation forestry is used to conserve soil and protect water resources. There is no reason why conservation forestry could not be used for resource protection in Ireland. This is a subject that deserves further attention.

3.2 "In the revised *Forestry and Fisheries Guidelines* aspects such as in-stream habitat protection, erosion and sedimentation risks should be included"

Erosion and sedimentation risks are mentioned. There appears to be a lack of detail in the section dealing with this, but buffer zones are described in detail for mitigating sedimentation and acidification risks. In-stream habitat protection is not addressed specifically, but is mentioned in relation to construction of roads and bridges, and gravel extraction.

3.4 "A strategic planning system should be developed as the basis for identifying acid sensitive areas"

The Forest Service and the EPA are preparing a protocol for acid sensitive areas at the time of writing, and areas identified will be incorporated into the indicative forestry strategies currently being prepared on a county basis. Acid sensitivity was identified as a major issue for forestry as far back as 1989, but because of the very significant implications for the afforestation programme, action on the ground has focussed on mitigation, by riparian zone management, including the making of buffer zones. It is doubtful if these buffer zones are adequate.

There is concern in the industry that there could be a total ban on planting within the areas designated. This is unlikely to happen for political reasons. The areas likely to be designated as acid sensitive occur in Donegal, Galway, Clare, Kerry, Cork and Wicklow, and correspond roughly with the map on Page 73 of Evaluation of Environmental Designations in Ireland (Hickie, 1997). Acid sensitive areas could cover about 700,000 ha.

4. ARCHAEOLOGICAL HERITAGE

4.1 "A pre-planting field survey is undertaken of all proposed forestry developments in order to identify the presence of any archaeological site"

The revised Archaeology Guidelines stop short of recommending a pre-planting field survey, stating that " local knowledge and careful site inspection can be valuable in identifying areas of possible archaeological importance not previously recorded." Anecdotal evidence indicates that there should be some concern about the procedures currently in place to identify sites before ground preparation and planting is undertaken. This may improve as the education and training input from Dúchas progresses (see 4.6).

4.2 "A full inventory of archaeological sites within forested areas should be undertaken, to assist the development of management plans for their protection"

This may be a somewhat unrealistic aspiration. When sites are discovered, they are added to the Dúchas database, which Coillte uses in its GIS. Thus, every map produced by Coillte includes all the known sites registered by Dúchas. The situation in the private sector is less satisfactory but may improve when an archaeologist is appointed in the Forest Service (see 4.6).

4.3 "An archaeological unit should be established to carry out large scale pre-afforestation surveys"

The Heritage Council is not specific about where this unit should operate. One of the problems with this approach is that often archaeological sites are

discovered only when forestry operations have already begun. In this case, training of forestry personnel is important (see 4.6 below).

4.4 "The concept of archaeological landscapes should be adopted in the context of forestry planning"

This approach has been taken on board in relation to some landscapes units. Examples include North Mayo, Rathcroghan in Co. Roscommon, Cush, Co. Limerick and Slieve Breagh, Co. Meath.

The indicative forestry strategies being developed currently by local authorities and the Forest Service may partially address this issue.

4.5 "There should not be an over reliance on the Record of Monuments for protecting archaeological heritage as this Record identified only a proportion of all archaeological sites"

The RMP is really only an indicator of the presence of sites, and is based on a desk survey. Field work should accompany this to obtain a better picture of the archaeological resource. The revised Guidelines on Archaeology acknowledge that "over-reliance on the RMP can lead to the destruction of unrecorded sites not yet included in the record. It is therefore essential to remember that the data on the RMP are only preliminary and that they are updated continuously as new sites are discovered."

4.6 "There should be closer liaison between forestry and archaeology personnel at all stages in the forestry programme"

- "having an input from professional archaeologists in forestry training and education courses,
- having more direct consultation between archaeologists and foresters during the forestry planning process,
- appointing Regional or Local Authority archaeologists to facilitate assessment of planting proposals and site inspection at local level, and to provide information and advice to landowners,
- encouraging Coillte to participate with Dúchas, the Heritage Service and the National Museum in a management liaison committee, similar to that currently operating with Bórd na Mona"

The Forest Service has begun to address this recommendation partially by appointing an archaeologist in a senior position in the Forestry Inspectorate. The position has yet to be filled at the time of writing. There is now direct input from Dúchas archaeologists into forestry training and education, and there is more direct consultation between archaeologists and foresters during the forestry planning process. Coillte has one full time archaeologist. As the Council knows, Heritage Officers have been appointed to some local authorities, but there are no regional or local authority archaeologists as yet. According to Dúchas, there is regular contact and cooperation with Coillte.

5. ARCHITECTURAL HERITAGE

"Forestry pre-planting surveys and design should be carried out to ensure that forestry does not impact negatively on Ireland's architectural and industrial heritage"

Pre-planting surveys for any aspect of heritage, including architectural heritage, are not yet a requirement.

6. LANDSCAPES

6.1 "Future forestry planting should be done in the context of local strategic planning"

- "actively involve communities in determining the rate of landscape change and afforestation in their areas;
- encourage local involvement in the planning, planting, management and ownership of forestry and related activities"

The new statutory consent system, combined with the adoption of indicative forestry strategies by local authorities in conjunction with the Forest Service, will allow for more public participation in the afforestation programme. It remains to be seen how well this process will work in practice.

6.2 "Negative visual impacts of future forestry plantation should be minimised"

- "undertake a landscape assessment to identify the character of planting in the area, and provide guidance on which species would be most suitable for the new plantation,
- avoid the cumulative planting of private land which will result in a reduction of land traditionally used for agriculture and a change in landscape character,
- ensure that broadleaved plantations are carefully designed to fit with landform and landscape character,
- retain important views and vistas within the landscape,
- avoid planting non-native species above the commons ditch in certain scenic landscapes,
- avoid severe visual impact due to inappropriate planting and clear felling operations"

The recently introduced Harvesting Guidelines and revised Landscape Guidelines respond to some of the points mentioned above.

The cumulative planting of land traditionally used for agriculture is difficult to avoid without strategic planning and even then it will be challenging, because of pressure from farmers themselves and the forestry lobby in general. Already, a compromise has been made between the afforestation programme and the REPS which is not generally in the interests of retention of traditional farmland or nature conservation.

Severe impacts from clear felling will be mitigated due to the new Harvesting Guidelines. This is an area where some progress can be expected in the future.

SOCIO-ECONOMIC ISSUES

7.1 "Sustainable forest management should be adopted as the model for forest management in Ireland"

Sustainable forest management has become the model the Forest Service now uses for forest management in Ireland, as evidenced by its policy statements in the last few years. In practice, the emphasis remains on non-native conifer plantations managed in conventional ways.

7.2 "Local involvement in the planning, planting, management and ownership of forestry and related activities should be encouraged"

Moves towards more local involvement in the above aspects of forestry have been signalled in the draft standard for certification produced by the IFCI. The adoption of indicative forestry strategies involving local authorities and the Forest Service will result in more local participation.

7.3 "Forestry programmes which have a social development theme should be promoted to increase local participation in the forestry industry"

This recommendation is partially addressed by the introduction of the Neighbourwood Scheme, which encourages local participation. The problem is that such participation by local people needs to be sustained in order to create a real partnership with the authorities: it has to be a two way process.

8. REGIONAL AND LOCAL PLANNING

8.1 "Responsibility for regional forestry planning should be shared between the Forest Service and Local Authorities, and all forestry planting should be subject to planning permission"

The new statutory consent system introduced in 2001 means that forestry has been taken out of the formal planning process permanently. Regional planning, in the form of indicative forestry strategies on a county basis and the consultative role of statutory bodies (including the Heritage Council) could result in more emphasis on integrating forestry with other land uses. In effect, local authorities and the Forest Service will share responsibility for strategic planning.

Even if all afforestation proposals were subject to planning permission, without strategic planning it is unlikely that this would have resulted in better forestry planning.

9. LEGISLATION

9.1 "The 1946, 1956 and 1988 Forestry Acts should be reviewed and amended to ensure that the statutory requirements of forestry facilitate the introduction of truly sustainable forestry management"

A review of the 1946 Act is in progress. The main objective is to update the Act in order to reflect recent policy changes. The Council places the emphasis on 'truly sustainable': in the context of what has been set out above, the best that can be said is that the current legislative review represents a move in the

right direction, but truly sustainable forestry is a somewhat distant aspiration for most of the forest estate.

The amended 1946 Act will be an umbrella for all forestry legislation. Some aspects of the 1988 Act governing Coillte will be covered, even though that Act itself is not being reviewed. Details of the amendments are not yet known but are likely to reflect the current international emphasis on sustainable forest management and biodiversity. Other aspects include, for example, that the replanting obligation may be waived in relation to re-planting of acid sensitive areas or areas scheduled for development. At the same time, provisions will be made to ensure that the forest area is not reduced on a piecemeal basis. Nature conservation, including national and EU legal obligations, will be addressed.

C. COMMENTARY

Recent forestry policy changes are evolutionary

The chronology and the issue-by-issue responses to the Council's recommendations of 1999 show that the changes in forestry policy have been evolutionary rather than revolutionary. Mostly, these changes are positive but some will not go far enough to satisfy the Heritage Council's recommendations of 1999.

External influences the stimuli for change

The main stimuli for change have been external, such as the Ministerial Conferences on the Protection of Forests in Europe, pressure arising from international certification for forest products, and legislative and policy pressures from the European Union and the European Court.

1996 Strategic Plan remains intact

The main plank of the 1996 Strategic Plan remains substantially intact. This is the commitment to the 17% forest cover target and achieving a critical mass of timber production (10 million cubic metres per year) for the industry. These targets are dependent on afforestation mainly with fast growing, non-native conifers. National policy changes such as the introduction of Sustainable Forestry Management (SFM) and associated policy documents such as the Code of Best Forest Practice, National Forest Standard and Environmental Guidelines have been introduced to make Irish forestry more environmentally acceptable while at the same time ensuring that the core targets in 1996 Strategic Plan remain intact.

Increase in broadleaf annual planting target not reflected on the ground

Although the annual planting target for Sitka spruce has been lowered to 50% and broadleaves raised to 30% since 2001, figures show that the real rate of broadleaf planting has dropped in the last few years. Increases in the very low annual planting of broadleaves by Coillte are likely to be small and could take decades to reach even the 10% target required by certification. The disappointingly low figures reflect a reluctance at national level to engage in broadleaf forestry on a significant scale, since there is a concern this could endanger the achievement of the aforementioned national targets for the industry. To be fair, there is also a lack of experience in broadleaf forestry that

can only be addressed by embracing practices from abroad and gradually blending them into Irish forestry. As with all new things, this will take time.

Some improvements in policy

There is no doubt that some of the recent policy changes have positive implications for the national heritage. These changes include:

1. Introduction of the Native Woodland Scheme, which appears to be well thought out and ambitious. The aspirations of the scheme may take much longer to be achieved on the ground because of the nature of the work involved and the safeguards built into the scheme. Obstacles to the implementation of the scheme on the ground need to be resolved quickly.
2. FSC certification of Coillte. Despite trenchant criticisms by environmental NGOs, Coillte has made some improvements which, however small, would not have been made without the incentive of certification. I believe that the draft Irish standard for certification is a fudge and is too low. Ideally, Coillte should have made more demonstrable improvements in practice before certification was awarded. However, there are quite a few recent positive developments in Coillte that should interest the Heritage Council.
3. Forest Service Environmental Guidelines. While Fisheries, Landscape and Archaeology guidelines already existed for a decade, the new Biodiversity and Harvesting Guidelines will also result in some positive benefits for the heritage. From the conservation viewpoint, such improvements could have been on a greater scale and the guidelines are designed in such a way so as not to interfere too much with commercial forestry as currently practised.
4. Regional Planning. Forestry has been in need of strategic planning since its expansion in the late 1980s. The move also responds to the Council's 1999 recommendations regarding the need for strategic planning. Regional planning is not yet in place, and will take some time for it to become fully operational. It is too early to say if the consultative mechanisms with stakeholders as part of the new Ministerial consent system will result in significant changes to forestry on the ground. The Council was briefed on regional planning in November 2001.
5. Protocol for acid sensitive areas. Since this is in preparation, its effects are not yet visible, but it should result in reduced conifer afforestation in acid-sensitive areas.
6. According to Dúchas, the situation of forestry planning and archaeology has improved. There is better communication between Dúchas and the Forest Service and Coillte regarding assessment of planting proposals. The rate of outright refusal of planting proposals on archaeological grounds is currently running at 3%. An EIS will be asked for by Dúchas if necessary. There are regular meetings with Coillte. An education programme has been initiated and pre-planting advice is given.

D. POINTERS FOR THE FUTURE

Some aspects which deserve attention are mentioned below:

1. Afforestation of wildlife habitats. This is a serious issue. Biodiversity is being negatively affected by the planting of tree farms on marginal land of wildlife interest. Piecemeal attrition of the natural heritage is occurring and nothing is being done about it. Neither national forestry policy nor national conservation policy addresses this issue. The decision to allow commercial forestry on farms entered in the REPS, and sanctioned by the European Commission, has made the situation even more difficult to resolve. At present, official designation of non-forest habitats appears to be the only means of protecting them from afforestation.

2. Related to point 1 above. The greatest increase in grants in the CAP Rural Development Programme 2000-2006 is for conifers on unenclosed land. The negative implications are clear for undesignated wildlife habitats and for the upper reaches of sensitive water catchments.

3. Since the Council is a statutory body and will be consulted in relation to the new consent system for forestry and in relation to regional forestry planning, it should make every effort to ensure that the issues in points 1 and 2 above are addressed. The issues deserve more attention than can be given in this policy review.

4. Policy for broadleaves — a discussion. The Council's policy on broadleaves reflects its vision for the landscape and biodiversity. However, these are two different objectives. 'Landscape' is highly subjective. I believe that broadleaf woodland contributes to the aesthetic beauty of the landscape because it resembles in texture and colour the natural climax vegetation. However, the old estate woodland and native woodland that grace the countryside are somewhat different to commercial broadleaf plantations. Biodiversity may not necessary be enhanced simply by planting more broadleaves at the expense of conifers, unless these species are grown as part of a low impact silvicultural system. The scientific evidence is not emphatic that broadleaf trees are better intrinsically for nature conservation. A commercial plantation of ash or sycamore and one of Sitka spruce may not be very different in biodiversity terms. Commercial broadleaf forestry — as might be practised in Ireland — would involve a relatively intensive management regime. A new broadleaf plantation can be as uniform and uninteresting as a new conifer plantation, and the rotation length for species with commercial potential, such as sycamore, ash, cherry is similar to that for Douglas Fir and Scots pine (around 60-70 years), while birch and alder can be ready for harvesting at around 40 years.

At the same time, import substitution is an important consideration for economic and global ecological reasons: Ireland should be developing its own hardwood industry so that home-grown hardwood timber can compete successfully with that from abroad. This will take several generations to achieve but must begin now.

5. Low impact silviculture. Ireland's natural and cultural heritage should benefit from low impact silvicultural systems, if and when they become more widely practised. If it is accepted that Ireland should have an economically sustainable timber industry (insofar as this is possible) most timber will come from plantations. In order to maximise the environmental benefits, plantation forestry should be as benign to nature and the cultural heritage as possible,

while also providing economic and social benefits — in other words, moving towards true sustainability. Therefore, in considering revisions for its policy, the Council might consider placing more emphasis on low impact silviculture.

6. Native woodlands and native species. Since Ireland was a deforested country not so long ago, it has a lot of catching up to do in conserving and expanding the native woodland resource. It is important that the momentum of the Native Woodland Scheme is maintained, since it is not as easy to pursue as plantation forestry. There is some feedback from contractors that the scheme will be difficult to implement on the ground. If obstacles to progress appear, these need to be addressed immediately, otherwise the ambitious targets will not be reached.

The emphasis on native species, including native conifers, should remain, as should the vision for a forestry industry where a higher proportion of native species is used.

7. Carbon sequestration. This issue was not addressed in the 1999 policy paper, but is relevant to current policy. The pursuit of carbon sequestration could compromise the vision of a more truly sustainable forestry in the future. Inaccurate and misleading statements have been made by officialdom and politicians about the supposed benefits of Ireland's current forestry policy for carbon sequestration (i.e. meeting the country's commitment to the Kyoto Protocol, see A. Chronology, above). The Heritage Council might choose to play a role in weeding out the bad science and promoting debate that considers all the issues involved. Arguments for using fast-growing conifers in short rotations to 'mop up' excess carbon dioxide probably do not stand up to rigorous scrutiny, especially when ecological sustainability is also considered. This latter point has yet to be emphasised in official statements on the issue. The role of peat soils and agricultural land generally also needs to be considered more carefully. Additionally, there is counter-evidence that close-to-nature forestry, using longer rotations, is more beneficial for achieving carbon sequestration in the longer term.

8. Grants and premiums. Nearly all afforestation is driven by EU/national grants. The species planted, their location and the way that forestry is managed are largely determined by incentives. It follows that if incentives are changed, the nature, scale and location of forestry, especially in the private sector, is likely to change accordingly. There is no reason why the Minister should not revise the grants in order to respond to the current very low level of broadleaf planting, which may even decrease further this year (2002). This view is supported by the commitment given by Ireland to the European Union in the CAP Rural Development Plan to achieve an annual average broadleaf planting rate of 30% by 2006.

9. The Council might consider exploring some projects that could engage the public's support for the Council's vision for the future. This theme could be developed if the Council is interested.

10. The Council should contribute its views to the Mid-term Review of the CAP Rural Development Plan. No doubt this is planned.

11. The Council should press for a fundamental review of the Strategic Plan for the Development of the Forestry Sector, in the light of:

- the current low level of broadleaf planting;
- the afforestation of non-designated wildlife habitats;
- the need to build a viable hardwood timber resource in the long term;
- the political emphasis on fast-growing conifers as carbon sinks;
- the current harsh realities in the industry, such as rising costs, static prices and inefficient industry structure (TIDG, 2001);
- Coillte's narrow economic focus as defined in the Forestry Act, 1988; and
- the conclusions, which remain unanswered, in Peter Clinch's study of Irish forestry economics (Clinch, 1999).

REFERENCES

Clinch, P, 1999. *Economics of Irish Forestry*. COFORD, UCD, Belfield, Dublin 4.

Coillte Teoranta, 1999. *Coillte's Forests: A Vital Resource*. Coillte Teoranta, Leeson Lane, Dublin 2.

Forest Service, 1996. *Growing for the Future: A Strategic Plan for the Development of the Forestry Sector in Ireland*. Department of Agriculture, Food and Forestry. Stationery Office, Dublin.

Forest Service, 2000a. *Code of Best Forest Practice*. Forest Service, Department of Marine and Natural Resources, Leeson Lane, Dublin 2.

Forest Service, 2000b. *Irish National Forest Standard*. Forest Service, Department of Marine and Natural Resources, Leeson Lane, Dublin 2.

Forest Service, 2000c. Guidelines on: *Forestry and Water Quality; Forestry and Archaeology; Forest Harvesting and Environment; Forestry and the Landscape; and Forest Biodiversity*. Series of information booklets. Forest Service, Department of Marine and Natural Resources, Leeson Lane, Dublin 2.

Forest Service, 2001. *Native Woodland Scheme*. Information booklet. Forest Service, Department of the Marine and Natural Resources, Johnstown Castle Estate, Co. Wexford.

Heritage Council, 1999. *Forestry and the National Heritage*. Heritage Council, Kilkenny.

Hickie, D., 1997. *Evaluation of Environmental Designations in Ireland*. Heritage Council. Kilkenny.

IUCC (Information Unit on Climate Change), 1998. *The Kyoto Protocol to the Convention on Climate Change*. United Nations Environment Programme, Geneva.

Timber Industry Development Group (2001). Report to the Minister for Enterprise.