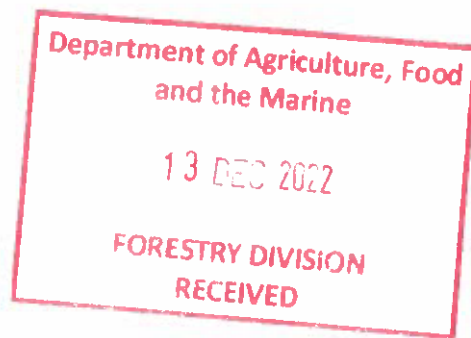



6th December 2022



Forestry Plan 2022

Dear Sir / Madam,

Please find enclosed some comments on the above Submission as I realise some days late due to unforeseen circumstances . However I hope you will see them as relevant for consideration.

Yours faithfully

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CONTEXT- GENERAL VIEWS

Given the urgency to expand the forest estate the plan is comprehensive and extensive in terms of strategic areas of focus and would certainly fall within the UN sustainable goals, through the forestry and non forestry programmes. Goals are clear. If anything the great detail encompassed within the plan may risk over centralised micro management which may lead to lack of flexibility. While bringing guideline up to date the use of a code of practice for the sector, not referred to here was a useful tool use in previous programmes. The requirement for a Forestry (and Wood) board, referred to by many stakeholders is still considered in a very speculative way. This could draw the many strands and interests involved in the sector together and help in they key driver of promotion. The cascade of rules and regulations which the media suggest is inhibiting to any programme needs to be simplified or at least presented in a problem solving way.. There are measures or elements within the programmes which may have unintended consequences which need very careful and well informed consideration before adoption. Instances are rewinding, involving non management and the risk of invasive species or the classification of a potential resource (land) on a redundant basis e.g. 'unenclosed' to forego its use.

COMMENTS ON STRATEGIC PLAN

A brief commentary on the range of objectives , measures and interventions is offered. As there are many cross references I try to avoid duplication here possible so if a issue comes up in a measure it may not be referred to inn an intervention.

ENABLING CHANGE. A Board is not included in the new structures.

COMMUNICATIONS. Well covered

LAND AVAILABILITY. No reference to comprehensive data bases already available. D we need yet another land use survey

SUPPORT AND PROMOTION. Refer back to Forestry Board

INCENTIVES – FOREST CREATION AND MANAGEMENT. SFM now intrinsic to all forestry. Change as optional is not always to be preferred.

SFM. This was the basis for the Code of Best Practice and is in use elsewhere. Once accepted SFM need not be appended to every measure

HEALTH. Constant vigilance and research are the requirements

EDUCATION. Possibly funding University postts

RESEARCH. The nature of a long term research facility, structure and staffing needs elaboration

CLIMATE. Priorities must be recognised. Greenhouse gasses are the most immediate and urgent problem.

CARBON. See above . New forests the key .18K needed. There must be an aspiration to increase over 8 k , 5 k of of high forest focussed only on the immediate problem.

EMBODIED CARBON. New emphasis on non fossil materials welcome.

FORESTS FOR WOOD. Maintenance of production forest to avoid a wood supply/carbon storage cliff essential.

PROMOTION Dealt with above

MARKET DEVELOPMENT. As above. Markets for new products Many and varied, eg Large logs, food, new building materials etc) to be found.

QA. Does the NSAI come in here also

NATURE. This extends beyond native species. Role of naturalised specie to be rethought as a replacement for ash and elm. Also non invasive non native in combination with native.

HERITAGE etc.. Recognition of riparian woods to be welcomed. Species selection for BNM cutaway should include for a timber and carbon return.

BIODIVERSITY. The tenor of the plan suggests there is no biodiversity apart from native woodlands. All forests support biodiversity to a greater extent than agriculture and indeed many of our more impoverished non forest habitats. This should be examined and supported. Examples are roadsides, rides, margins, tracks and open spaces. The National inventory shows examples of this. Biodiversity must be balanced against the other important strategic needs

ANCIENT WOODLANDS. Preservation to be welcomed. Should include examples of old estate woodlands , not necessarily of native species

Governance, monitoring and reviews of plan progress includes DAFM at a high level and stakeholders committees This should be inclusive of all interests. Again a Board would be a useful additional voice. A large number of reports and guidelines are listed for review . But the Code of Practice is excluded. This would be unfortunate. An annual Report on Forestry directed at the public would also be helpful

COMMENTS ON FORESTRY PROGRAMMES

These require 11 measures requiring 7 actions analysed by SWOT analysis and refined into 3 needs 1). increased forest cover, 2). increased socio /environmental action and 3.) increased mobility- as well as some additional partly addressed needs, dealing with the licencing system creating, a vision for forestry and aligning the forestry programme with CAP. Actions addressing these needs had to contribute to specific objectives set out in an EU Regulation (6). This breakdown is rather complex to the average reader but seems to be required by regulation though most of the funding is national. However the programme satisfying these needs and objectives can in the end be defined by a programme of 8 interventions each comprising a number of measures Accepting the fact that the programme is of necessity detailed and covers a wide range of actions comments are confined to issues of importance that may , within a number of interventions, emerge.

These comments refer only to the Strategic plan and forestry programme only and , not to the Native Tree Area Scheme

FOREST CREATION -3 measures

The breakdown of forestry schemes into 12 categories is valuable in that it covers nearly all conditions to be met in this country however a balance needs to be maintained between production forestry and the many alternatives. With a target of 8 k planting pa when the less or non productive forests are stripped out leaves 5 k ha left for wood and carbon storage. This is a long way from the 16-18 k deemed essential for carbon neutrality by mid century There should be flexibility to take up on other schemes should they be not fully subscribed or an option to increase the target should circumstance warrant.

It is not clear if financing would be available through a NH3 premium scheme for land removed from cattle grazing (on top of other premiums.). This could be quite effective.

A short sentence removing grants from what were formerly 'unenclosed' lands belies what could be a very negative impact. There are 80 k ha of lands which were classified in this way but are productive for forestry and are unencumbered by environmental constraints or designations. This has the potential to reduce the available land by an annual 10 year programme surely an unintended consequence. A site forest productivity classification is available to confirm planting suitability.

A monitor will be needed to track deforestation through re wilding or other uses to ensure against wood cliff being reached whereby sinks become sources and wood supply tails off as the high planting of the 90s is removed.

This intervention is governed by a plethora of regulations , guidelines and qualifications including EIAs for larger plantings Regulations introduced here should reflect broad EU policy to increase forest. The management of this must be dealt with in a user friendly and effective way.

Most of the other forest types other than high forest are important components of multi use forestry and are desirable but by their nature require less regulation are dealt with are encouraged through generous grants and transfer is facilitated.

Other measures include a woodland environmental fund which would probably be encompassed within the 12 categories ,and a BNM cutaway intervention which might add to addressing the carbon balance. This would require good native stock of perhaps SP, alder ,birch and oak. It would at least be more effective than re wetting, which requires a profile of many hundreds of years on stripped site where NH3 has long been released.

AGRO FORESTRY – 3 measures

these are new schemes on a modest scale worth developing but as yet largely untried. Some protection may be needed in areas prone to deer intrusion..Forest Gardens is an interesting concept Obviously it cant be confined only to native species.

INFRASTRUCTURE - 9 measures

Mainly roading and machinery,activities on an industrial scale requiring considerable planning .Machinery and technology granted on a relatively modest scale. Nursery support comes with this intervention. As nurseries require forward planning the efficient processing of planting licences and reforestation procedures will be critical. Forestry technology and premiums for conservation,CCF ,seed stands and environmental enhancement also come under this head mitigating some additional costs to growers and managers..here these impact on conventional management should be recorded

SFM-8 measures,

Schemes for forest owners to ,manage sustainably; Woodland Improvement, CCT,coppice,seed stands,tree protection,conservation and native spp management. Well covered .Shaping and pruning omitted

SKILLS FOR SFM – 5 measures

Knowledge transfer,training ,promotion ,and continuous development. It should be noted that SFM represents part of all forestry education, and professionals and contractors are well aware of the elements involved. Dealing with invasive species represents recognition of this threat especially rhododendron ponticum..The lack of timely and effective action by bodies such as NPWS and the parent Department of which Forestry Division is part implies that they too should now be deeply involved in controls.

OPEN FORESTS -4 measures

Education,access,facilities,activities , promotion, health. Widely covered but again a forestry board would make this intervention more effective.

CLIMATE RESILIANCE REFORESTATION -3 measures.

For CCF,native forests ,water. These are admirable but not the only measures to increase resilience in the light of climate change. More diverse conifers and braodleavesin high forests will involve predictive weather and site research and pilot trials for reforestation deisions to be taken.

RECONSTITUTION – 2 measures

Genral damage from natural causes and ash die back including removal of host species. This may be a continuous changing situation related to the movement of pests world wide . On a broader level it will come under protection measure ,each event requiring its own measures. Some modelling ,say under research support based on international (specifically European)experience will be advisable to evaluate remedial measures.