

The Department of Agriculture, Food, and the Marine (DAFM)

Ireland's Forest Strategy Implementation Plan

SEA Statement

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1. Introduction

1.1 The Purpose of the SEA Statement

This Statement forms part of the Strategic Environmental Assessment (SEA) of the adopted Ireland's Forest Strategy Implementation Plan (IFSIP) for the period 2023-2030. SEA is a systematic, on-going process for evaluating (at the earliest possible stage) the quantity and consequences of implementing certain plans and programmes on the environment. This SEA Statement is the final stage of the SEA process, and it is required under the European Communities Regulations 2004¹ (EU SEA Regulations) and national legislation² (SEA Regulations).

The purpose of the SEA Statement is to provide information on the decision-making process, and to document environmental considerations, the views of stakeholders and outline how recommendations arising from the SEA have been taken into account in the Plan. The four key requirements of this SEA Statement are to highlight:

- The incorporation of environmental considerations;
- Stakeholder involvement;
- Alterations considered; and
- Monitoring.

The SEA Statement is chronological in nature and includes the following:

- An outline of the methodology for undertaking a SEA;
- Scoping - an overview of the scoping process and summary of how the submissions received from stakeholders have been taken into account;
- Environmental Assessment - description of how environmental considerations have been integrated into the SEA;
- Alternatives - an outline of the reasons for choosing the plan to be adopted, in light of the other reasonable alternatives considered;
- Monitoring - an overview of the measures to monitor the plan going forward; and
- Final Appraisal - evaluation of the effectiveness of the SEA.

This SEA Statement will accompany the adopted IFSIP and be made available to the public.

1.2 Ireland's Forest Strategy Implementation Plan (IFSIP) 2023-2030

Project Woodland, established by the Department of Agriculture, Food and Marine (referred to hereafter as DAFM) has prepared Ireland's Forest Strategy Implementation Plan 2023-2030 (referred to hereafter as 'the IFSIP'). The IFSIP provides details on the implementation means of achieving the overarching strategy objectives contained in Ireland's Forest Strategy, to meet the immediate to short term needs for the period of 2023-2030.

¹ European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations, as amended by European Communities (Environmental Assessment of Certain Plans and Programmes) (Amendment) Regulations 2004

² Planning and Development (Strategic Environmental Assessment) Regulations, as amended by the Planning and Development (Strategic Environmental Assessment) (Amendment) Regulations

The overarching objectives in the IFS are rooted in the three pillars of sustainability - People, Planet and Prosperity. These pillars guide the strategic objectives in the IFS and aim to make Ireland's ambitious shared national vision for forestry a reality.

The shared national vision for forestry, as developed by Project Woodland, following an extensive consultation process with stakeholders and citizens in general looks for significant change until 2050. The vision for the role of forests, and trees in Ireland's future, is built around the principle of the right trees in the right places for the right reasons with the right management. The shared national vision anticipates by 2050 that Ireland's forests will be a cornerstone in an inclusive and sustainable rural economy while assisting in achieving climate and biodiversity goals. In addition, it is seen as being a major contributor to people's health and well-being.

The IFS, which will cover the period between now and 2030, is the first of its kind and is designed to provide an overarching framework to identify the actions needed to implement the change required in order to achieve this ambitious shared national vision. The proposed IFS is defined by DAFM as *outlining the main objectives and goals for forestry in the medium and long-term*. The IFSIP will function as the enabler 'Implementation Plan' to the higher-level IFS and overarching shared national vision.

The IFSIP will do so, by the inclusion of a detailed Forest Action Plan (referred to hereafter as FAP) and a Forestry Programme (referred to hereafter as FP) for the period 2023 – 2027. The IFSIP's detailed Forest Action Plan, includes the Actions for each of the Enablers and Value Area Goals of the IFS, which are broken down by indicative timeframes, leads, key stakeholders and by what means the Action will be implemented. A significant proportion of these Actions will be implemented through the next FP for the period 2023 – 2027. The FP will be the primary means by which the Vision and the Strategy are delivered in the immediate to short term. The FP was created in alignment with the IFS and as such, contains a list of definitive Measures and Interventions as its main delivery mechanism. All of the Measures and Interventions supported in the FP have the principles of Sustainable Forest Management at their core. Overall, the IFSIP sets out how Ireland's ambitions to expand its forests will be achieved and how to increase its role in helping address the climate and biodiversity objectives at both National and EU level can be realised.

The over-riding objective between now and 2030 forestry in Ireland is to radically and urgently expand the national forest estate on both public and private land in a manner that will deliver lasting benefits for climate change, biodiversity, wood production, economic development, employment and quality of life. This will be a challenge of significant proportions, which will require a whole of society and the whole of government response if it is to succeed. The IFS is designed to make this happen and this IFSIP describes the Actions to deliver the Strategy accordingly. The IFSIP represents a comprehensive, ambitious, and long-term plan to protect and enhance Ireland's Forests, as Ireland is fully committed to realizing the important role that forests and the forest-based sector must play in the transition to a sustainable, green, climate neutral and competitive circular bioeconomy.

The Plan area with which the IFSIP will concern is displayed in Figure 1. The relationship between the Shared National Vision, Ireland's Forest Strategy, Ireland's Forest Strategy Implementation Plan and the Forest Action Plan is outlined in Figure 2.

The IFSIP outlines DAFM's aims and commitments with regards environmental protection; including general, human health, biodiversity, climate change, air, and water quality, land and soil, landscape and visuals, heritage, and material assets, as they relate to forestry by means of the IFSIP's Interventions, Measures and Actions.



Figure 1.1 IFSIP Plan Area

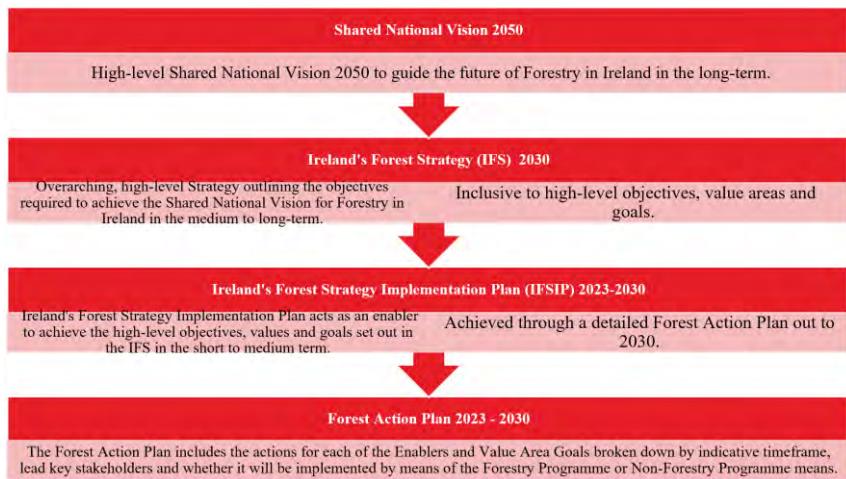


Figure 1.2 Relationship between the Shared National Vision for Forestry, IFS and IFSIP

1.3 Timing of the SEA

The preparation of the IFSIP and SEA process were carried out in parallel to ensure that environmental considerations were taken into account into the plan making process.

The timeline for these steps is set out in Table 1.1.

Table 1.1 Timeline of the IFSIP and SEA iterative process

Implementation Plan for the Forest Strategy 2023-2030	SEA
Commencement of preparation of IFSIP	Commencement of review and SEA Scoping Process: 14 th February 2022 Preparation of SEA Scoping Report and commencement of SEA Scoping Consultation: 11 th July 2022
Preparation of IFSIP	Preparation of SEA Environmental Report: 18 th April 2022 and; Natura Impact Statement: 23 rd May 2022
Commencement of consultation on IFSIP, SEA Environmental Report and Natura Impact Statement: 19 th October - 29 th November 2022	
Consideration of submissions received on the IFSIP, SEA Environmental Report and Natura Impact Statement and update of documents Preparation of the SEA Statement: 14 th November 2022	
	Determination by DAFM of Requirement for SEA/AA in accordance with S 12 of the Planning & Development Act
Publication of IFSIP and SEA Statement: January/ February 2023	

Section 4 of this SEA Statement provides a description as to how environmental considerations were incorporated into the plan making process.

2. SEA Methodology

2.1 Overview

This section highlights how the SEA was undertaken for the IFSIP. The SEA methodology is based on legislative requirements and relevant Environmental Protection Agency (EPA) guidance and will ensure compliance with the SEA Directive and associated legislation. The EPA's SEA Pack (Version 18/02/2020) was also used as a source of information during the scoping process.

The IFSIP (DAFM), the SEA Environmental Report and the Appropriate Assessment (Arup) were prepared in an iterative manner whereby multiple revisions of each document were prepared, each informing subsequent iterations of the others. To facilitate this iterative approach, numerous discussions were held between DAFM and Arup. The key stages outlined in Figure 2.1 were identified and are discussed in the following sections.

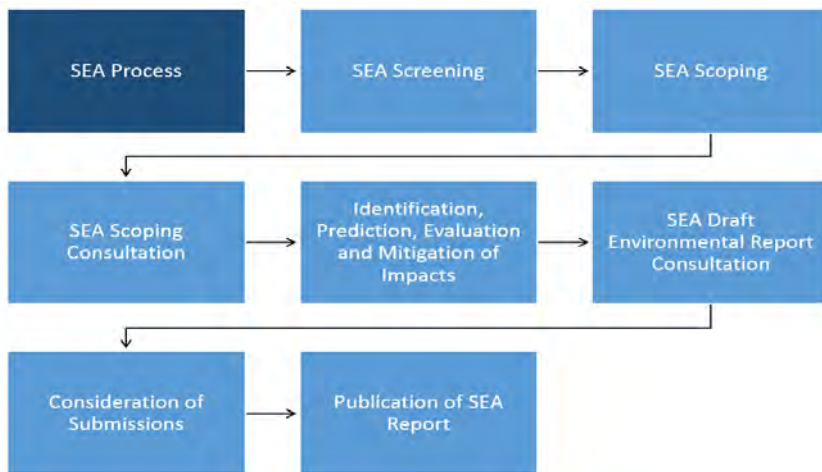


Figure 2.1 Key Stages of the SEA Process

2.2 Screening

Screening is the process for deciding whether a particular plan would warrant SEA. A screening assessment was undertaken as part of this SEA process to determine if the IFSIP required a SEA. Following this assessment, it was concluded that the IFSIP falls within the requirements of the SEA Directive in that:

- The IFSIP is subject to preparation and adoption by a National Authority;
- The IFSIP is required by legislative, regulatory or administrative provisions;
- The sole purpose of the IFSIP is not to serve national defence or civil emergency nor is it a financial/budget Plan or co-financed by the current Structural Funds/Regional Development Funds Programme;
- The IFSIP is prepared for the forestry sector;
- The IFSIP is considered to have the potential to set a framework for development consent for projects listed in the EIA Directive; and
- The IFSIP is a national level plan which is not restricted to the use of small areas at a local scale only, nor is it a modification of a Plan/Policy.

2.3 Scoping

2.3.1 Scoping Process

Scoping is the process for establishing the range of environmental issues to be covered in the SEA and the level of detail that the assessment will investigate. Scoping also allows input from the environmental authorities and stakeholders to be incorporated. Essentially, responses submitted as part of the scoping process provide greater focus on the evolution of the adopted IFSIP.

The considerations addressed during the scoping process for the IFSIP are as follows:

- The key elements of the IFSIP to be assessed;
- The environmental aspects to be assessed as part of the SEA;
- Identification of relevant international, national and local plans, objectives and environmental standards that may influence or impact on the IFSIP;
- Development of Environmental Objectives, Indicators and Targets to allow the evaluation of impacts as part of the SEA; and
- Identification of any reasonable alternative means or scenarios for achieving the strategic goals of the IFSIP.

The SEA Scoping was a key part of the assessment process as it set out the extent of the SEA and provided information to allow consultation with defined statutory bodies and environmental authorities on the scope and level of detail to be considered and incorporated at an early stage in the assessment.

2.3.2 Scoping Consultation

Draft one of the SEA Scoping Report was issued on the 21st of March for client review (DAFM), Draft two of the SEA Scoping Report was again issued for client review on the 23rd of May. The Scoping Report was then issued for review and comment by defined statutory bodies and environmental authorities. The statutory consultees were given a period of four weeks to respond with any observations or submissions on the content of the SEA Scoping Report.

The Scoping Report summarised the key environmental issues and outlined relevant plans and programmes that were likely to affect or be affected by the IFSIP.

This information was then used to set out a series of SEA Objectives, Indicators, and associated Targets. The Objectives and Targets established aims and thresholds which would be taken into consideration to effectively assess the impact of the IFSIP on the environment. Indicators are used to track the achievements of Objectives and Targets, describe the baseline situation, monitor the impact on the environment and predict impacts.

2.3.3 Scoping Responses

Two No. submissions were received in response to the SEA Scoping Report, from the Environmental Protection Agency (EPA) and the Department of the Environment, Climate and Communications. All comments, observations and submissions contained therein were considered and incorporated into the assessment process, as considered relevant. **Appendix B** of this report contains a summary of the submissions received on the SEA Scoping Report, and how they were responded to.

The SEA Directive requires that where the IFSIP has potential for transboundary environmental effects these must be addressed within the SEA. In accordance with SEA Directive and EPA Guidance, the relevant statutory consultee in Northern Ireland was also contacted during the Scoping consultation period as listed on the EPA Contacts Section of the EPA website: <https://www.epa.ie/our-services/monitoring--assessment/assessment/strategic-environmental-assessment/sea-contacts/>.

The SEA Scoping Report was emailed to the SEA Team, Department of Agriculture, Environment and Rural Affairs, Klondyke Building, Cromac Avenue, Lower Ormeau Road, Belfast BT7 2GA at: SEATeam@daera-ni.gov.uk. However, no responses were received.

Once scoping was complete, the project team (including the SEA and AA teams and DAFM) worked together to identify and resolve issues and mitigate potential impacts.

The matrix led assessment basis of the SEA provided a holistic, integrated and iterative approach to the development of the Intervention, Measures and Actions in the IFSIP. To this effect, the two processes were seamless and facilitated necessary amendments to accommodate the mitigation of environmental impacts.

2.4 Baseline Assessment

Gathering relevant information that describes the current environment within the IFSIP area is an integral part of the SEA process. The SEA Directive requires that certain information on the existing environment is presented to help assess the implementation of the IFSIP, as well as helping establish how the environment would change if the IFSIP is not implemented.

Baseline information has been collected from readily available sources, and a Geographical Information System (GIS) was used to graphically present and analyse relevant information. The baseline of the Plan area, i.e., the area to which the adopted IFSIP applies, is reported in Section 5 of the Environmental Report ('Current State of the Environment'). The findings of the 2020 State of the Environment Report (EPA, 2020) were integrated into the SEA Environmental Report, amongst a large amount of forestry documentation, including but not limited to, Forests, products, and people Ireland's forest policy – a renewed vision (DAFM, 2014) and Forestry Statistics 2021 (DAFM, 2021).

2.5 Environmental Assessment

2.5.1 Overview

The environmental assessment ran in parallel to the development of the adopted IFSIP. The environmental assessment process was undertaken in accordance with best practice SEA principals and guidance.

The environmental assessment comprised a review of the baseline data, identification of likely impacts and development of appropriate mitigation measures for the IFSIP.

An appraisal matrix was developed to facilitate the assessment of the Interventions, Measures and Actions outlined in the adopted IFSIP and its material alterations.

The matrix led assessment provided a holistic, integrated, and interactive approach to the formation of the Interventions, Measures and in the adopted IFSIP. The assessment also considered the findings of the AA.

A number of iterations of this assessment matrix were undertaken, between the SEA Team and DAFM - refer to **Section 2.5.4 - 2.5.5**.

2.5.2 Objectives, Indicators and Targets

The objectives, indicators and targets are the aspects for which the IFSIP is assessed against. The Interventions, Measures, Actions, and recommendations in the IFSIP are assessed against a range of environmental objectives and targets established for the purpose of the SEA. Further, indicators that are recommended in the SEA are utilised over the lifetime of the IFSIP to quantify the level of impact that the proposed plan may have on the environment.

A range of SEA Objectives, Indicators and Targets were recorded in the SEA ER which went out for public consultation on 19th October 2022. Following review of submissions, some updates were made to the same, and the final SEA ER has been updated to incorporate these changes.

A summary of the final objectives, in indicators and targets is included in Table 2.1.

Table 2.1 Summary of Objectives, Indicators and Targets

Environmental Component	Draft Objectives	Draft Targets	Draft SEA Indicators
Biodiversity	<ul style="list-style-type: none"> Preserve, protect, maintain, restore and, where appropriate, enhance or restore the terrestrial, aquatic³ and soil biodiversity, particularly EU designated sites Ensuring no adverse effects on the integrity of any European site, with regard to its qualifying interests, associated conservation status, structure and function To achieve the conservation objectives of European Sites (SACs and SPAs) and other sites of nature conservation Conserve and protect other sites of nature conservation including NHAs, pNHAs, National Parks, Nature Reserves, Wildfowl Sanctuaries as well as protected and threatened species outside these areas Conserve sustainable populations of native animals and plants in line with the Habitats and Birds Directives Safeguard national, regional and local designated sites and supporting features related to areas of forestry which function as stepping stones for migration, dispersal and genetic exchange of wild species Enhance biodiversity of forest areas and ecosystems in line with the National Biodiversity Plan and its targets Preserve genetic resources of forests long term To protect, maintain and conserve biodiversity and natural capital of forest areas Protect, conserve, enhance where possible and avoid loss of diversity and integrity of the broad range of habitats, species and wildlife corridors within forests Ensure forest operations do not damage forests 	<ul style="list-style-type: none"> No loss of protected⁴ habitats and species during the lifetime of the Plan, seeking to maintain and restore status of European sites where possible Maintenance of favourable conservation status for all habitats and species protected under the Habitat Directive Creation of new connectivity between areas of local biodiversity and no loss of ecological networks or parts thereof which provide significant connectivity between areas of local biodiversity without remediation No loss of native forests Ensuring any forest management practises, including felling, afforestation, maintenance and any construction of new forest roads do not impact negatively on biodiversity and are subject to appropriate environmental assessments Particularly where they may affect European Sites An increase in biodiversity in line with the 4th National Biodiversity Action Plan Siting of forestry related development and or infrastructure installation on non-sensitive sites Biodiversity, ecosystem services and forestry are integrated into all decision making across the Plan and within development plans, internal guidance documents, planning application considerations, and Department-led projects Contribute to the restoration and expansion of native woodland (in line with Ireland's National Biodiversity Plan) Reduced incidents of eutrophication/ water pollution, sediment loss 	<ul style="list-style-type: none"> Number and condition of Natura 2000 network, European sites in proximity to forested areas, as per Article 17 Reports, and the maintenance of conservation objectives Status of Annex 1 forest habitats and species as per Article 17 Reports Level of terrestrial and or aquatic habitat creation, removal, degradation, or fragmentation Achievement of favourable conservation status of designated sites Population and range of Designated Species Choice of site-adapted tree species, planting material and nutrients Area of woodland and forests Area of new woodland and forest creation Scale of afforestation and number of trees permitted in proximity/within European sites/sites of ecological importance Achievement of the Objectives of the National Biodiversity Action Plan Status of water quality in the country's water bodies Number of incidences of eutrophication and or water pollution Number of forest fires Number of incident responses – e.g following flooding, fire, invasive species occurrence etc Changes in trends in perceived health status

³ Aquatic refers to marine and riverine aquatic biodiversity

⁴ Protected refers to any habitats and or species protected under the EU Directive on the Conservation of Habitats, Flora and Fauna (92/43/EEC), commonly known as “the Habitats Directive” and Article 17 Reports

Environmental Component	Draft Objectives	Draft Targets	Draft SEA Indicators
	<ul style="list-style-type: none"> Maintain forest health and vitality through protection against pests and diseases and, where possible, eliminate threats to biodiversity Support sustainable deer management 	<ul style="list-style-type: none"> Reduced number of forest fires No loss of forest health and vitality as a result of forestry operations Implementation of appropriate biosecurity measures to aim to protect and conserve Irish native species Identify invasive species in Irish forests and develop appropriate management techniques for their control and spread Reduced prevalence of tree disease and maintenance of tree health and control/manage/eradicate invasive species Avoid aggravating adverse impacts on deer populations and woodland areas arising from deer fencing and other deer management approaches (in line with the Deer Management in Ireland Framework for Action) Promote the benefits of sustainable deer management 	<ul style="list-style-type: none"> Census population data <ul style="list-style-type: none"> Number of health and safety incidents among forest workers Number of new and or improved recreational facilities and or routes related to the forest industry Number of people utilising forests for amenity and recreational purposes Number of public rights of way lost through recreational forest areas
Population and Human Health	<ul style="list-style-type: none"> Protect, enhance and improve human health and wellbeing To ensure forest operations are carried out safely Contribute to the well-being of workers and local populations Provision of green spaces for amenity and recreational uses Promote economic growth Support forest owners and or managers to sustainably and effectively manage their plantations 	<ul style="list-style-type: none"> No significant deterioration in human health as a result of environmental factors No spatial concentrations of health problems arising from environmental factors Minimisation and mitigation of health and safety incidents among forest workers Increased and enhanced recreational, learning and volunteering use of forests, whereby forest operations are carried out in a manner that is compatible with these activities Increase number of green spaces, amenities, walking and or cycling routes, where appropriate, through forests areas for the public Maintenance of public rights of way in forest areas Implementing the draft Implementation Plan to contribute to and facilitate towards economic growth Increased number of people working in the forestry sector 	<ul style="list-style-type: none"> Economic growth statistics for individuals working in the forestry industry Rates of unemployment per County Number of individuals working in the forestry sector

Environmental Component	Draft Objectives	Draft Targets	Draft SEA Indicators
Land and Soil	<ul style="list-style-type: none"> Protect high quality and sensitive soils against pollution, erosion and acidification and prevent degradation of the soil resource Achieve good soil fertility Minimise the off-site impact of forest operations on the environment, sensitive habitats and soils Increase the level of afforestation in appropriate locations Conserve, protect and avoid loss of integrity of designated geological features Protect and enhance geodiversity features and geomorphological processes Maintain and improve soil stability Help to prevent or reduce soil erosion, slope failure, and compaction in forest areas 	<ul style="list-style-type: none"> Protect and enhance soil quality, function, and fertility Avoid soil contamination as a result of forest management practises or construction of forest roads Ensure polluting substances are appropriately stored and banded where the construction of forest roads and or developments are permitted To achieve annual afforestation targets, in appropriate locations To reduce level of illegal deforestation or tree felling. Illegal deforestation consists of tree removal that is not required and or permitted for development or habitat restoration during the lifetime of the Plan Number and status of sites designated as County Geological Sites Limited and controlled forestry developments To adopt appropriate environmental protection procedures during all construction and maintenance works on site for forestry developments and operations 	<ul style="list-style-type: none"> Number and condition of designated geological features Incidences of pollution events related to forestry Erosion and sedimentation rates of soils in forests and surrounding areas Nitrogen deposition rates Acidification rates of soils in forest areas Number of hectares forested annually Number of tree-felling licences granted Area of land subject to illegal deforestation The number of non-compliances with licence conditions following post licence felling inspections Rates of forestry creation and forestry related developments e.g., forest roads and construction, where permitted and appropriate
Water	<ul style="list-style-type: none"> Ensure that the status of water bodies are protected, restored and no deterioration will be seen-in line with the objectives of the Water Framework Directive and Marine Strategy Framework Directive Improve and or maintain water quality and the management of watercourses to comply with the standards of the Water Framework Directive and incorporate the objectives of the Floods Directive into sustainable development Reduce the impact of polluting substances from forestry operations and developments to all waters and prevent pollution and contamination of ground water by adhering to aquifer protection plans Reduce incidences of sedimentation and eutrophication and address existing and ongoing sedimentation or hydrological issues 	<ul style="list-style-type: none"> All waters within the plan area to achieve the objectives of the Water Framework Directive and the relevant River Basin Management Plan by 2027 Achieve compliance with Groundwater Quality Standards and Threshold Values under Directive 2006/118/EC (protection of groundwater) Contribute to River Basin Management Plan (RBMP) enhancement measures No change to, or deterioration of water bodies as a result of water pollution from forestry operations and or planting Improvement or at least no deterioration in surface and ground waters. Avoid declines in surface water and groundwater quality and quantity as a result of forestry-related activity 	<ul style="list-style-type: none"> Proportion of water bodies in forestry catchments meeting their WFD Ecological Status objectives, as reported by the EPA Water Monitoring Programme for the WFD The number of waterbodies that have deteriorated in ecological status or chemical status Status of aquatic habitats and species Number of significant pollution events recorded Compliance of surface waters with national and international standards Compliance of surface waters with national and international standards

Environmental Component	Draft Objectives	Draft Targets	Draft SEA Indicators
	<ul style="list-style-type: none"> Avoid inappropriate development in areas at risk of flooding and areas that are vulnerable to current and future erosion Protect flood plains and areas of flood risk from forestry development through avoidance, mitigation and adaptation measures Improve catchment hydrology in the Plan area to reduce flooding 	<ul style="list-style-type: none"> Minimise flood risk through appropriate management of flood vulnerable zones. Support flood prevention measures, where appropriate Promote sustainable drainage practices to improve water quality and flow in and around forest areas Improve status and quality of catchment areas in and around forest areas 	<ul style="list-style-type: none"> Number of forestry related pollution incidences Annual costs of forest damage related to flood events Past flood risk events in or around forest areas
Air, Noise and Climate	<ul style="list-style-type: none"> To avoid, prevent or reduce harmful effects on human health and the environment as a whole resulting from emissions to air from transport Meet Air Quality standards for the protection of human health and vegetation and move towards compliance with WHO guidelines Reduction of emissions of sulphur dioxide, nitrogen oxides, volatile organic compounds, ammonia and fine particulate matter which are responsible for acidification, eutrophication and ground-level ozone pollution Contribute towards the reduction of greenhouse gas emissions in line with national targets Adaptation to climate change Achieve Paris Agreement reduction in emissions of greenhouse gases Integrate sustainable design solutions into infrastructure Minimise emissions of greenhouse gases and contribute to a reduction and avoidance of human-induced global climate change Reduce forestry related transport operations within the plan area by way of an integrated approach to sustainable transport Decrease noise and air pollution for forestry operations and move closer to WHO recommended levels 	<ul style="list-style-type: none"> Improvement in Air Quality trends, particularly in relation to transport related emissions of NOx and particulate matter from forestry transport and operations Meeting and improving Air Quality Standards for human health and vegetation Contribute towards the target of aggregate reduction in carbon dioxide (CO₂) emissions in accordance with the Climate Action Plan Minimise air quality and nuisance issues associated with forestry-related activity Maintain and enhance the carbon sequestration of forest ecosystems To increase climate change-resilient tree species within the Plan area Achievement of Paris Agreement GHG emission reduction targets Increase in renewable energy use in Ireland, particularly increasing the potential for low carbon technology to support forestry activities Establish incentives and or increase the number of permissions for renewable energy projects and facilitation of timber use throughout the construction sector Contribute towards transition to a competitive, low-carbon, climate-resilient and environmentally sustainable economy by 2050 To achieve a 51% reduction on GHG emission levels (compared with 2018 levels) by 2030 	<ul style="list-style-type: none"> Air Quality Monitoring Result in Ireland Forestry related traffic, transport and vehicular survey data Compliance with national Air Quality Standards (AQS) Area of forest cover Annual afforestation targets for Ireland Types of climate change-resilient tree species incorporated into the Plan area Rates of energy and or renewable energy consumption Promotion of renewable sources related to forestry e.g., use of forest-based renewable energy sources for heat and construction works GHG emission reductions over the Plan period Greenhouse gas emissions from permitted Forestry operations and developments Traffic surveys for forestry operations Noise monitoring data from licensed forestry operations Onsite dust monitoring of forestry operations

Environmental Component	Draft Objectives	Draft Targets	Draft SEA Indicators
		<ul style="list-style-type: none"> Contribute towards the target of the Renewable Energy Directive (2009/28/EC), for all Member States Maintain ambient air quality through reduction of private vehicle usage for forestry operations, amongst promoting the electrification of forestry transport fleets Minimise noise and emissions during construction and operation of new forestry related developments 	
Archaeological, Architectural and Cultural Heritage	<ul style="list-style-type: none"> Protect and conserve the cultural heritage including the built environment and settings; archaeological recorded and unrecorded monuments, architectural (Protected Structures, Architectural Conservation Areas, vernacular buildings, materials and urban fabric) and manmade landscape features (e.g., field walls, footpaths, gate piers etc.) within and surrounding forest areas Increase understanding and awareness of woodland-related natural and cultural heritage To ensure the restoration and re-use of existing uninhabited and derelict structures where possible opposed to demolition and new build (to promote sustainability and reduce landfill) 	<ul style="list-style-type: none"> Protect entries to the Record of Monuments and Places, and the immediate setting of these entries including relationships with the surrounding landscape where relevant, from adverse effects resulting from development which is granted permission under the draft Implementation Plan; and where archaeological sites or monuments (or portions of such) have to be removed due to development the approach of preservation by record is applied More generally ensure permitted developments, where possible, avoid impacts on cultural heritage, including Protected Structures, Architectural Conservations Areas and other significant landscape features; and protect the amenities of such structures, and features Avoid direct impacts for forestry operations on heritage assets, including archaeological sites and monuments Avoid adverse impacts on historic landscapes Protect and enhance areas of ancient and semi-natural woodland Maintenance and enhancement of archaeological heritage- including entries to the Record of Monuments and Places and unknown archaeology- and the context of the above within the surrounding landscape where relevant Increase public awareness of woodland-related natural and cultural heritage 	<ul style="list-style-type: none"> Number of entries to the Record of Monuments and Places, and the immediate setting of these entries including their relationships with forestry projects, forest areas and the surrounding landscape Full or partial loss to entries to the RPSs/NIAs in forest areas Archaeological Impact Assessments related to forest creation and or development, and or the number and types of archaeological investigations undertaken Educational facilities and or opportunities to promote awareness of woodland-related natural and cultural heritage Range and extent of areas of heritage potential related to forest areas and or forestry development Number of uninhabited and derelict structures in forest areas

Environmental Component	Draft Objectives	Draft Targets	Draft SEA Indicators
		<ul style="list-style-type: none"> • Regeneration of derelict and underutilised heritage sites • To increase the number of uninhabited and derelict structures that are restored opposed to demolition 	
Landscape and Visual	<ul style="list-style-type: none"> • To implement the identification, assessment, protection, management and planning of landscapes having regard to the European Landscape Convention, where forest creation and or development are permitted • Conserve, protect and enhance valued natural, cultural and built landscapes, views of local value and features including those of geological and aesthetic value, in relation to forest creation and or development • Maintain and enhance landscape quality within the plan area by minimising visual impacts through appropriate forest design, assessment and siting • Contribute to scenic value, including distinctiveness and diversity of landscapes in the Plan area 	<ul style="list-style-type: none"> • No afforestation or development which will result in avoidable adverse visual impacts on the landscape • Ensure forestry development and or creation is sensitive to its surroundings • Ensure no significant disruption of high landscape values • No visual impacts to a landscape through any forestry operation, creation and or developments • Improve protection for landscapes of recognised quality and protected views • Improve degraded landscapes across Ireland • Enhance provision of, and access to, green space in forest areas, where appropriate • Ensure no significant disruption of historic and or cultural landscapes and features through objectives of the Plan 	<ul style="list-style-type: none"> • Rates of forestry development within designated landscapes • Rates of forest developments and planting • Percentage change related to forestry creation and or development • Compliance with planning and or licensing conditions relating to landscape and forestry creation and or development • The number of Forestry Appeals Committee (FAC) cases raised where landscape or visual issues are mentioned in relation to instances of afforestation, felling, forest road works and or aerial fertilisation
Material Assets	<ul style="list-style-type: none"> • To promote the effective and sustainable use of forest products e.g., biomass use for energy and timber use within the construction sector • Provide productive employment within the forestry sector • Contribute to the viability of rural communities • Make best use of existing infrastructure and promote the sustainable development of new infrastructure related to the IFSIP or forestry sector, where appropriate • Integrate forestry with other land uses, including minerals agriculture and energy • Implement the waste hierarchy and encourage reuse/recycling of forestry related waste disposal and materials wherever possible 	<ul style="list-style-type: none"> • Continuation of or increased economic growth from the export of forest products that are efficient and cost effective • Increase in renewable energy developments related to the forestry sector • Increase local employment opportunities with increased forest operations and planting • Increased amount of forest products available for use e.g., forest biomass as a renewable energy source and or timber for construction • The sustainable management of forests to ensure continuity of supply • Improve efficiencies of forest transport, energy and communication infrastructure 	<ul style="list-style-type: none"> • Statistics on the quantity of forest products exported • Achievement of Ireland's renewable energy targets and increased use of biomass as a renewable energy source • Employment Statistics for the forestry Sector • Number of modern apprenticeships • Amount of forest products available and the value of and or revenue of products • Amount of biomass used for renewable energy generation in Ireland annually • Location and/or level of forestry related infrastructure including forest roads

Environmental Component	Draft Objectives	Draft Targets	Draft SEA Indicators
		<ul style="list-style-type: none"> • Effectively integrate multiple land use types with forestry in a sustainable and appropriate manner that will see no deterioration • Reduce the generation of forestry related waste and adopt a sustainable approach to waste management for the forestry industry • Reduction in the quantities of forestry waste disposal sent to landfill 	<ul style="list-style-type: none"> • forestry related innovation and technological advancements, and the success rates of such • Rate of waste disposal related to forestry going to landfill statistics

2.5.3 Consideration of Alternatives

2.5.3.1 Introduction

As described in the SEA ER, a number of alternative IFSIP scenarios were considered and assessed as part of the SEA. These generally related to alternative levels of ambition with which would satisfy the objectives of the overarching Forestry Strategy and Vision Statement.

The alternative plan scenarios considered and assessed as part of the SEA ER are summarised in Section 2.5.3.2.

2.5.3.2 Identification of Reasonable Alternatives

As discussed in Section 1X, the IFSIP is the enabler for Ireland's Forest Strategy. It provides a detailed plan for the implementation of the Forest Strategy in the short-term, including including Actions, Measures, and planned Interventions with the proposed allocation of funds to each priority area, planned interventions with the proposed allocation of funds to each priority area.

Thus, prior to the consideration of alternatives for the IFSIP, a number of different scenarios for the Forest Strategy were first considered, including:

- Scenario 1 - A shared national approach is not achieved ('Do-Nothing')
- Scenario 2 – New Principles/ Shared Vision being applied with only modest planting levels happening ('Do- Minimal')
- Scenario 3 – High Level of Ambition ('Do-Something')

Following consideration of the above scenarios, it was decided that Scenario 3 was the most ambitious and preferred plausible scenario. The Forest Strategy was developed on this basis.

Once the Forest Strategy was developed, a range of further alternatives for how this high level of ambition would be delivered via the IFSIP were then considered. These alternatives are set out in below.

1. Alternative 1: Do Nothing

DAFM considered whether it would be appropriate to not launch a new Forestry Programme, and no guidelines would therefore be put in place for the future development of the forestry sector. It is noted the launch of a new Programme requires Government approval, sanction from the Department of Public Expenditure and Reform and State Aid approval from the European Commission.

~~The requirement for a new Forestry Programme is not set out in legislation and a significant amount of State funding will be required to support the Programme. The launch of a new Programme requires Government approval, sanction from the Department of Public Expenditure and Reform and State Aid approval from the European Commission.~~

Thus, Alternative 1 considers what would happen if the current Forestry Programme (2014-2020 extended to end 2022) was not replaced.

2. Alternative 2: Continue with the current Forestry Programme Measures

DAFM considered whether it would be viable to continue with the current Forestry Programme 2014-2020 (extended to end 2022). The current Programme underwent public consultation and was subject to the SEA/AA process, so the option of continuing with the current model was considered.

This Alternative would mean no change to any of the current Schemes offered and a continuation of the current Grants and Premium Categories (GPCs) of forests offered through the Afforestation Scheme. If this option was chosen DAFM would need to apply for State Aid approval.

3. Alternative 3: Preparation of a new IFSIP with inclusive Forest Action Plan and Forestry Programme of Measures and Interventions

This Alternative considers the preparation of a new IFSIP inclusive to a Forest Action Plan and Forestry Programme of Measures and Interventions, as described in Section 1 of this report. The IFSIP includes 8 Interventions in the associated Forestry Programme, listed as follows:

- Forest Creation;
- Creation of Agroforestry Systems;
- Infrastructure and Technology investments;
- Sustainable Forest Management;
- Developing skills and empowering people for sustainable forest management;
- Open Forest Measure: Social, cultural and heritage forests (existing forests);
- Climate Resilient Reforestation; and
- Reconstitution.

The IFSIP also includes a number of Actions in the associated Forestry Action Plan, listed under the following strategic areas of focus which are aligned with each of the Goals in the Action Plan:

- Planning, Engagement and Co-Creation;
- Public Access and Community Involvement;
- Regulation, Legislation and Incentives;
- Value Creation;
- Ecosystem Services, Resilience, Restoration, and Legacy Issues;
- Forest Management;
- Building Capacity; and
- Institutional arrangements and Implementation Structures.

2.5.4 Assessment Stage 1

The first stage of the SEA assessment process comprised the first draft of the appraisal matrix that was completed by the SEA team. This was based on the initial draft of the IFSIP and provided to DAFM for their consideration.

This objectives-led assessment compared the likely impacts of each Intervention, Measure and Actions in the initial draft IFSIP against the strategic environmental objectives (as described in Section 2.5.2) with respect to the baseline information. Particular reference was made to the potential for cumulative effects in association with other relevant plan and programmes.

The assessment process categorised environmental impacts using the ratings outlined in Table 2.2 which is based on the impact assessment criteria defined by the EPA for environmental impact assessment.

Table 2.2 Impact Ratings

Significance of Impact	
	Positive
	Neutral
	Negative
	Uncertain

The assessment also considered the potential for cumulative effects of policies on each other to determine if certain policies working in combination could have an environmental impact.

Upon completion of the first appraisal matrix, a number of recommendations were made which were then reviewed in detail by DAFM and where appropriate, incorporated into the IFSIP, such as changes to wording of their Intervention, Measures and Actions.

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2.5.5 Assessment Stage 2 - Final draft Plan

The next stage of the assessment comprised the revision of the appraisal matrix to take on board comments received from DAFM on the initial Draft IFSIP and the associated first draft appraisal matrix.

This appraisal matrix was incorporated into the SEA draft Environmental Report that accompanied the draft IFSIP that went out for public consultation on 19th of October 2022. The principle environmental effects, as per the assessment matrix, identified are summarised below, relevant to the proposed Interventions, Measures and Actions.

The Actions, Measures, and Interventions in the IFSIP were assessed with respect to the existing environmental baseline and the environmental objectives and targets. The assessment included in Section 8 of the SEA Environmental Report also took regard for transboundary effects of the IFSIP on Northern Ireland, particularly in relation to the air quality, climate and water assessments, the potential for transboundary effects between the Republic of Ireland and Northern Ireland has been considered throughout the assessment process.

As the Actions, Measures and Interventions included in the IFSIP have been designed to promote sustainable forest management, the environmental assessment outcomes are generally positive, or neutral. Matrices were prepared to identify potential impacts across the plan area and those likely impact relevant to specific areas of the plan area.

The IFSIP contains a range of Actions, Measures and Interventions relating to forest creation, afforestation and reforestation. Increasing forest cover in Ireland has been assessed as likely to result in overall long-term positive effects on the environment, particularly air and climate factors. However, inappropriate forest expansion and management have the potential to give rise to negative effects, such as pollution events or spread of invasive species.

A generally positive effect on population and material assets is identified, where increased forest areas for amenity, recreation and learning potential will be facilitated. However, increased human interaction in forested areas, and any associated development, such as carparks, public toilets etc. within forests have the potential to negatively affect some aspects of the environment, through potential contamination, clearance and/or disturbance.

Predominantly positive impacts on population and human health have been assessed as likely to result from the IFSIP, however, it has also been considered that there is potential for negative impacts on communities and or individuals where there is potential for inappropriate afforestation emanating from the IFSIP. Examples may include the potential for damage to individuals properties and or obstruction of property views.

The IFSIP also contains a range of Measures relating to the promotion of wood-based products for construction and energy purposes. An overall positive impact on the environment is identified here, through the promotion of a sustainable, renewable source of building materials and energy production. Positive effects are particularly noted here on air and climate factors.

Increased forest creation, afforestation and reforestation are likely to result in overall positive, long-term effects on climate. In this way, the IFSIP has the potential to contribute positively and cumulatively towards a wide range of Irish Government policy, within the context in which it sits. For example, the IFSIP positively contributes towards the objectives of the National Climate Action Plan through the extensive suite of Interventions, Measures and Actions relating to afforestation and the increased use of wood products as a renewable resource. The IFSIP will work to achieve contributions towards reductions in greenhouse gas and other emissions to air and associated achievement of legally binding targets (in combination with plans and programmes from all sectors, including energy, transport and land use planning) as a result of facilitating:

- Greater levels of forest cover;
- Increased use of renewable resources through the provision of wood and wood products; and
- Increased use of timber as a construction material.

Forestry developments including the construction of forest roads and or other infrastructure have the potential to give rise to adverse impacts on the environment, particularly biodiversity; with potential impacts relating to disturbance, disruption, fragmentation, and loss of habitats. Further, any new development in forested areas has the potential to give rise to negative effects on land, soil and water, in the instance of contamination or pollution events.

The IFSIP contains a small number of Measures and Actions that relate to peatland habitats, including, a pilot scheme for native woodland for remediation of industrial cutover peatlands, implementing redesign and habitat restoration measures for forests on peatlands based on the best available science, and supporting the establishment and natural regeneration of native forest on post-industrial cutaway peatlands, where appropriate. All of which, have potential to result in an overall uncertain and or potentially negative environmental impact. Planting on organic (peat) soils has been found, since the publication of the 2022 EPA GHG Projection Report and Climate Action Plan 2023, to have far higher emissions from planting trees on this type of soil than previously envisaged in 2021 Reports. Potentially uncertain effects have been assessed for land, soil, and water as the natural characteristics of peat soil and surrounding water bodies may be negatively impacted upon if planting on peatland is facilitated through Actions, Interventions and Measures outlined in the IFSIP. There is also potential for negative impacts on biodiversity where, replanting on peatland is likely to see disruptions to natural biodiversity. Potential for negative impacts on air quality and climate has been assessed in that, tree planting on organic soils creates greenhouse gas emissions rather than acting as a carbon store. However, an overall uncertain effect on air and climate has been identified as likely in that, while planting on peatlands has been proven to give rise to greenhouse gas emissions, as identified in the climate action plan, it also contributes to an increase in forest cover.

Technological based innovation of the forestry sector, as detailed in Actions, Interventions and Measures of the IFSIP are likely to result in overall neutral or environmental impacts. Promotion of Forest Certification, organisational changes, improved communication structures and the continued implementation of standards and best practice guidance are likely to see overall neutral to positive impacts on the environment, where certain situations represent baseline conditions that are already positively enforced.

2.5.6 Interactions and Interrelationships

In accordance with the SEA Directive, the inter-relationship between environmental aspects must be taken into account. The interaction and inter-relationships of relevance for the environmental baseline aspects was an important consideration for the environmental assessment.

Table 2.3 outlines the identifiable inter-relationships that were taken into account during the environmental assessment. It is noted that all environmental aspects interact with each other to some extent, however only significant relationships were considered.

Table 2.3 Key inter-relationships between environmental aspects.

Environmental Aspect	Bio	P & HH	L & S	Wat	A, Q & C	AA&C H	L & V	MA
Bio								
P & HH	No							
L & S	Yes	Yes						
Wat	Yes	Yes	Yes					
A, Q & C	Yes	No	Yes	No				
AA & CH	No	No	No	No	No			
L & V	Yes	Yes	No	No	No	No		
MA	No	Yes	No	No	Yes	No	No	

2.6 SEA Environmental Report – Consultation

A period of public and statutory consultation process took place from 19th October and 29th November 2022 to gather feedback on the draft IFSIP and supporting draft SEA Environmental Report, in accordance with legislative requirements. The documents were issued to statutory stakeholders and made available for public viewing on the DAFM website.

174 No. submissions were received on the draft IFSIP and SEA ER during this time. The content of submissions and comments received during this consultation period were considered by both Arup and DAFM. Amendments were made in response to those consultation inputs, where considered appropriate. Both the SEA ER, and the IFSIP were updated on foot of the recommendations outlined in the submissions received. Table 4.7 in Appendix C contains a summary of the submissions received and how they were responded to.

2.7 Technical Difficulties Encountered

No technical difficulties were encountered during any stage of the SEA process.

2.8 SEA Mitigation Measures

Mitigation measures are measures envisaged and designed to prevent, reduce and as fully as possible offset any significant adverse impacts on the environment of implementing the IPFS. All mitigation measures have been developed and agreed with DAFM as part of the SEA iterative process. The primary mitigation measure is to ensure the sustainable and appropriate development of the plan area without compromising the integrity of the natural and built environment.

It is recommended that all legislation, policies, environmental requirements, and guidelines outlined in this Environmental Report are adhered to. In addition, future legislation, policies, environmental requirements, and guidelines should also be fully integrated into the IPFS and Environmental Report.

In addition, many impacts will be more adequately identified and mitigated at project and EIA level. In general terms, all proposals for development will be required to have due regard to environmental considerations outlined in this Environmental Report and associated AA Screening. In this section the mitigation measures are discussed under each environmental parameter heading. Refer Table 4.1 in Appendix A for a summary of relevant mitigation from DAFM documents. Refer to Table 4.2 in Appendix A for Mitigation Measures as set out in the accompanying NIR (as they relate to proposed Intervention and Measures). Refer to Table 4.3 in Appendix A for Mitigation Measures set out in the NIR (as they relate to Goals and Actions).

It should be noted that a suite of Requirements and guidance documents have been published by the DAFM over the years. Adherence to these guidelines, environmental requirements and standards is the primary mitigation associated with the IPFS. The following documents, and any future variations or amendments thereto, should be reviewed and complied with, as appropriate, prior to the implementation of any of the measures or actions set out in the IPFS:

- Aerial Fertilisation Requirements. Forest Service (2015) Department of Agriculture, Food and the Marine;
- Environmental Requirements for Afforestation. Forest Service (2016). Department of Agriculture, Food and the Marine.
- Forest Protection Guidelines. Forest Service (2000) Department of the Marine and Natural Resources;
- Forest Recreation in Ireland A Guide for Forest Owners and Managers (2006) Forest Service, Department of Agriculture and Food.
- Forestry & Freshwater Pearl Mussel Requirements: Site Assessment and Mitigation Measures Forest Service (2000) Department of the Marine and Natural Resources;
- Forestry & Kerry Slug Guidelines. Forest Service (2000) Department of the Marine and Natural Resources;
- Forestry & Otter Guidelines Forest Service (2000) Department of the Marine and Natural Resources;
- Forestry and Landscape Guidelines Forest Service (2000) Department of the Marine and Natural Resources;

- Forestry and Water Quality Guidelines. Forest Service (2000) Department of the Marine and Natural Resources;
- Forestry Biodiversity Guidelines. Forest Service (2000) Department of the Marine and Natural Resources;
- Forestry & Archaeology Guidelines. Forest Service (2000) Department of the Marine and Natural Resources;
- Forest Harvesting & the Environment Guidelines. Forest Service (2000) Department of the Marine and Natural Resources.
- Forestry Standards Manual. Department of Agriculture, Food and the Marine Forest Service (2015);
- Forest Road Manual: Guidelines for the Design, Construction & Management of Forest Roads (Ryan, T., Phillips, H., Ramsay, J. and Dempsey, J. 2004. Forest Road Manual).
- Guidelines for the design, construction and management of forest roads. COFORD, Dublin
- Forests & Water – Achieving Objectives under Ireland’s River Basin Management Plan 2018-2021 Department of Agriculture, Food and the Marine (2018);
- Land Types for Afforestation. Forest Service (2015) Department of Agriculture, Food and the Marine.
- Native Woodland Establishment GPC9 & GPC10 Silvicultural Standards Forest Service (2015) Department of Agriculture, Food and the Marine;
- Standards for Felling and Reforestation, (2019), Department of Agriculture, Food and the Marine;
- Woodland for Water: Creating new native woodlands to protect and enhance Ireland’s waters. Forest Service (2018) Department of Agriculture, Food, and the Marine.

Table 4.1 in Appendix A contains a summary of relevant mitigation measures set out in these documents, as relevant to the IPFS. It is noted that there are multitude of ‘uncertain’ environmental effects identified in Table 8.8.1 and Table 8.8.2 of the SEA Environmental Report which have the potential to give rise to negative environmental effects, in the worst-case scenario. The mitigation measures in Table 4.1 are relevant to all Interventions, Measures and Actions and should be implemented accordingly.

An NIR has also been prepared in respect of the IFSIP, the Mitigation Measures set out in the NIR are included in Table 4.2 of Appendix A as they relate to proposed Intervention and Measures, and Table 4.3 in Appendix A as they relate to Goals and Actions outlined in the IFSIP.

Table 4.2 and Table 4.3 in Appendix A should be read in conjunction with those set out in Table 4.1.

Where potential for significant negative environmental effects have been identified in Table 8.8.2 and Table 8.8.3 of the SEA Environmental Report, relevant mitigation measures from the above listed forestry guidance document have been identified. These are described in detail in the below sections.

Forest Road Projects

Potential for significant negative effects have been identified relating to forest road projects, including Intervention 3, Measure 1 and 2, and Action 47:

- **Intervention 3, Measure 1- Forest Road Scheme (Bio, L&S)**

Measure 1 has the potential to result in negative effects on biodiversity, land and soil and water during the construction of the new road infrastructure in forests. It is a recommendation of this SEA that the IFSIP incorporates the mitigation measures in Section 9 of SEA relating to best practice construction measures.

- **Intervention 3, Measure 2- Ecologically Enhanced Forest Roads (L&S), Measure 3- Special Construction Works and Additional Measures (L&S), Measure 4- Engineering Design Support Measure (L&S)**

Measures 2, 3 and 4 represent additional elements to the Forest Road Scheme assessed above and are therefore assessed cumulatively with Measure 1. Measure 2 relates to ecological enhancement measures for forest roads. With these Measures in place, the Forest Road Scheme assessment classification is upgraded from negative to 'uncertain' with regards biodiversity, through the recognition of the ecological enhancement measures that, once operational, will positively effect biodiversity. It is nevertheless recognized that any infrastructural development has the potential to result in negative effects on biodiversity in the construction phase.

- **Action 47- Support Schemes to Improve Road Access to Forests (Bio, L&S)**

Action 47 has the potential to result in negative effects on biodiversity, land and soil and water during the construction of the new road infrastructure in forests.

Relevant Mitigation:

- All of the mandatory requirements set out in the full suite of DAFM documents must be complied with, (Forestry and Water Quality Guidelines still relevant here)
- Prior to the design or development of forest roads, regard should be had to the Forest Road Manual: Guidelines for the Design, Construction & Management of Forest Roads (COFORD, 2005)
- Under Irish legislation, EIA is mandatory for the following forestry projects:
 - private roads which would exceed 2,000 metres in length (S.I.600 of 2001, as amended by S.I.235 of 2008) and Regulation 13(2)(b) of S.I. 191 of 2017). Where EIA is not mandatory, regard should be had to Section 11(d)(i) of the Forestry Act 2014, Regulation 13(2)(d) Forestry Regulations 2017, and Part 2 of Schedule 5 of the Planning and Development Regulations 2001, as amended, and an EIA Screening carried out, as required.
- The development of new forest roads should be subject to options assessment, where appropriate.
- Access to forest land should select the least environmentally sensitive route and utilise existing access where available and suitable
- Archaeological monitoring of specified sections of a forest route by an independent archaeological consultant is required where it is determined that there is an elevated potential for impacts on known or suspected archaeological sites and monuments or other important built heritage structures or features in those sections.
- The potential of operations to cause disturbance should be considered and where possible, reflected in the timing operations
- Alternative options such as lower density roading, temporary bridging and the adoption of alternative silvicultural systems, will be considered on case-by-case basis, on sites with acute water sensitivity.
- Ensure that stream and river crossings constructed for forestry purposes are developed in compliance with the Coford Forest Road Manual and the Inland Fisheries Ireland Guidelines on the Protection of Fisheries During Construction In or Adjacent to Waters.

Temporary Bridging and Road Reinforcements

Potential for significant negative effects have been identified relating to temporary bridging and road reinforcements, including Intervention 3, Measure 6:

Measure 6- Temporary Bridging and Road Reinforcements (Bio, Water)

Measure 6 has the potential to result in negative effects on biodiversity and water quality as a result of the temporary water crossings, through potential contamination or disturbance of the water or riverbanks at the location of the crossings. An uncertain effect on landscape and visual is also identified in that large structures could result in an impact on the visual amenity.

Relevant Mitigation:

- All of the mandatory requirements set out in the full suite of DAFM Requirements documents must be complied with.
- All temporary bridging and road reinforcements will be subject to the appropriate assessment process and EIA process, where required, and located only where appropriate.
- Crossing structures (bridges, fords, etc.) must not impede the waterflow.
- Machinery used in forest operations should be managed so as to minimise the potential for any offsite air, noise or vibration impacts.
- Prior to operations commencing, all machine operators and other site personnel will be appropriately briefed by the appointed Works Manager, Registered Forester or Site Ecologist, on the specific sensitivities of the site and on all relevant conditions, including the location of all exclusion zones and environmental setbacks
- Where instream works are required, and to prevent the spread of freshwater invasive species and disease (e.g. Crayfish Plague, Zebra mussel, fishhook waterflea), any vehicles, tools and PPE directly involved in instream works, e.g. culvert for access purposes, are clean (disinfected and dried) and free of soil/sand/gravel and plant debris before entering and leaving the site.
- Sediment must be prevented from entering aquatic zones. This is achieved by adherence to Environmental Requirements for Afforestation, Standards for Felling and Reforestation and any site-specific measures that may also be required
- Regularly check silt traps and silt fences, and maintain as required, to ensure their continued effectiveness throughout works.
- If vegetation clearance with machine is required, particular care is needed to guard against soil damage, compaction, rutting or removal. Subsequent spraying may also be required, using approved herbicide appropriate to the target vegetation
- Where trees are required to be removed (e.g. to facilitate the erection of a fence), a felling licence may be necessary
- Good site hygiene and biosecurity controls will be employed to prevent the introduction and spread of invasive alien species (e.g. rhododendron, Japanese knotweed) by thoroughly checking/washing vehicles prior to entering and leaving the project site
- All forest operations within areas of high-water sensitivity (such as Freshwater Pearl Mussel catchments and high-status objective waterbodies) must be planned and managed with a particular regard to the protection of water quality, aquatic ecosystems and species.
- Create and maintain dense mats of brash and branch wood on all machine routes where necessary, to avoid significant soil damage, erosion and sedimentation that will cause significant environmental impact in the absence of mitigation.

Planting on Peatlands

Potential for significant negative effects have been identified relating to planting on Peatlands, including Action 43 and Action 64:

Action 43- Redesign and Habitat Restoration for Forests on Peatlands (Bio, L&S, Water)

Action 43, it is assumed, for the purpose of this assessment that the ‘redesign measures’ outlined in this Action, refer to an increase in forest cover within a particular area and or layout of peatland. A negative effect on land and soil and water is identified in that, afforestation on peatlands is likely to disrupt the natural characteristics of peat soil and the surrounding water bodies. If considered appropriate, sub-standard forestry operations have the potential to result in erosion, landslides, compaction, contamination, losses of soil

organic matter, erosion, soil sealing, leaching, and changes in soil biodiversity. Soil contamination can result in leeching, and potential eutrophication of waters. A negative impact has also been assessed for biodiversity as unless the peatland areas considered have been exhausted of their carbon sink capabilities, replanting on peatland is likely to see disruptions to natural biodiversity.

Action 64- Establishment and Natural Regeneration of Native Forest on Post-Industrial Cutaway Peatlands (Bio, L&S, Water)

A negative effect on land and soil and water is identified in that, afforestation on peatlands is likely to disrupt the natural characteristics of peat soil and the surrounding water bodies. If considered appropriate, sub-standard forestry operations have the potential to result in erosion, landslides, compaction, contamination, losses of soil organic matter, erosion, soil sealing, leaching, and changes in soil biodiversity. Soil contamination can result in leeching, and potential eutrophication of waters. A negative impact has also been assessed for biodiversity as, unless the peatland areas considered have been exhausted of their carbon sink capabilities, afforestation on peatland is likely to see disruptions to natural biodiversity.

Relevant Mitigation:

- Minimum setback, as measured from the surfaced edge of the public road: 10 metre for broadleaves and 20m for conifers, (average, within any one application) (For conifer plots, note the additional requirement regarding edge planting)
- The Registered Forester must assess the potential risk of sedimentation and nutrient runoff entering into 'receiving waters' (aquatic zones (streams, rivers, lakes)), both during afforestation establishment phase. Forest management must continue to assess sedimentation and nutrient runoff throughout the remainder of the rotation and adapt the forest design and planned operations accordingly
- Ensure that an adequate contingency plan is prepared. This plan must clearly inform operators how to react and who to contact, should an unexpected event arise that may create a risk to the environment, e.g. a period of intense rainfall, an accidental spillage of chemicals, the discovery of an unidentified archaeological site, monument or object. The plan should be readily available onsite and all operators should be made familiar with its content.
- The Registered Forester must ensure that all operators are aware of the importance of any environmental setbacks required onsite, their location and extent, and what is and is not permitted within them. An environmental setback must not be used for any forest operation or for any other purpose which could compromise its protective function, or which could damage the environmental feature or sensitivity being protected. Minimum environmental setbacks to be applied are set out in the Environmental Requirements for Afforestation.
- Where afforestation is approved near known or suspected archaeological sites and monuments or other important built heritage structures or features, to seek to ensure that: (i) appropriate exclusion zones, fencing, access paths and other relevant measures are determined and required by condition to be incorporated into the project design; (ii) provision is made so there is an appropriate response should any previously unrecorded archaeological site, monument, object, structure or feature be discovered during site work; and (iii) any approved design is sympathetic to and provides an appropriate visual setting for such sites, monuments, structures or features. The minimum environmental setbacks set out in the Environmental Requirements for Afforestation should be applied, unless conditions specify otherwise.
- Existing access routes to an archaeological site must be left unplanted and undisturbed, and must be left open for pedestrian access by archaeological officials throughout the rotation. If there is no existing access route, leave an unplanted 4 metre wide route suitable for pedestrian access from the direction of the nearest public road, forest road or track.
- An Archaeological Assessment / Archaeological Impact Statement is required for sites where it is determined that there is a significantly elevated potential for impacts on known or suspected archaeological sites and monuments or other important built heritage structures or features.

- Monitor to ensure the successful establishment of forest edge planting and environmental setback planting (where undertaken) and maintain trees as appropriate (e.g. vegetation management, replacement of mortalities, adjustment and eventual removal of tree shelters) until the trees are established and free of vegetation competition or browsing pressure.
- Retain hedgerows, existing veteran trees, earth banks and stone walls unless required for access.
- An appropriate ecological assessment is required in sites where the habitat of Annex I bird species or Annex II species occur or are likely to occur to investigate the potential for where they occur.
- Each site being assessed for suitability must, amongst other things, undergo a preliminary soil investigation by a Registered Forester.
- Afforestation will be restricted to native tree species in the Top 8 Freshwater Pearl Mussel Catchments, namely: Bundorragha, Caragh, Corrib, Cummeragh, Dawros, Kerry Blackwater, Leannan and Ownagappul.
- The DAFM shall take cognisance of the EPA programme of water monitoring, particularly in the 233 waterbodies where forestry is identified as a pressure, and will engage with the Local Authorities Water Monitoring Programme (LAWPRO) Local Catchment Assessments (LCA). In addition, DAFM will undertake a programme of water monitoring using biological indicators in heavily forested waterbodies.
- Consideration should be given to timing of ecological surveys

Use Of Forests for Recreation, Tourism, Public Access, and Education

Potential for significant negative effects have been identified relating to the use of forests for recreation, tourism, public access, and education, including Intervention 6, Measure 2 and 3, Action 15, Action 74, Action 71, Action 76, Action 85.

Intervention 6, Measure 2- Neighbourhood Scheme (Bio, L&S, Water), Measure 3- Neighbourhood-The Active Forest (Bio, L&S, Water), Measure 4- Neighbourhood - Heartwoods (Bio, L&S, Water)

Measure 2, Measure 3 and Measure 4 of this Intervention relate to the provision of forest amenities and facilities in existing forests. Increased human interaction in forested areas, and any development- such as carparks, public toilets etc. within forests have the potential to negatively affect biodiversity, land and soil and water through potential contamination, clearance and/or disturbance.

Action 15- Recreation Areas and Visitor Destinations (Bio, L&S, Water)

Action 15 relates to the provision of recreation areas and the development of visitor destination, in existing forests. Increased human interaction in forested areas, and any development- such as carparks, public toilets etc. within forests have the potential to negatively affect biodiversity, land and soil and water through potential contamination, clearance and/or disturbance. It is a recommendation of this SEA that where forest amenities and facilities in existing forests are to be provided, they should be subject to the appropriate assessment procedure/suitable environmental assessments. It is also recommended that the IFSIP implement the mitigation measures set out in Section 9 of this SEA relating to forest operation and management.

Action 74- Public Access, Education and Recreation in Forests in or Near Villages, Towns and Cities. (Bio, L&S, Water)

Action 74 relates to the provision of public access and recreation in existing forests. A positive effect is identified with regards population and material assets, through enhanced amenities and facilities. However, increased human interaction in forested areas, and any development- such as carparks, public toilets etc. within forests have the potential to negatively affect biodiversity, land and soil and water through potential contamination, clearance and/or disturbance. It is a recommendation of this SEA that where forest amenities

and facilities in existing forests are to be provided, they should be subject to the appropriate assessment procedure/suitable environmental assessments.

Action 71- Review and Expand the Neighbourhood Scheme to Support the Creation of New Public Amenity Forests and Enhancement of Existing Forests for Public Access, Education, Recreation and Health and Wellbeing for Rural and Urban Communities. (Bio, L&S, Water)

Action 71 relates to the provision of forest amenities and facilities in existing forests. A positive effect is identified with regards population and material assets, through enhanced amenities and facilities. However, increased human interaction in forested areas, and any development- such as carparks, public toilets etc. within forests have the potential to negatively affect biodiversity, land and soil and water through potential contamination, clearance and/or disturbance. It is a recommendation of this SEA that where forest amenities and facilities in existing forests are to be provided, they should be subject to the appropriate assessment procedure/suitable environmental assessments. It is also recommended that the IFSIP implement the mitigation measures set out in Section 9 of this SEA relating to forest operation and management.

Action 76- Creation of New Access, Recreational Facilities and Potential for Eco-Tourism. (Bio, L&S, Water)

Action 76 again relates to measures including enhanced public access to forests, creation of recreational facilities etc. A positive effect is identified with regards population and material assets, through enhanced amenities and facilities. However, increased human interaction in forested areas, and any development- such as carparks, public toilets etc. within forests have the potential to negatively affect biodiversity, land and soil and water through potential contamination, clearance and/or disturbance. It is a recommendation of this SEA that where forest amenities and facilities in existing forests are to be provided, they should be subject to the appropriate assessment procedure/suitable environmental assessments. It is also recommended that the IFSIP implement the mitigation measures set out in Section 9 of this SEA relating to forest operation and management.

Action 85- Support and Promote Non-Wood Forest-Based Economic Activities. (Bio, L&S, Water)

Action 85 relates to the promotion of non-wood forest-based economic activities. In the absence of further information on the same, it is assumed that this relates to forest recreation and tourism initiatives. As outlined previously, a positive effect is identified with regards population and material assets, through enhanced amenities and facilities. However, increased human interaction in forested areas, and any development- such as carparks, public toilets etc. within forests have the potential to negatively affect biodiversity, land and soil and water through potential contamination, clearance and/or disturbance. It is a recommendation of this SEA that where forest amenities and facilities in existing forests are to be provided, they should be subject to the appropriate assessment procedure/suitable environmental assessments. It is also recommended that the IFSIP implement the mitigation measures set out in Section 9 of this SEA relating to forest operation and management.

Relevant Mitigation:

- Where forest amenities and facilities in existing forests are to be provided, they should be subject to the appropriate assessment procedure/suitable environmental assessments where required.
- Ensure that proposals for forestry projects or infrastructure incorporate natural features, where feasible.
- Ensure that forest amenity and recreational facilities are managed in a way which ensures that there is no potential for significant adverse environmental effects.
- To require all proposals relating to forestry or forestry projects to address the presence or absence of invasive alien species on the proposed site and to require an Invasive Species Management Plan where such species are present;
- To prevent the spread of invasive species (e.g. rhododendron, Japanese knotweed), ensure that all vehicles involved in site works are clean and free of soil and plant debris before entering and leaving the site. See <https://invasives.ie/resources/> for identification guides and further information.

- Machinery used in forest operations should be managed so as to minimise the potential for any offsite air, noise or vibration impacts.
- All existing fences and boundaries must be to a standard that can exclude domestic stock and protect the growing crop.
- The treatment and reporting of the discovery of archaeological finds during harvesting or at reforestation stage should be as per the specifications in Section 3.8 (page 44) of the Environmental Requirements for Afforestation (December 2016)
- Store and prepare all chemicals, urea, fuel and machine oils at a dry, elevated location onsite at least 50 metres from the nearest aquatic zone and at least 20 m from the nearest relevant watercourse. Do not utilise water, habitat or archaeological setbacks for this purpose.
- Similarly, undertake all machine refuelling, maintenance and repair at a dry, elevated location onsite at least 50 metres from the nearest aquatic zone and at least 20 m from the nearest relevant watercourse. Do not utilise water, habitat or archaeological setbacks for this purpose. Collect spent oils and remove for correct offsite disposal.

Appendix A contains a table of relevant mitigation measures, as taken from the suite of DAFM guidance and is also inclusive to two mitigation tables as they relate to the Inventions, Measure, Goals and Actions, taken from the accompanying NIR.

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2.9 SEA Monitoring Measures

Article 10 of the SEA Directive requires that monitoring should be carried out in order to identify at an early stage any unforeseen adverse impacts associated with the implementation of the plan or programme.

A monitoring programme is developed based on the indicators selected to track progress towards achieving strategic environmental objectives and reaching targets, enabling positive and negative impacts on the environment to be measured.

As outlined in the EPA guidance document 'Guidance on SEA Statements and Monitoring' (EPA, 2020), SEA monitoring should reflect the nature and level of detail of the plan/programme. Many national-level plans/programmes lack geographic specificity, contain only high-level strategic objectives and do not lend themselves to cause-effect models in terms of direct measuring of environmental effects. As such, SEA monitoring for these plans should focus on national indicators to examine environmental trends.

The monitoring programme outlined in Table 2.5 therefore is based on national indicators and informed by the content of the IFSIP.

The SEA carried out has ensured that any potential significant environmental impacts have been identified and given due consideration.

DAFM is responsible for collating existing relevant monitored data, the preparation of preliminary and final monitoring evaluation reports, the publication of these reports and, if necessary, the carrying out of corrective action.

Table 2.4 Proposed Monitoring Measures for the IFSIP

Environmental Component	Likely Significant Environmental Effects Identified	Draft SEA Indicators	Monitoring Sources	Frequency/Responsibility
Biodiversity	<p>Measure 1 of Intervention 3, and Action 47 have the potential to result in negative effects on biodiversity during the construction of the new road infrastructure in forests</p> <p>Measure 6 of Intervention 3 has the potential to result in negative effects on aquatic biodiversity as a result of the construction of temporary water crossings, through potential contamination or disturbance of the water or riverbanks at the location of the crossings</p> <p>With regards Action 43 and Action 46, it is assumed, for the purpose of this assessment that the 're-design measures' outlined in this Action, refer to an increase in forest cover within a particular area and or layout of peatland. A negative impact has been assessed for biodiversity as unless the peatland areas considered have been exhausted of their carbon sink capabilities, replanting on peatland is likely to see disruptions to natural biodiversity</p> <p>Measure 2, Measure 3 and Measure 4 of Intervention 6, as well as Actions 15, 71, 74, 76 and 85 relate to the provision of forest amenities and facilities in existing forests. Increased</p>	<p>Number and condition of Natura 2000 network, European sites in proximity to forested areas, as per Article 17 Reports, and the maintenance of conservation objectives</p> <p>Status of Annex 1 habitats and species as per Article 17 Reports</p> <p>Level of terrestrial and or aquatic habitat creation, removal, degradation, or fragmentation</p> <p>Achievement of favourable conservation status of designated sites</p> <p>Population and range of Protected and Red List Species</p> <p>Choice of site-adapted tree species, planting material and nutrients</p> <p>Area of woodland and forests</p> <p>Area of new woodland and forest creation</p> <p>Scale of afforestation and number of trees permitted in proximity/within European sites/sites of ecological importance</p> <p>Achievement of the Objectives of the National Biodiversity Action Plan</p> <p>Status of water quality in the country's water bodies (WFD)</p> <p>Number of incidences of eutrophication and or water pollution</p> <p>Number of forest fires</p> <p>Number of incident responses – e.g., following flooding, fire, invasive species occurrence etc</p> <p>Protected Freshwater Species</p> <p>Protected Bird Species – BOCCI</p>	<ol style="list-style-type: none"> 1 DAFM Midterm Review 2 The Status of EU Protected Habitats and Species in Ireland Article 17 Report (Department of Housing, Local Government and Heritage) 3 Monitoring of the effects of forestry related project development required under separate processes (EIA, AA) 4 Department of Housing, Local Government and Heritage report of the implementation of the measures contained in the Habitats Directive - as required by Article 17 of the Directive 5 Updates to National Red List Check List 6 Monitoring related to the IPFS such as: Main species (flora and fauna) that applicants of afforestation schemes seek to promote, monitoring of land use of statutory and non-statutory designated sites during the course of the Plan, land use change due to the IPFS relative to pre-plan and likely baseline evolution, water quality of catchments where IPFS work takes place against WFD targets, monitoring performance against total hectares of broadleaf woodlands thinned, the prevalence of tree disease, pests, and invasive species and the performance against any targets set out in the IPFS 7 Monitoring of the effects of forestry related project development required under separate processes (EIA, AA) 8 Fish Habitat and ecology surveys 9 Targeted Local Catchment Assessments 10 Monitoring related to the IPFS such as: Main species (flora and fauna) that applicants of afforestation schemes seek to promote, monitoring of land use of statutory and non-statutory designated sites during the course of the Plan, land use change due to the IPFS relative to pre-plan and likely baseline evolution, water quality of catchments where IPFS work takes place against WFD targets, monitoring performance against total hectares of broadleaf 	<ol style="list-style-type: none"> 1 DAFM, quarterly to yearly basis 2 DHLGH, every 6 years 3 In accordance with the monitoring provisions of EIA/ AA 4 Department of Housing, Local Government and Heritage (DHLGH) Every 6 years 5 NPWS, varies 6 DAFM, varies 7 In accordance with the monitoring provisions of EIA/ AA 8 IFI, varies 9 LAWPRO Catchment Scientists, varies 10 DAFM, varies 11 Local Authorities, continuously 12 Coillte, varies 13 EPA, varies 14 EPA every 4 years 15 EPA, continuously 16 EPA, continuously 17 DAFM continually with an annual report submitted to EU Commission 18 DAFM, varies 19 Inland Fisheries Ireland, varies 20 Birdwatch Ireland, every 6 years

	<p>human interaction in forested areas, and any development- such as carparks, public toilets etc within forests have the potential to negatively affect biodiversity through potential contamination, clearance and/or disturbance</p> <p>A range of Interventions, Measures and Actions have also been identified, for the purposes of this assessment, as having the potential to result in ‘uncertain’ effects on biodiversity This means that in the worst-case scenario there is potential for further negative environmental effects to occur The SEA monitoring measures outlined have been developed to also take these potential negative effects into account</p>		<p>woodlands thinned, the prevalence of tree disease, pests, and invasive species and the performance against any targets set out in the IPFS</p> <p>11 Monitoring related to relevant Local Area Plans and County/City Development Plans</p> <p>12 Coillte mapping resurveys</p> <p>13 Corinne mapping resurveys</p> <p>14 EPA State of the Environment Report 2020</p> <p>15 Ireland’s National Water Framework Directive Monitoring Programme, 2019-2021</p> <p>16 EPA Water Quality of Ireland 2020 Report</p> <p>17 Records of Forest Fires</p> <p>18 Monitoring related to the IPFS such as: Main species (flora and fauna) that applicants of afforestation schemes seek to promote, monitoring of land use of statutory and non-statutory designated sites during the course of the Plan, land use change due to the IPFS relative to pre-plan and likely baseline evolution, water quality of catchments where IPFS work takes place against WFD targets, monitoring performance against total hectares of broadleaf woodlands thinned, the prevalence of tree disease, pests, and invasive species and the performance against any targets set out in the IPFS</p> <p>19 Inland Fisheries Ireland – Protected Freshwater Species – Atlantic Salmon etc – trends in protected freshwater species, population, distribution, health etc</p> <p>20 Birds of Conservation Concern Ireland – Monitoring by Birdwatch Ireland on status, distribution, population etc</p>	
Population and Human Health	<p>While no definitive likely negative effects on population and human health have been identified in the assessment, a number of ‘uncertain’ effects have been identified This means that in the worst-case scenario there is potential for negative environmental effects to occur with respect to population and human health</p>	<p>Changes in trends in perceived health status</p> <p>Census population data</p> <p>Number of health and safety incidents among forest workers</p> <p>Number of new and or improved recreational facilities and or routes related to the forest industry</p> <p>Number of people utilising forests for amenity and recreational purposes</p> <p>Number of public rights of way lost through recreational forest areas</p>	<p>1 CSO Census Reports</p> <p>2 HSA - Farmers’ Health and Wellbeing Report and Review of Work-Related Fatalities in Agriculture in Ireland</p> <p>3 Research and Monitoring carried out for the Irish Forestry and Recreation Report and Forest Statistics 2021 Report</p> <p>4 Monitoring related to the IPFS such as: Main species (flora and fauna) that applicants of afforestation schemes seek to promote,</p>	<p>1 Central Statistics Office, every 6 years</p> <p>2 Health Safety Authority (HSA), continuously</p> <p>3 DAFM, COFORD, NPWS and Coillte, varies</p> <p>4 DAFM, varies</p> <p>5 In accordance with the monitoring provisions of EIA/ AA</p>

	The SEA monitoring measures outlined have been developed to take these potential negative effects into account	Number of forests planted for drinking water source protection	<p>monitoring of land use of statutory and non-statutory designated sites during the course of the Plan, land use change due to the IPFS relative to pre-plan and likely baseline evolution, water quality of catchments where IPFS work takes place against WFD targets, monitoring performance against total hectares of broadleaf woodlands thinned, the prevalence of tree disease, pests, and invasive species and the performance against any targets set out in the IPFS</p> <p>5 Monitoring of the effects of project developments required under separate processes (EIA, AA)</p> <p>6 Monitoring related to relevant Local Area Plans and County/City Development Plans or RSES's, particularly LAP Quarterly Reviews</p> <p>7 Irish Water and National Federation of Group Water Schemes water quality monitoring and Source Protection Plans, EPA drinking water quality monitoring</p>	<p>6 In accordance with the monitoring provisions of the lower-level plans Quarterly review basis</p> <p>7 EPA annual reports</p>
Land and Soil	<p>Measure 1,2,3,4 of Intervention 3 and Action 47 has the potential to result in negative effects on land and soil during the construction of the new road infrastructure in forests</p> <p>For Action 43 and Action 64, it is assumed, for the purpose of this assessment that the 'redesign measures' outlined in this Action, refer to an increase in forest cover within a particular area and or layout of peatland A negative effect on land and soil is identified in that, afforestation on peatlands is likely to disrupt the natural characteristics of peat soil and the surrounding water bodies If considered appropriate, sub-standard forestry operations have the potential to result in erosion, landslides,</p>	<p>Economic growth statistics for individuals working in the forestry industry</p> <p>Rates of unemployment per County</p> <p>Number of individuals working in the forestry sector</p> <p>Incidences of pollution events related to forestry</p> <p>Erosion and sedimentation rates of soils in forests and surrounding areas</p> <p>Nitrogen deposition rates</p> <p>Acidification rates of soils in forest areas</p> <p>Number of hectares forested annually</p> <p>Number of tree-felling licences granted</p> <p>Area of land subject to illegal deforestation</p> <p>The number of non-compliances with licence conditions following post licence felling inspections</p> <p>Number and condition of designated geological features</p> <p>Rates of forestry creation and forestry related developments e.g., forest roads and construction, where permitted and appropriate</p>	<p>1 Research and Monitoring carried out for the Irish Forestry and the Economy Report and Forest Statistics 2021 Report</p> <p>2 CSO Census Reports</p> <p>3 EPA State of the Environment Report 2020</p> <p>4 Monitoring related to the IPFS such as: Main species (flora and fauna) that applicants of afforestation schemes seek to promote, monitoring of land use of statutory and non-statutory designated sites during the course of the Plan, land use change due to the IPFS relative to pre-plan and likely baseline evolution, water quality of catchments where IPFS work takes place against WFD targets, monitoring performance against total hectares of broadleaf woodlands thinned, the prevalence of tree disease, pests, and invasive species and the performance against any targets set out in the IPFS</p> <p>5 Monitoring related to the IPFS such as: Main species (flora and fauna) that applicants of afforestation schemes seek to promote, monitoring of land use of statutory and non-statutory designated sites during the course of the</p>	<p>1 DAFM, COFORD, NPWS and Coillte, varies</p> <p>2 Central Statistics Office, every 6 years</p> <p>3 EPA every 4 years</p> <p>4 DAFM, varies</p> <p>5 DAFM, continuously</p> <p>6 In accordance with the monitoring provisions of EIA/ AA</p> <p>7 GSI, varies</p> <p>8 DAFM, continuously</p> <p>9 DAFM, quarterly to yearly basis</p> <p>10 In accordance with the monitoring provisions of EIA/ AA</p>

	<p>compaction, contamination, losses of soil organic matter, erosion, soil sealing, leaching, and changes in soil biodiversity</p> <p>Measure 2, Measure 3 and Measure 4 of Intervention 6, as well as Actions 15, 71, 74, 76 and 85 of this Intervention relate to the provision of forest amenities and facilities in existing forests. Increased human interaction in forested areas, and any development- such as carparks, public toilets etc within forests have the potential to negatively affect land and soil through potential contamination, clearance and/or disturbance</p>		<p>Plan, land use change due to the IPFS relative to pre-plan and likely baseline evolution, water quality of catchments where IPFS work takes place against WFD targets, monitoring performance against total hectares of broadleaf woodlands thinned, the prevalence of tree disease, pests, and invasive species and the performance against any targets set out in the IPFS</p> <p>6 Monitoring of the effects of project developments required under separate processes (EIA, AA)</p> <p>7 Monitoring for Geological Survey Irelands (GSI) Database</p> <p>8 Monitoring related to the IPFS such as: Main species (flora and fauna) that applicants of afforestation schemes seek to promote, monitoring of land use of statutory and non-statutory designated sites during the course of the Plan, land use change due to the IPFS relative to pre-plan and likely baseline evolution, water quality of catchments where IPFS work takes place against WFD targets, monitoring performance against total hectares of broadleaf woodlands thinned, the prevalence of tree disease, pests, and invasive species and the performance against any targets set out in the IPFS</p> <p>9 DAFM Mid-term review</p> <p>10 Monitoring of the effects of project developments required under separate processes (EIA, AA)</p>	
Water	<p>Measure 1,2,3 and 4 of Intervention 3 as well as Action 47 have the potential to result in negative effects on water during the construction of the new road infrastructure in forests</p> <p>Measure 6 of Intervention 3 has the potential to result in negative effects on water as a result of the construction of temporary water crossings,</p>	<p>Proportion of water bodies in forestry catchments meeting their WFD Ecological Status objectives, as reported by the EPA Water Monitoring Programme for the WFD and waterbodies where forestry is identified as a significant pressure</p> <p>The number of waterbodies that have deteriorated in ecological status or chemical status</p> <p>Status of aquatic habitats and species</p> <p>Number of significant pollution events recorded</p> <p>Compliance of surface waters with national and international standards</p> <p>Number of forestry related pollution incidences</p> <p>Area planted for water protection</p>	<p>1 Ireland's National Water Framework Directive Monitoring Programme, 2019-2021 River Basin Management Plan for Ireland 2018 -2021 (2022 – 2027)</p> <p>2 The Status of EU Protected Habitats and Species in Ireland Report (Department of Housing, Local Government and Heritage)</p> <p>3 EPA Water Quality of Ireland 2020 Report</p> <p>4 EPA State of the Environment Report 2020</p> <p>5 Monitoring related to the IPFS such as: Main species (flora and fauna) that applicants of afforestation schemes seek to promote, monitoring of land use of statutory and non-</p>	<p>1 EPA, continuously</p> <p>2 EPA, continuously</p> <p>3 DHLGH, every 6 years</p> <p>4 EPA, continuously</p> <p>5 EPA, every 4 years</p> <p>6 DAFM, continuously</p> <p>7 OPW, every 3 years</p> <p>8 DAFM, continuous</p> <p>9 EPA Catchment Unit, DHLGH and relevant local authorities, varies</p> <p>10 DAFM, twice annually, spring and autumn</p>

	<p>through potential contamination or disturbance of the water or riverbanks at the location of the crossings</p> <p>For Action 43 and 46, it is assumed, for the purpose of this assessment that the 'redesign measures' outlined in this Action, refer to an increase in forest cover within a particular area and or layout of peatland. A negative effect on water is identified in that, afforestation on peatlands is likely to disrupt the natural characteristics of peat soil and the surrounding water bodies. Soil contamination can result in leeching, and potential eutrophication of waters.</p> <p>Measure 2, Measure 3 and Measure 4 of Intervention 6, as well as Actions 15, 71, 74, 76 and 85 of this Intervention relate to the provision of forest amenities and facilities in existing forests. Increased human interaction in forested areas, and any development- such as carparks, public toilets etc. within forests have the potential to negatively affect water through potential contamination, clearance and/or disturbance.</p>	<p>Annual costs of forest damage related to flood events</p> <p>Past flood risk events in or around forest areas</p> <p>Areas planted as a natural water retention measure/nature based solution</p>	<p>statutory designated sites during the course of the Plan, land use change due to the IPFS relative to pre-plan and likely baseline evolution, water quality of catchments where IPFS work takes place against WFD targets, monitoring performance against total hectares of broadleaf woodlands thinned, the prevalence of tree disease, pests, and invasive species and the performance against any targets set out in the IPFS</p> <p>6 Ireland's National Water Framework Directive Monitoring Programme, DAFM monitoring</p> <p>7 Monitoring in the Review of Flood Risk Management Plans 2021</p> <p>8 DAFM Flood risk and natural damages monitoring in forests</p> <p>9 Monitoring for the EPA Catchments Unit and Local Authority Waters Programme</p> <p>10 DAFM water monitoring of eight heavily forested waterbodies</p>	
Air, Noise and Climate	<p>While no definitive likely negative effects on air, noise and climate have been identified in the assessment, a number of 'uncertain' effects have been identified. This means that in the worst-case scenario there is potential for</p>	<p>Air Quality Monitoring Result in Ireland</p> <p>Forestry related traffic, transport and vehicular survey data</p> <p>Compliance with national Air Quality Standards (AQS)</p> <p>Area of forest cover</p> <p>Annual afforestation targets for Ireland</p>	<p>1 Monitoring in the Air Quality for Ireland 2020 Report</p> <p>2 Monitoring related to the IPFS such as: Main species (flora and fauna) that applicants of afforestation schemes seek to promote, monitoring of land use of statutory and non-statutory designated sites during the course of the Plan, land use change due to the IPFS relative to</p>	<p>1 EPA, continuously</p> <p>2 DAFM, continuously</p> <p>3 EPA, continuous</p> <p>4 EPA, every 4 years</p> <p>5 DAFM, continuous</p> <p>6 SEAI, varies</p> <p>7 EPA reports sectorally on an annual basis</p>

	negative environmental effects to occur with respect to air, noise and climate. The SEA monitoring measures outlined have been developed to take these potential negative effects into account	Types of climate change-resilient tree species incorporated into the Plan area Rates of energy and or renewable energy consumption Promotion of renewable sources related to forestry e.g., use of forest-based renewable energy sources for heat and construction works GHG emission reductions over the Plan period Greenhouse gas emissions from permitted Forestry operations and developments Traffic surveys for forestry operations Noise monitoring data from licensed forestry operations Onsite dust monitoring of forestry operations	pre-plan and likely baseline evolution, water quality of catchments where IPFS work takes place against WFD targets, monitoring performance against total hectares of broadleaf woodlands thinned, the prevalence of tree disease, pests, and invasive species and the performance against any targets set out in the IPFS 3 Air Quality Monitoring Stations around Ireland 4 EPA State of the Environment Report 2020 5 Monitoring related to the IPFS such as: Main species (flora and fauna) that applicants of afforestation schemes seek to promote, monitoring of land use of statutory and non-statutory designated sites during the course of the Plan, land use change due to the IPFS relative to pre-plan and likely baseline evolution, water quality of catchments where IPFS work takes place against WFD targets, monitoring performance against total hectares of broadleaf woodlands thinned, the prevalence of tree disease, pests, and invasive species and the performance against any targets set out in the IPFS 6 Sustainable Energy Authority of Ireland (SEAI) - Monitoring for Sustainable Biomass Fuels in Ireland 7 EPA Greenhouse Gas Emissions Report 8 EPA Climate Change Projections 9 Monitoring of the IPFS, its measures, actions and performance against any targets set out in the IPFS Including measures relating to the creation of forest roads amongst traffic and transport data related to forestry operations 10 EPA State of the Environment Report 11 Monitoring of the effects of project development required under separate processes (EIA, AA) 12 Monitoring related to relevant Local Area Plans and County/City Development Plans or RSES's 13 Monitoring of the effects of forestry projects and or development required under separate processes (EIA, AA)	8 EPA, varies 9 DAFM, continuous 10 EPA, every 4 years 11 In accordance with the monitoring provisions of EIA/ AA 12 In accordance with the monitoring provisions of the lower-level plans 13 In accordance with the monitoring provisions if stipulated as a result of an EIA/ AA
Archaeological, Architectural	While no definitive likely negative effects on	Number of entries to the Record of Monuments and Places, and the immediate setting of these entries	1 Registers of nationally protected sites and structures	1 NPWS (National Parks and Wildlife Services),

<p>and Cultural Heritage</p>	<p>archaeological architectural and cultural heritage have been identified in the assessment, a number of 'uncertain' effects have been identified. This means that in the worst-case scenario there is potential for negative environmental effects to occur with respect to archaeological architectural and cultural heritage. The SEA monitoring measures outlined have been developed to take these potential negative effects into account.</p>	<p>including their relationships with forestry projects, forest areas and the surrounding landscape. Archaeological Impact Assessments related to forest creation and or development, and or the number and types of archaeological investigations undertaken. Educational facilities and or opportunities to promote awareness of woodland-related natural and cultural heritage. Range and extent of areas of heritage potential related to forest areas and or forestry development. Number of uninhabited and derelict structures in forest areas, identified through the processing of licence and scheme applications.</p>	<ol style="list-style-type: none"> 2 The National Inventory of Architectural Heritage 3 Monitoring of the effects of forestry projects and or development required under separate processes (EIA, SEA AA) 4 Monitoring related to relevant Local Area Plans and County/City Development Plans or RSES's 5 An Bord Pleanala Planning Records for Ireland 6 DAFM Mid-term Review 7 Monitoring of IPFS, its measures, actions and performance against any targets set out in the IPFS, particularly relating to cultural heritage in forest areas including the built environment and settings; archaeological recorded and unrecorded monuments, architectural (Protected Structures, Architectural Conservation Areas, vernacular buildings, materials and urban fabric) and manmade landscape features 8 Registers of nationally protected sites and structures 9 The National Inventory of Architectural Heritage 10 Monitoring of the effects of forestry projects and or development required under separate processes (EIA, AA) 11 Monitoring related to relevant Local Area Plans and County/City Development Plans or RSES's 12 Monitoring of IPFS, its measures, actions and performance against any targets set out in the IPFS, particularly relating to cultural heritage in forest areas including the built environment and settings; archaeological recorded and unrecorded monuments, architectural (Protected Structures, Architectural Conservation Areas, vernacular buildings, materials and urban fabric) and manmade landscape features 	<p>NMS (National Monuments Service), UNESCO, continually</p> <ol style="list-style-type: none"> 2 The Department of Housing, Local Government and Heritage are responsible for monitoring the conditions of, recording the presence of, and conserving Ireland's protected sites on a routine basis 3 In accordance with the monitoring provisions of EIA/ SEA/AA 4 In accordance with the monitoring provisions of the lower-level plans 5 Planning records from An Bord Pleanala or relevant County Council Authority should be reviewed and recorded at least at the plan min-term review stage (3 years). Assessment and recording of trends are conducted on an annual basis where possible 6 DAFM, quarterly to yearly basis 7 DAFM, continuous 8 NPWS (National Parks and Wildlife Services), NMS (National Monuments Service), UNESCO, continually 9 The Department of Housing, Local Government and Heritage are responsible for monitoring the conditions of, recording the presence of, and
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				<p>conserving Ireland's protected sites on a routine basis</p> <p>10 In accordance with the monitoring provisions of EIA/ AA</p> <p>11 In accordance with the monitoring provisions of the lower-level plans</p> <p>12 DAFM, continuous</p>
Landscape and Visual	<p>While no definitive likely negative effects on landscape and visual have been identified in the assessment, a number of 'uncertain' effects have been identified. This means that in the worst-case scenario there is potential for negative environmental effects to occur with respect to landscape and visual. The SEA monitoring measures outlined have been developed to take these potential negative effects into account.</p>	<p>Compliance with planning and or licensing conditions relating to landscape and forestry creation and or development</p> <p>The number of Forestry Appeals Committee (FAC) cases raised where landscape or visual issues are mentioned in relation to instances of afforestation, felling, forest road works and or aerial fertilisation</p> <p>Rates of forestry development within designated landscapes</p> <p>Rates of forest developments and planting</p> <p>Percentage change related to forestry creation and or development</p>	<ol style="list-style-type: none"> 1 Monitoring of IPFS, its measures, actions and performance against any targets set out in the IPFS 2 An Bord Pleanala Planning Records 3 Monitoring related to relevant Local Area Plans and County/City Development Plans or RSES's 4 Monitoring of the effects of forestry projects and or development required under separate processes (EIA, AA) 5 Monitoring of Forestry Appeals Committee (FAC) cases submitted 6 Monitoring of IPFS, its measures, actions and performance against any targets set out in the IPFS 7 Monitoring related to relevant Local Area Plans and County/City Development Plans or RSES's e.g., Landscape Character Assessments as part of County Development Plans 8 Monitoring of IPFS, its measures, actions and performance against any targets set out in the IPFS, particularly relating to forest creation and or development 9 Coillte mapping resurveys 10 Corrine mapping resurveys 	<ol style="list-style-type: none"> 1 DAFM, continuous 2 Planning records from An Bord Pleanala or relevant County Council Authority should be reviewed and recorded at least at the plan min-term review stage (3 years) Assessment and recording of trends are conducted on an annual basis where possible 3 In accordance with the monitoring provisions of the lower-level plans 4 In accordance with the monitoring provisions of EIA/ AA 5 DAFM, continually 6 DAFM, continuous 7 In accordance with the monitoring provisions of the lower-level plans – Relevant Local Authorities, continuously 8 DAFM, continuous 9 Coillte, varies 10 DAFM, Coillte and the EPA, varies
Material Assets	<p>While no definitive likely negative effects on material assets have been identified in the assessment, a number of 'uncertain' effects have been</p>	<p>Statistics on the quantity of forest products exported</p> <p>Achievement of Ireland's renewable energy targets and increased use of biomass as a renewable energy source</p> <p>Employment Statistics for the forestry Sector</p> <p>Number of modern apprenticeships</p>	<ol style="list-style-type: none"> 1 Research and Monitoring carried out for the Irish Forestry and the Economy Report and Forest Statistics 2021 Report 	<ol style="list-style-type: none"> 1 DAFM, COFORD, NPWS and Coillte, varies 2 SEAI, varies

	<p>identified This means that in the worst-case scenario there is potential for negative environmental effects to occur with respect to material assets The SEA monitoring measures outlined have been developed to take these potential negative effects into account</p>	<p>Amount of forest products available and the value of and or revenue of products Amount of biomass used for renewable energy generation in Ireland annually Location and/or level of forestry related infrastructure including forest roads forestry related innovation and technological advancements, and the success rates of such Rate of waste disposal related to forestry going to landfill statistics</p>	<p>2 Sustainable Energy Authority of Ireland (SEAI) - Monitoring for Sustainable Biomass Fuels in Ireland 3 Teagasc - Apprenticeship programmes in collaboration with Consortium Groups 4 Monitoring of the IPFS, its measures, actions and performance against any targets set out in the IPFS, particularly relating to forest-based products, renewable energy sources and forestry related GHG emissions 5 Research and Monitoring carried out for the Irish Forests and Renewable Energy Report and Forest Statistics 2021 Report 6 Monitoring of the effects of forestry creation and or related developments required under separate processes (EIA, AA) 7 Monitoring related to relevant Local Area Plans and County/City Development Plans or RSES's An Bord Pleanala/Relevant County Council Planning Records 9 Monitoring of the IPFS, its measures, actions and performance against any targets set out in the IPFS, particularly relating to forestry related technological and innovative developments and or upgrades 10 EPA National Waste Statistics Summary Report 11 EPA State of the Environment Report 2020 12 DAFM Mid-term review</p>	<p>3 DAFM, Teagasc and Consortium Group, continually 4 DAFM, continuous 5 DAFM, COFORD, NPWS and Coillte, varies 6 In accordance with the monitoring provisions of EIA/ AA 7 In accordance with the monitoring provisions of the lower-level plans 8 Planning records from An Bord Pleanala or relevant County Council Authority should be reviewed and recorded at least at the plan min-term review stage (3 years) Assessment and recording of trends are conducted on an annual basis where possible 9 DAFM, continuous 10 EPA, annually 11 EPA, every 4 years 12 DAFM, quarterly to yearly basis</p>
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3. Appropriate Assessment

Stage 1 AA (Screening) was undertaken by DAFM to identify if the potential for effects of implementing the IFSIP on the conservation status of designated Natura 2000 sites within the sphere of influence of the plan (or project). It was determined as part of this screening that there was potential for significant effects and/or in-combination effects on European sites as a result of implementing the IFSIP. A Natura Impact Report was subsequently prepared.

4. Final Appraisal: How Environmental Considerations were integrated into the IFSIP

This Section summarises how environmental considerations were integrated into the adopted IFSIP, throughout the SEA process.

The SEA process for the IFSIP ensured the integration of environmental considerations as follows:

- Undertaking the SEA in parallel with the IFSIP;
- Undertaking the SEA with close regular contact between the IFSIP team and the SEA team;
- Issuing the Scoping Report to the Environmental Authorities for comments on key environmental issues and the proposed scope of the SEA at the earliest possible stage of the IFSIP preparation; and
- Carrying out a full assessment of the environmental effects of the IFSIP and recommending and making changes to the IFSIP as a result.

Identification of environmental constraints

As described in **Section 2.4**, the SEA team undertook an assessment of baseline environmental conditions of the IFSIP area, with reference to biodiversity, population and human health, land and soil, water, air and climate, heritage, landscape, and material assets. This information was used to focus the SEA objectives, develop alternatives, and assess positive and negative impacts associated with the implementation of the proposed IFSIP. An Environmental Sensitivity Map was prepared to enable this assessment and to influence alternatives discussions and assessment of policies.

The IFSIP and SEA ER took into account the most up to date data which included, findings of the 2020 State of the Environment Report (EPA, 2020) were integrated into the SEA Environmental Report, amongst a large amount of forestry documentation, including but not limited to, Forests, Products and People Ireland's forest policy – a renewed vision (DAFM, 2014) and Forestry Statistics 2021 (DAFM, 2021).

SEA Scoping

As described in **Section 2.3**, the SEA Scoping was a key part of the assessment process as it provided information to allow consultation with defined statutory bodies and environmental authorities on the scope and level of detail to be considered and incorporated at an early stage in the assessment.

Refer to **Table 4.4** in **Appendix B** for the submissions received during the scoping consultation and how they were responded to and incorporated into the SEA ER and IFSIP.

Assessment of alternatives

The SEA team worked with DAFM from the outset to assist DAFM in becoming familiar with the process. The SEA team issued DAFM the EPA Guidance on Developing and Assessing Alternatives in SEA, as well as some examples from similar plans in the public domain.

Both the SEA team and DAFM acknowledged that the 'Do Nothing' scenario would not be a reasonable alternative to undertake and that DAFM needed to develop a number of other scenarios related to the

alternative levels of ambition with which would satisfy the objectives of the overarching Forestry Strategy and Vision Statement.

As discussed in Section 2.5.3, the IFSIP is the enabler for the Forest Strategy. It provides a detailed plan for the implementation of the Forest Strategy in the short-term, including including Actions, Measures and planned Interventions with the proposed allocation of funds to each priority area. ~~planned interventions with the proposed allocation of funds to each priority area.~~

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Thus, prior to the consideration of alternatives for the IFSIP, a number of different scenarios for the Forest Strategy were first considered, including:

- Scenario 1 - A shared national approach is not achieved ('Do-Nothing')
- Scenario 2 - New Principles/ Shared Vision being applied with only modest planting levels happening ('Do- Minimal')
- Scenario 3 - High Level of Ambition ('Do-Something')

Following consideration of the above scenarios, it was decided that Scenario 3 was the most ambitious and preferred plausible scenario. The Forest Strategy was developed on this basis.

Once the Forest Strategy was developed, a range of further alternatives for how this high level of ambition would be delivered via the IFSIP were then considered. The alternatives of which included:

- Alternative 1: Do Nothing
- Alternative 2: Continue with the current Forestry Programme Measures (Forestry Programme 2014-2020 (extended to end 2022))
- Alternative 3: Preparation of a new ambitious IFSIP and its inclusive Forest Action Plan and Forestry Programme of Measures and Interventions.

The environmental baseline and objectives were used to identify key sensitivities and inform development of the alternatives and ultimately the assessment of the preferred alternative.

Aims and Commitments

As this was the first IFSIP and IFS combination prepared by DAFM, the SEA team worked closely with DAFM to develop the 'Interventions, Measures and Actions' included in the Forest Action Plan and Forestry Programme within the IFSIP. The SEA team advised DAFM to look to their 2050 Shared National Vision document, as well as their Target Review of their current Forestry Programme, amongst Project Woodland's Regulatory Review Report by Philip Lee, in the first instance to try to determine the environmental goals and overarching objectives with which DAFM are committed to. The SEA team advised that these goals and overarching objectives should be reflected in the IFSIP through its Forest Action Plan and Forestry Programme, as appropriate. The SEA team also worked with DAFM to develop wording for the Interventions, Measures and Actions included in the IFSIP's Forestry Programme and Forest Action Plan.

Proposed mitigation measures

Mitigation measures were proposed to address negative environmental impacts identified during the assessment process. These included amendments to the wording of Interventions, Measures and Actions in the IFSIP's Forestry Programme and Action Plan.

The SEA team worked closely with DAFM in the development of the mitigation measures outlined in the SEA ER. The SEA team advised DAFM on the importance of ensuring that the mitigation measures proposed in the SEA ER were incorporated into the IFSIP, in so far as possible. The SEA team had numerous discussions with DAFM regarding mitigation measures. Following review of submissions received during consultation, DAFM reviewed and updated the IFSIP to ensure that its commitments to the implementation of mitigation were as definitive as possible.

Required environmental monitoring programme

A monitoring programme has been developed based on the indicators (noted in **Section 6** of the Environmental Report) in order to track progress towards achieving strategic environmental objectives and reaching targets, enabling positive and negative impacts on the environment to be measured.

The indicators have been developed to illustrate changes that would be attributable to the implementation of the IFSIP.

Following review of submissions received during consultation, the monitoring programme was reviewed and updated to provide greater information on monitoring sources, responsibilities, and timeframes.

Consultation

Further to the SEA Scoping consultation, the SEA Environmental Report, the Natura Impact Statement (from the Appropriate Assessment Process) and the IFSIP were put on wider display on the DAFM website.

All submission received during consultation are outlined in Appendix C, including commentary on how these were responded to.

Appendix A - Relevant Mitigation from DAFM Documents

Table 4.1 Summary of relevant mitigation from DAFM documents

Measures/Actions Category	Specific Measures/Actions	Relevant Guidance Documents/ Standards	Relevant Mitigation Measures	Aspect of Environment to which they relate
Afforestation/ Reforestation/Forest Creation/ Reconstitution/Any new Planting	Intervention 1 (Measure 1, 2), Intervention 2 (Measure 1, 2,3) Intervention 7 (Measure 1,2,3) Intervention 8 (Measure 1) Action 8 Action 9 Action 10 Action 30 Action 50 Action 51 Action 52 Action 53 Action 54 Action 55 Action 57 Action 76	Environmental Requirements for Afforestation Forestry Standards Manual Forest Creation Silvicultural Standards	All of the mandatory requirements set out in the full suite of DAFM documents, such as 'Environmental Requirements for Afforestation' (DAFM, 2016) Land Types for Afforestation (DAFM, 2015) and the Forestry Standards Manual (DAFM, 2015) must be complied with Including, but not limited to: When assessing a site for Forest Creation, a simple walkover soil survey is needed to identify the soil type(s) present For native forest creation, each new forest must reflect the appropriate native forest type (or types) identified during the application process as being the most ecologically appropriate for the site The site must be capable of supporting the vigorous growth and sustainable long-term development of suitable species and FT for the site Restrictions relating to land type, soil, elevation, aspect, shell marl, flooding and other site factors, as set out in the Forestry Schemes Manual 1 and the Land Types for Afforestation, apply GPC 1 and 2 land categories are not eligible for grant aid under Forestry Programme 2023-2027 Afforestation is regulated under Forestry Act, 2014 (and any Act that succeeds or replaces that Act) Several ASAs also overlap with Freshwater Pearl Mussel (FPM) catchments Native Forests FT1, 2 and 3 applications must incorporate appropriate measures to ensure that no silt, nutrients or herbicides enter receiving waters This is a key requirement within FPM catchments The Forestry and FPM Requirements must be applied All tree species proposed for planting under Native Forests FT1, 2 and 3 Scenario 1 to 6 must be: (i) native to the island of Ireland; (ii) representative of the native woodland type or types being promoted on site; and (iii) acceptable to DAFM The spacing of 2.0 m x 1.5 m is required for FT1, 2, 3 and 6, giving a planting density of 3,300 trees / ha The spacing of 2.0m x 2.0m is required for FT4,7,10,11 and 12 These specifications are aimed at promoting rapid establishment and the development of a vibrant emerging canopy in those areas planted Any variation on the above requirements regarding species mix, density, composition and layout, must be agreed in advance with DAFM Policies on plant density spacings may be changed as directed by DAFM Exclusion of ash due to ash dieback disease (Hymenoscyphus fraxineus), as set out in Forest Service Circular 04/2013 In the context of Ireland's special Protected Zone status with respect to specific harmful forest pests and diseases, plants of those species acceptable under FT 1 – 12 must be purchased from	Biodiversity, Land and Soil, Water, Archaeology, Landscape and Visual, Population and Human Health

Measures/Actions Category	Specific Measures/Actions	Relevant Guidance Documents/ Standards	Relevant Mitigation Measures	Aspect of Environment to which they relate
			<p>nurseries / brokers registered under the EU Plant Health Regulations, and must be accompanied by a valid EU Plant Passport where applicable, to certify the absence of the relevant pests and diseases</p> <p>Registered Forester must assess the site risk and identifying appropriate options</p> <p>Assess the site (both in-field and desk-based, using MapViewer on iNET);</p> <p>Identify the level of risk associated with the site (or parts thereof) regarding the potential for sediment and nutrient release and other negative impacts, arising from: the nature, size and location of the project (including all operations and ancillary works) over the establishment period and the potential for in-combination effects with other plans and projects. Select the appropriate option (or combination of options) that match the level of risk identified, drawing from a list of forestry operations, practices and measures ('options') set for each type of forestry development (as set out under S I 191 of 2017). Appropriate ancillary options must also be selected</p> <p>Applicants are encouraged to seek ecological input early in the design stage in situations where one or more of these scenarios apply, and to tailor any subsequent application accordingly before submission to DAFM</p> <p>In relation to setbacks from dwellings, setback planting is encouraged within the 30m to 60m zone, if agreed to by the neighbouring dweller</p> <p>Minimum setback, as measured from the surfaced edge of the public road: 10 metre for broadleaves and 20m for conifers, (average, within any one application) (For conifer plots, note the additional requirement regarding edge planting)</p> <p>The Registered Forester must assess the potential risk of sedimentation and nutrient runoff entering into 'receiving waters' (aquatic zones (streams, rivers, lakes)), both during afforestation establishment phase. Forest management must continue to assess sedimentation and nutrient runoff throughout the remainder of the rotation and adapt the forest design and planned operations accordingly</p> <p>Ensure that an adequate contingency plan is prepared. This plan must clearly inform operators how to react and who to contact, should an unexpected event arise that may create a risk to the environment, e.g. a period of intense rainfall, an accidental spillage of chemicals, the discovery of an unidentified archaeological site, monument or object. The plan should be readily available onsite and all operators should be made familiar with its content</p> <p>The Registered Forester must ensure that all operators are aware of the importance of any environmental setbacks required onsite, their location and extent, and what is and is not permitted within them. An environmental setback must not be used for any forest operation or for any other purpose which could compromise its protective function, or which could damage</p>	

Measures/Actions Category	Specific Measures/Actions	Relevant Guidance Documents/ Standards	Relevant Mitigation Measures	Aspect of Environment to which they relate
			<p>the environmental feature or sensitivity being protected Minimum environmental setbacks to be applied are set out in the Environmental Requirements for Afforestation</p> <p>Where afforestation is approved near known or suspected archaeological sites and monuments or other important built heritage structures or features, to seek to ensure that: (i) appropriate exclusion zones, fencing, access paths and other relevant measures are determined and required by condition to be incorporated into the project design; (ii) provision is made so there is an appropriate response should any previously unrecorded archaeological site, monument, object, structure or feature be discovered during site work; and (iii) any approved design is sympathetic to and provides an appropriate visual setting for such sites, monuments, structures or features</p> <p>The minimum environmental setbacks set out in the Environmental Requirements for Afforestation should be applied, unless conditions specify otherwise</p> <p>Existing access routes to an archaeological site must be left unplanted and undisturbed, and must be left open for pedestrian access by archaeological officials throughout the rotation If there is no existing access route, leave an unplanted 4 metre wide route suitable for pedestrian access from the direction of the nearest public road, forest road or track</p> <p>An Archaeological Assessment / Archaeological Impact Statement is required for sites where it is determined that there is a significantly elevated potential for impacts on known or suspected archaeological sites and monuments or other important built heritage structures or features</p> <p>The Registered Forester should consult with the relevant County Development Plan (both Draft and Final Plans), which will identify areas of particular landscape sensitivity, important views and considered suitability for afforestation The Registered Forester should also view the site from various vantage points and approaches, to identify how best to design the forest</p> <p>Monitor to ensure the successful establishment of forest edge planting and environmental setback planting (where undertaken) and maintain trees as appropriate (e.g., vegetation management, replacement of mortalities, adjustment, and eventual removal of tree shelters) until the trees are established and free of vegetation competition or browsing pressure</p> <p>Retain hedgerows, existing veteran trees, earth banks and stone walls unless required for access</p> <p>Under Irish legislation, EIA is mandatory for the following forestry projects:</p> <p>Initial afforestation which would involve an area of 50 hectares or more pursuant to Regulation 13(2)(a) of the Forestry Regulations 2017 (S I 191 of 2017) Where EIA is not mandatory, regard should be had to Section 11(d)(i) of the Forestry Act 2014, Regulation 13(2)(c) Forestry Regulations 2017, and Part 2 of Schedule 5 of the Planning and Development Regulations 2001, as amended and an EIA Screening carried out, as required</p>	

Measures/Actions Category	Specific Measures/Actions	Relevant Guidance Documents/ Standards	Relevant Mitigation Measures	Aspect of Environment to which they relate
			<p>An appropriate ecological assessment is required in sites where the habitat of Annex I bird species or Annex II species occur or are likely to occur to investigate the potential for where they occur</p> <p>Each site being assessed for suitability must, amongst other things, undergo a preliminary soil investigation by a Registered Forester</p> <p>Afforestation will be restricted to native tree species in the Top 8 Freshwater Pearl Mussel Catchments, namely: Bundorragha, Caragh, Corrib, Cumberagh, Dawros, Kerry Blackwater, Leannan and Ownagappul</p> <p>The DAFM shall take cognisance of the EPA programme of water monitoring, particularly in the 233 waterbodies where forestry is identified as a pressure and will engage with the Local Authorities Water Monitoring Programme (LAWPRO) Local Catchment Assessments (LCA) In addition, DAFM will undertake a programme of water monitoring using biological indicators in heavily forested waterbodies</p> <p>Consideration should be given to timing of ecological surveys</p> <p>The Native Tree Area scheme will not follow the pre-approval process of the existing afforestation scheme. Direct entry to the scheme will apply, using the same approach that is employed with agri-environmental schemes. The scheme has been designed to avoid and minimise potential impacts from the outset using the best available information and by applying pre-emptive measures. These generic measures are mandatory in nature for all areas to be included in the scheme. They will not be proposed on a farm-by-farm basis by applying site specific conditions. Pre-emptive measures have been introduced to ensure that tree planting works are undertaken in a legally compliant and sustainable manner. These measures are applied in the form of two distinct stages; Stage 1: Scheme Eligibility Map and Stage 2: Scheme Pre-Emptive Measures</p>	
Forest Management/ Forestry Operations including Felling and Thinning	<p>Intervention 3 (Measure 6)</p> <p>Intervention 4 (Measure 1, 2, 3, 4, 5, 6, 7, 8)</p> <p>Action 11</p> <p>Action 15</p> <p>Action 26</p> <p>Action 27</p> <p>Action 28</p>	<p>Forestry Standards Manual</p> <p>Standards for felling and Reforestation</p> <p>Forestry and Freshwater Pearl Mussel Requirements</p>	<p>All of the mandatory requirements set out in the full suite of DAFM documents, such as 'Environmental Requirements for Afforestation' (DAFM, 2016) Land Types for Afforestation (DAFM, 2015) and the Forestry Standards Manual (DAFM, 2015) must be complied with including, but not limited to:</p> <p>Sediment control and management measures must take account of rainfall levels and the possible likelihood of rainfall deluge and flash-flood events</p> <p>Where trees are required to be removed (e.g., to facilitate the erection of a fence), a felling licence may be necessary</p> <p>Apply fertiliser manually after cultivation to afforestation sites, avoiding drains, all environmental setbacks, areas within 20 metres of aquatic zones, and waterlogged areas</p>	<p>Biodiversity, Land and Soil, Water, Archaeology, Population and Human Health, Landscape and Visual</p>

Measures/Actions Category	Specific Measures/Actions	Relevant Guidance Documents/ Standards	Relevant Mitigation Measures	Aspect of Environment to which they relate
	Action 29		All existing fences and boundaries must be to a standard that can exclude domestic stock and protect the growing crop	
	Action 33			
	Action 34		When selecting the most appropriate / preferred forestry option(s), the following must be considered:	
	Action 35		No commercial conifer afforestation is envisaged within close proximity to aquatic zones within the Plan's area on sites deemed to be highly sensitive in nature. On such sites, afforestation will be excluded or limited to the creation of new native forest under FT1,2 and 3	
	Action 36			
	Action 37		A reduced or no-thin policy may be needed where certain site conditions exist (e.g., high water table, high exposure) which elevate the risk of windblow and subsequent sediment release. Any area proposed for clearfelling will need to be assessed individually and an appropriate harvesting plan put in place. In most cases, it is anticipated that standard harvesting machinery will be used to clearfell the majority of existing sites, with alternative options (such as manual felling and cable extraction) considered for more sensitive sites or parts of sites.	
	Action 39			
	Action 41			
	Action 42			
	Action 45		Careful consideration is required regarding the most appropriate post-clearfell option or combination of options, using the Reforestation Objective system set out in the Felling & Reforestation Policy.	
	Action 49			
	Action 56		The aerial fertilisation of forests requires a licence from the Minister for Agriculture, Food & the Marine under S I 191 of 2017. As a general policy, forest owners should assume that this activity will not be permitted in any of the 27 FPM Catchments.	
	Action 59			
	Action 60		Aerial Fertilisation shall not carry out aerial fertilisation in the period from 1 September to 31 March of the following year.	
	Action 61			
	Action 62		Adhere to all setback outlined in S I 191 of 2017 when carrying out Aerial Fertilisation.	
	Action 63		Plan extraction routes to avoid exclusion zones for water, archaeology and onsite habitats.	
	Action 64		Before the commencement of any works, all machine drivers and other operators should be fully aware of any environmental sensitivities onsite, and the relevant standards that apply. For example, operators must be made aware of the location of any exclusion zones for water, onsite habitats and biodiversity features, and archaeological features, and what they entail for operations. All operators must also be familiar with the content of the Harvest Plan and the Contingency Plan. Contingency Plan must clearly inform all machine drivers and other operators how to act and who to contact, should an unexpected event arise that may create a risk to the environment. Examples include an accidental fuel spillage or the discovery of an unidentified archaeological site or artefact.	

Measures/Actions Category	Specific Measures/Actions	Relevant Guidance Documents/ Standards	Relevant Mitigation Measures	Aspect of Environment to which they relate
			<p>Exclusion zones at harvesting stage, where not otherwise specified as an archaeological condition of the felling licence, will be the minimum setbacks for archaeological sites, monuments, important built heritage structures or features</p> <p>The treatment and reporting of the discovery of archaeological finds during harvesting or at reforestation stage should be as per the specifications in Section 3.8 (page 44) of the Environmental Requirements for Afforestation (December 2016)</p> <p>Store and prepare all chemicals, urea, fuel and machine oils at a dry, elevated location onsite at least 50 metres from the nearest aquatic zone and at least 20 m from the nearest relevant watercourse. Do not utilise water, habitat or archaeological setbacks for this purpose</p> <p>Similarly, undertake all machine refuelling, maintenance and repair at a dry, elevated location onsite at least 50 metres from the nearest aquatic zone and at least 20 m from the nearest relevant watercourse. Do not utilise water, habitat or archaeological setbacks for this purpose</p> <p>Collect spent oils and remove for correct offsite disposal</p> <p>All of the mandatory requirements set out in the full suite of DAFM documents, such as the Forestry Standards Manual (DAFM, 2015) and the Standards for Felling and Reforestation (DAFM, 2019) must be complied with. Including, but not limited to:</p> <p>Sediment must be prevented from entering aquatic zones. This is achieved by adherence to Environmental Requirements for Afforestation, Standards for Felling and Reforestation and any site-specific measures that may also be required</p> <p>In relation to setbacks from dwellings, setback planting is encouraged within the 30m to 60m zone, if agreed to by the neighbouring dweller</p> <p>Minimum setback, as measured from the surfaced edge of the public road: 10 metre broadleaves and 20m for conifers (average, within any one application) (For conifer plots, note the additional requirement regarding edge planting)</p> <p>If vegetation clearance with machine is required, particular care is needed to guard against soil damage, compaction, rutting or removal. Subsequent spraying may also be required, using approved herbicide appropriate to the target vegetation</p> <p>Where trees are required to be removed (e.g., to facilitate the erection of a fence), a felling licence may be necessary</p> <p>Good site hygiene and biosecurity controls will be employed to prevent the introduction and spread of invasive alien species (e.g., rhododendron, Japanese knotweed) by thoroughly checking/washing vehicles prior to entering and leaving the project site</p>	

Measures/Actions Category	Specific Measures/Actions	Relevant Guidance Documents/ Standards	Relevant Mitigation Measures	Aspect of Environment to which they relate
			<p>Minimise the crossing of drains during felling and extraction, and limit machine activity to brushed extraction racks</p> <p>Where felling operations adjoin public roads, appropriate safety signs should be in place to alert the public, including road users. Close off the forest (or parts of, if large) to users, if utilised for recreation</p> <p>Where practical and feasible and with consideration to other environmental receptors, access to forest land should select the least visually sensitive route, particularly in areas of high landscape sensitivity. Existing access routes and crossing points should be used when present and suitable</p> <p>The felling and replanting of forests damaged by storms, fire, pests or diseases should take appropriate cognisance of underlying environmental receptors such as water quality, habitats and species, archaeology and landscape</p> <p>The potential of operations to cause disturbance should be considered and where possible, effected in the timing of operations</p> <p>All forest operations within areas of high-water sensitivity (such as Freshwater Pearl Mussel catchments and high-status objective waterbodies) must be planned and managed with a particular regard to the protection of water quality, aquatic ecosystems and species</p> <p>Archaeological monitoring of specified areas at initial afforestation or reforestation stage by an independent archaeological consultant retained by the Applicant or the Registered Forester is required where it is determined that there is an elevated potential for impacts on known or suspected archaeological sites and monuments or other important built heritage structures or features in those areas</p> <p>Trees within archaeological exclusion zones should only be felled following the preparation by an archaeologist or other suitably qualified environmental professional, in conjunction with a forester or arborist, of a plan outlining the most appropriate means to fell and remove trees from on or around the monument</p> <p>Where required, bio-security measures shall be adopted on sites where there is known or high risk of pest, disease or invasive species; including cleaning vehicles regularly, contained wheel wash zones and foot wash areas and cleaning equipment of all organic debris to avoid the spread and/or introduction of non-native invasive species, pests and diseases from site to site</p> <p>Prior to operations commencing, all machine operators and other site personnel will be appropriately briefed by the appointed Works Manager, Registered Forester or Site Ecologist, on the specific sensitivities of the site and on all relevant conditions, including the location of all exclusion zones and environmental setbacks</p>	

Measures/Actions Category	Specific Measures/Actions	Relevant Guidance Documents/ Standards	Relevant Mitigation Measures	Aspect of Environment to which they relate
Use of Forests for Amenity, Recreation or Education	Intervention 6 (Measure 1, 2, 3, 4) Action: See Action 16 Action 65 Action 66 Action 67		<p>All of the mandatory requirements set out in the full suite of DAFM documents, such as 'Environmental Requirements for Afforestation' (DAFM, 2016) Land Types for Afforestation (DAFM, 2015) and the Forestry Standards Manual (DAFM, 2015) must be complied with Including, but not limited to:</p> <p>All of the mandatory requirements set out in the full suite of DAFM documents must be complied with</p> <p>Ensure that proposals for forestry projects or infrastructure incorporate natural features, where feasible</p> <p>Ensure that forest amenity and recreational facilities are managed in a way which ensures that there is no potential for significant adverse environmental effects</p>	Biodiversity, Population and Human Health, Land and Soil, Water, Air Quality and Climate
Forest Road Works	Intervention 3, Measure 1,2,3, 4 Action 47	Forest Road Manual Forestry Standards Manual	<p>All of the mandatory requirements set out in the full suite of DAFM documents, such as 'Environmental Requirements for Afforestation' (DAFM, 2016) Land Types for Afforestation (DAFM, 2015) and the Forestry Standards Manual (DAFM, 2015) must be complied with Including, but not limited to:</p> <p>All of the mandatory requirements set out in the full suite of DAFM documents must be complied with, (Forestry and Water Quality Guidelines still relevant here)</p> <p>Prior to the design or development of forest roads, regard should be had to the Forest Road Manual: Guidelines for the Design, Construction & Management of Forest Roads (COFORD, 2005)</p> <p>Under Irish legislation, EIA is mandatory for the following forestry projects:</p> <p>-private roads which would exceed 2,000 metres in length (S I 600 of 2001, as amended by S I 235 of 2008) and Regulation 13(2)(b) of S I 191 of 2017) Where EIA is not mandatory, regard should be had to Section 11(d)(i) of the Forestry Act 2014, Regulation 13(2)(d) Forestry Regulations 2017, and Part 2 of Schedule 5 of the Planning and Development Regulations 2001, as amended, and an EIA Screening carried out, as required</p> <p>The development of new forest roads should be subject to options assessment, where appropriate</p> <p>Access to forest land should select the least environmentally sensitive route and utilise existing access where available and suitable</p> <p>Archaeological monitoring of specified sections of a forest route by an independent archaeological consultant is required where it is determined that there is an elevated potential for impacts on known or suspected archaeological sites and monuments or other important built heritage structures or features in those sections</p>	Biodiversity, Land and Soil, Water, Archaeology, Population and Human Health

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			<p>The potential of operations to cause disturbance should be considered and where possible, reflected in the timing operations</p> <p>Alternative options such as lower density roading, temporary bridging and the adoption of alternative silvicultural systems, will be considered on case-by-case basis, on sites with acute water sensitivity</p> <p>Ensure that stream and river crossings constructed for forestry purposes are developed in compliance with the Coford Forest Road Manual and the Inland Fisheries Ireland Guidelines on the Protection of Fisheries During Construction In or Adjacent to Waters</p>	
best practice construction measures ⁵		<p>Forestry Standards Manual</p> <p>Standards for Felling and Reforestation</p> <p>Forest Road Manual</p>	<p>All of the mandatory requirements set out in the full suite of DAFM documents, such as 'Environmental Requirements for Afforestation' (DAFM, 2016) Land Types for Afforestation (DAFM, 2015) and the Forestry Standards Manual (DAFM, 2015) must be complied with including, but not limited to:</p> <p>Prior to the commencement of operations, install silt traps within existing forest drains that connect with aquatic zones, either directly or indirect through other relevant watercourses</p> <p>Minimise the crossing of drains during felling and extraction and restrict machine activity to brashed extraction racks and haulage routes</p> <p>Create and maintain dense mats of brash and branch wood on all machine routes, to avoid soil damage, erosion and sedimentation. Concentrate brash mats on primary routes and in sections crossing soils with a low bearing capacity. The junction of extraction paths and landing sites should also be supplied with a protective brash cover. Brash mats should be renewed when they become heavily used and worn, and no longer function effectively</p> <p>Store, fuel and machine oils at a dry, elevated location onsite at least 50 metres from the nearest aquatic zone and at least 20 m from the nearest relevant watercourse. Do not utilise water, habitat or archaeological setbacks for this purpose</p> <p>Similarly, undertake all machine refuelling, maintenance and repair at a dry, elevated location onsite at least 50 metres from the nearest aquatic zone and at least 20 m from the nearest relevant watercourse. Do not utilise water, habitat or archaeological setbacks for this purpose</p> <p>Collect spent oils and remove for correct offsite disposal</p> <p>Areas recognised for their geological importance should be taken into consideration during the layout, design and construction of forest roads</p>	

⁵ Where 'construction' is taken to mean any works involving machinery, traffic movements, noise and air emissions etc

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			<p>The construction of new drains, or changing the shape of drains, should not take place in exclusion zones and should only enter aquatic buffer zones where the site is flat (or almost so) and will not result in sediment entering the aquatic zone</p> <p>Special construction works will only apply to permanent bridges and large culverts greater than or equal to 1.0 metre in diameter, and will be limited to situations where the forest area served exceeds 5 hectares</p> <p>It should be noted that the approval of the Minister is required for all forest road works projects, whether grant aided or not</p> <p>Roading plans to be based on detailed surveys and environmental care principles that ensure that all environmentally sensitive locations are identified and appropriate design and construction techniques adopted</p> <p>Roads must not follow watercourses, crossings must be kept to a minimum and crossing structures (bridges, fords, etc) must not impede the waterflow</p> <p>Roadside drains should be provided to minimise the concentrations and velocity of runoff and ensure that water drains from the road surface</p> <p>Methods for the construction of forest roads and associated special construction works including the specification of machinery and ancillary equipment should be selected to promote efficient construction and minimise environmental impact</p> <p>Road construction should ideally be undertaken during summer periods when lower rainfall and drier soil conditions minimise the risk of erosion</p> <p>The refuelling and maintenance of machines must not take place close to sensitive sites in order to prevent spillage of fuel and oils from entering streams and watercourses. Forestry and Water Quality Guidelines require this work to be carried out at least 50 m from the nearest aquatic zone on a dry, elevated site</p> <p>All temporary bridging and road reinforcements will be subject to the appropriate assessment process and EIA process, where required, and located only where appropriate</p> <p>Crossing structures (bridges, fords, etc) must not impede the waterflow</p> <p>Machinery used in forest operations should be managed so as to minimise the potential for any offsite air, noise or vibration impacts</p> <p>Prior to operations commencing, all machine operators and other site personnel will be appropriately briefed by the appointed Works Manager, Registered Forester or Site Ecologist, on the specific sensitivities of the site and on all relevant conditions, including the location of all exclusion zones and environmental setbacks</p>	

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			<p>Where instream works are required, and to prevent the spread of freshwater invasive species and disease (e.g. Crayfish Plague, Zebra mussel, fishhook waterflea), any vehicles, tools and PPE directly involved in instream works, e.g. culvert for access purposes, are clean (disinfected and dried) and free of soil/sand/gravel and plant debris before entering and leaving the site</p> <p>Sediment must be prevented from entering aquatic zones. This is achieved by adherence to Environmental Requirements for Afforestation, Standards for Felling and Reforestation and any site-specific measures that may also be required</p> <p>Regularly check silt traps and silt fences, and maintain as required, to ensure their continued effectiveness throughout works</p> <p>If vegetation clearance with machine is required, particular care is needed to guard against soil damage, compaction, rutting or removal. Subsequent spraying may also be required, using approved herbicide appropriate to the target vegetation</p> <p>Where trees are required to be removed (e.g. to facilitate the erection of a fence), a felling licence may be necessary</p> <p>Good site hygiene and biosecurity controls will be employed to prevent the introduction and spread of invasive alien species (e.g. rhododendron, Japanese knotweed) by thoroughly checking/washing vehicles prior to entering and leaving the project site</p> <p>All forest operations within areas of high-water sensitivity (such as Freshwater Pearl Mussel catchments and high-status objective waterbodies) must be planned and managed with a particular regard to the protection of water quality, aquatic ecosystems and species</p> <p>Create and maintain dense mats of brash and branch wood on all machine routes where necessary, to avoid significant soil damage, erosion and sedimentation that will cause significant environmental impact in the absence of mitigation</p>	
Biodiversity Protection	All	<p>Environmental Requirements for Afforestation</p> <p>Forestry Standards Manual</p> <p>Standards for Felling and Reforestation</p> <p>Forest Establishment Silvicultural Standards</p>	<p>All of the mandatory requirements set out in the full suite of DAFM documents, such as 'Environmental Requirements for Afforestation' (DAFM, 2016) Land Types for Afforestation (DAFM, 2015) and the Forestry Standards Manual (DAFM, 2015) must be complied with. Including, but not limited to:</p> <p>Applicants are encouraged to seek ecological input early in the design stage in situations where one or more of these scenarios apply, and to tailor any subsequent application accordingly before submission to the DAFM</p> <p>The DAFM may require an ecological report assessing the habitat and its extent and identifying mitigation measures capable of ensuring that the project can take place in a manner compatible with the maintenance or restoration to a favourable conservation status of that habitat</p>	Biodiversity

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		Forestry and Freshwater Pearl Mussel Requirements	<p>If any unusual pest or disease is observed please immediately contact your local Forestry Inspector or Forest Health section</p> <p>Plants of the genera listed in Table 8 7 should only be purchased from nurseries registered under the EU Plant Health Regulations and the plants must be accompanied by a valid EU Plant Passport, where applicable, https://www.teagasc.ie/media/website/crops/forestry/advice/Standards-for-Felling-and-Reforestation.pdf</p> <p>Good Plant Protection Practice document sets out general principles of integrated pest management, which all professional users are required to follow</p> <p>Plants of those species acceptable FT1,2 and 3 and listed below should only be purchased from nurseries / brokers registered under the EU Plant Health Regulations, and must be accompanied by a valid EU Plant Passport, where applicable, to certify the absence of the relevant pests and diseases</p> <p>DAFM policy is to maintain a healthy forest environment by ensuring good management, and by identifying risks and maintaining a sustained commitment to measures that prevent the entry and establishment of destructive forest pests and diseases, including those which may impact negatively on native woodland</p> <p>The Native Woodland Establishment Framework incorporates changes introduced in Forest Service Circular 4/2013, taking account of the suspension of the grant aiding of ash planting in response to the Chalara fraxinea ash dieback disease</p> <p>Registered Forester must assess the site risk and identifying appropriate options</p> <p>assess the site (both in-field and desk-based, using MapViewer on iNET);</p> <p>identify the level of risk associated with the site (or parts thereof) regarding the potential for sediment and nutrient release and other negative impacts, arising from: the nature, size and location of the project (including all operations and ancillary works) over the short, medium and long term; and the potential for in-combination effects with other plans and projects; and then</p> <p>select the appropriate option (or combination of options) that match the level of risk identified, drawing from a list of forestry operations, practices and measures ('options') set for each type of forestry development (as set out under SI 191 of 2017) Appropriate ancillary options must also be selected</p> <p>All applications within the area of the Forestry & FPM Plan (as described in Table 2 2) will be subjected to 100% field inspection by District Forestry Inspectors throughout the lifetime of this Plan</p>	

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			<p>As part of the evaluation process, each application will undergo AA screening by DAFM under the AAP, to determine if there is a possibility of a significant effect on the conservation objective for FPM (and that for any other qualifying interest(s) listed for the SAC in question)</p> <p>In addition to the actions listed for forestry in the RBMP, the key principles guiding the DAFM's input into achieving the objectives of the RBMP are:</p> <ul style="list-style-type: none"> to safeguard water during all forestry operations; to restructure existing forests to reflect water sensitivities, where required; & to situate & design new woodlands & forests in a way that protects water quality <p>Using the WFD's 'source-pathway-receptor' model, reducing sources & breaking pathways are key</p> <p>The aim is to fully realise the significant role woodlands & forests can have in protecting & enhancing Ireland's waters & associated aquatic ecosystems</p> <p>The Framework will apply to all applications for S I 191 / 2017 licences (for afforestation, forest road construction)</p> <p>DAFM must undertake a 'screening' for appropriate assessment to evaluate if there is a possibility of the project – either alone or in combination with other plans and projects – having a significant effect on the conservation objectives and associated qualifying interests of any NATURA 2000 site</p> <p>Certain types of woody habitat (including areas of blackthorn scrub, pockets of high forest trees less than 0.1 ha in area, and hedgerows) can be maintained for biodiversity purposes</p> <p>An ABE of plot size should be mapped and recorded as a separate plot in the Certified Species Map legend Biodiversity plots must have a minimum width of 20 metres</p> <p>The submission of a BIO Map is required at pre-approval (Form 1) stage and at 1st instalment (Form 2) stage for the Afforestation Scheme and the Forest Road Scheme</p> <p>Where trees are required to be removed (e.g. to facilitate the erection of a fence), a felling licence may be necessary</p> <p>All existing fences and boundaries must be to a standard that can exclude domestic stock and protect the growing crop</p> <p>The Registered Forester must ensure that all operators are aware of the importance of any environmental setbacks required onsite, their location and extent, and what is and is not permitted within them. An environmental setback must not be used for any forest operation or</p>	

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			<p>for any other purpose which could compromise its protective function, or which could damage the environmental feature or sensitivity being protected</p> <p>Monitor and apply appropriate control to prevent the colonisation of setbacks by rhododendron and other invasive alien species</p> <p>The colonisation of the water setback with invasive species, in particular, Japanese knotweed, Himalayan balsam and rhododendron, is of significant concern regarding water quality</p> <p>Prior to operations commencing, all machine operators and other site personnel will be appropriately briefed by the appointed Works Manager, Registered Forester or Site Ecologist, on the specific sensitivities of the site and on all relevant conditions, including the location of all exclusion zones and environmental setbacks All operators must also be familiar with the content of the Harvest Plan and the Contingency Plan</p> <p>Before operations commence, identify exclusion zones along the edge of all aquatic zones, hotspots and water abstraction points, and mark this clearly on a site map</p> <p>Retain existing hedgerows and mature broadleaves onsite, where it is safe and appropriate to do so</p> <p>Regularly check silt traps and silt fences, and maintain as required, to ensure their continued effectiveness throughout works</p> <p>Setbacks from environmental receptors that may not have been installed at initial planting must be created at reforestation</p> <p>No commercial conifer afforestation is envisaged within close proximity within 30 metres to aquatic zones within the Plan's area on sites deemed to be highly sensitive in nature On such sites, afforestation will be excluded or limited to the creation of new native woodland under NWS Establishment</p>	
Planting on Peatlands	Action 43 and Action 64	<p>Environmental Requirements for Afforestation</p> <p>Forest Protection Guidelines Forest Service (2000) Department of the Marine and Natural Resources</p> <p>Forestry Standards Manual Department of Agriculture, Food and the</p>	<p>Minimum setback, as measured from the surfaced edge of the public road: 10 metre for broadleaves and 20m for conifers, (average, within any one application) (For conifer plots, note the additional requirement regarding edge planting)</p> <p>The Registered Forester must assess the potential risk of sedimentation and nutrient runoff entering into 'receiving waters' (aquatic zones (streams, rivers, lakes)), both during afforestation establishment phase Forest management must continue to assess sedimentation and nutrient runoff throughout the remainder of the rotation and adapt the forest design and planned operations accordingly</p> <p>Ensure that an adequate contingency plan is prepared This plan must clearly inform operators how to react and who to contact, should an unexpected event arise that may create a risk to the environment, e.g. a period of intense rainfall, an accidental spillage of chemicals, the discovery</p>	Population and Human Health, Biodiversity, Land and Soil, Water, Air and Climate,

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		<p>Marine Forest Service (2015)</p> <p>Standards for Felling and Reforestation, (2019), Department of Agriculture, Food and the Marine</p> <p>Land Types for Afforestation Forest Service (2015) Department of Agriculture, Food and the Marine</p> <p>Native Woodland Establishment GPC9 & GPC10 Silvicultural Standards Forest Service (2015) Department of Agriculture, Food and the Marine</p>	<p>of an unidentified archaeological site, monument or object The plan should be readily available onsite and all operators should be made familiar with its content</p> <p>The Registered Forester must ensure that all operators are aware of the importance of any environmental setbacks required onsite, their location and extent, and what is and is not permitted within them An environmental setback must not be used for any forest operation or for any other purpose which could compromise its protective function, or which could damage the environmental feature or sensitivity being protected Minimum environmental setbacks to be applied are set out in the Environmental Requirements for Afforestation</p> <p>Where afforestation is approved near known or suspected archaeological sites and monuments or other important built heritage structures or features, to seek to ensure that: (i) appropriate exclusion zones, fencing, access paths and other relevant measures are determined and required by condition to be incorporated into the project design; (ii) provision is made so there is an appropriate response should any previously unrecorded archaeological site, monument, object, structure or feature be discovered during site work; and (iii) any approved design is sympathetic to and provides an appropriate visual setting for such sites, monuments, structures or features</p> <p>The minimum environmental setbacks set out in the Environmental Requirements for Afforestation should be applied, unless conditions specify otherwise</p> <p>Existing access routes to an archaeological site must be left unplanted and undisturbed, and must be left open for pedestrian access by archaeological officials throughout the rotation If there is no existing access route, leave an unplanted 4 metre wide route suitable for pedestrian access from the direction of the nearest public road, forest road or track</p> <p>An Archaeological Assessment / Archaeological Impact Statement is required for sites where it is determined that there is a significantly elevated potential for impacts on known or suspected archaeological sites and monuments or other important built heritage structures or features</p> <p>Monitor to ensure the successful establishment of forest edge planting and environmental setback planting (where undertaken) and maintain trees as appropriate (e.g., vegetation management, replacement of mortalities, adjustment and eventual removal of tree shelters) until the trees are established and free of vegetation competition or browsing pressure</p> <p>Retain hedgerows, existing veteran trees, earth banks and stone walls unless required for access</p> <p>An appropriate ecological assessment is required in sites where the habitat of Annex I bird species or Annex II species occur or are likely to occur to investigate the potential for where they occur</p> <p>Each site being assessed for suitability must, amongst other things, undergo a preliminary soil investigation by a Registered Forester</p>	

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			<p>Afforestation will be restricted to native tree species in the Top 8 Freshwater Pearl Mussel Catchments, namely: Bundorragha, Caragh, Corrib, Cumberagh, Dawros, Kerry Blackwater, Leannan and Ownagappul</p> <p>The DAFM shall take cognisance of the EPA programme of water monitoring, particularly in the 233 waterbodies where forestry is identified as a pressure, and will engage with the Local Authorities Water Monitoring Programme (LAWPRO) Local Catchment Assessments (LCA) In addition, DAFM will undertake a programme of water monitoring using biological indicators in heavily forested waterbodies</p> <p>Consideration should be given to timing of ecological surveys</p>	
Protection of Water Resources	All	<p>Environmental Requirements for Afforestation</p> <p>Forestry Standards Manual</p> <p>Standards for Felling and Reforestation</p> <p>Forest Establishment Silvicultural Standards</p> <p>Woodland for Water: Creating new native woodlands to protect and enhance Irelands Water</p>	<p>If subsequently licensed, all afforestation must adhere to environmental requirements that include (in relation to water) mandatory water setbacks and other protective measures regarding cultivation, fertiliser application, and herbicide use</p> <p>Forest restructuring is also crucial to reshape the existing forest estate to take account of water and other environmental sensitivities This should be undertaken primarily at reforestation post-clearfell, when the replanting of the site can incorporate water setbacks, native woodland zones and hydrological restoration This ensures that the new rotation of the forest has a far more sensitive 'footprint' regarding water</p> <p>Ensure that an adequate contingency plan is prepared This plan must clearly inform operators how to react and who to contact, should an unexpected event arise that may create a risk to the environment, e.g. a period of intense rainfall or an accidental spillage of chemicals The plan should be readily available onsite and all operators should be made familiar with its content</p> <p>The Registered Forester must ensure that all operators are aware of the importance of any environmental setbacks required onsite, their location and extent, and what is and is not permitted within them An environmental setback must not be used for any forest operation or for any other purpose which could compromise its protective function, or which could damage the environmental feature or sensitivity being protected Water setback distances will vary depending on soil type, slope and the presence of environmental sensitivities such as freshwater pearl mussel or high status objective waterbodies</p> <p>Stop all drainage and cultivation operations during periods of rainfall, in situations where rainfall level and site conditions create the risk of sediment becoming mobilised onsite Operations can only recommence once an adequate period of time has elapsed for the risk to abate This safeguard is triggered by tracking weather forecasts and by contingency planning</p> <p>Match fertiliser type and application rate to specific plots – aim to achieve successful establishment with the minimal level of fertiliser input possible Do not apply fertiliser if it is not needed</p>	Water, Biodiversity, Population and Human Health

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			<p>The colonisation of the water setback with invasive species, in particular, Japanese knotweed, Himalayan balsam and rhododendron, is of significant concern regarding water quality</p> <p>Water sampling under the Acid Sensitivity Protocol for Afforestation is not required for DAFM afforestation applications within Acid Sensitive Areas (ASAs) that comprise Native Forest Establishment Ft 1, 2 and 3 or agroforestry</p> <p>Applications for afforestation approval (with or without grant aid) on sites located within certain 6 inch Ordnance Survey sheets designated as acid sensitive areas (see following pages for list) require a site-specific assessment of the acid sensitivity of watercourses. Sampling and analysis shall be carried out on at least four separate occasions within the period 1st February to the 31st May inclusive, with each sample taken at least 28 days apart</p> <p>Where site permitting, the required 20% broadleaf component within any afforestation project located within, or partially within, specified water sensitive areas may include a Native Forest Establishment plot (or plots) along sensitive sections of any watercourse adjoining or crossing the site, to enhance water protection</p> <p>Sediment must be prevented from entering aquatic zones. This is achieved by adherence to the Environmental Requirements for Afforestation, Standards for Felling and Reforestation, and with appropriate sections of this manual. Site-specific measures may also be required</p> <p>Fertiliser should not be discharged into a free-flowing drain, nor into a sediment trap</p> <p>Apply fertiliser manually after cultivation to afforestation sites, avoiding drains, all environmental setbacks, areas within 20 metres of aquatic zones, and waterlogged areas</p> <p>Before the commencement of any works, all machine drivers and other operators should be fully aware of any environmental sensitivities onsite, and the relevant standards and licence conditions that apply. For example, operators must be made aware of the location of any exclusion zones for water, onsite habitats and biodiversity features, and what they entail for operations. All operators must also be familiar with the content of the Harvest Plan and the Contingency Plan</p> <p>Before operations commence, identify exclusion zones along the edge of all aquatic zones, hotspots and water abstraction points, and mark this clearly on a site map</p> <p>Regarding aquatic zones, ensure banks remain undisturbed. No branches or debris are to enter the aquatic zone during operations. Immediately and with care, remove any branches that do fall in</p> <p>Prior to the commencement of operations, install silt traps within existing forest drains that connect with aquatic zones, either directly or indirect through other relevant watercourses</p>	

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			<p>Minimise the crossing of drains during felling and extraction, and restrict machine activity to brushed extraction racks and haulage routes</p> <p>Store and prepare all chemicals, urea, fuel and machine oils at a dry, elevated location onsite at east 50 metres from the nearest aquatic zone and at least 20 m from the nearest relevant</p> <p>Similarly, undertake all machine refuelling, maintenance and repair at a dry, elevated location onsite at least 50 metres from the nearest aquatic zone and at least 20 m from the nearest relevant watercourse Do not utilise water, habitat or archaeological setbacks for this purpose Collect spent oils and remove for correct offsite disposal</p> <p>Regularly check silt traps and silt fences, and maintain as required, to ensure their continued effectiveness throughout works</p> <p>Undertake regular visual checks of relevant watercourses (primarily at their outflow from the site) and adjoining aquatic zones, to confirm (or otherwise) that no sediment or silt discharge is arising from site works</p> <p>The general approach regarding the treatment of the natural riparian zone and DAFM-stipulated 10-25 metre wide aquatic buffer zone (ABZ)</p> <p>Details regarding the design and treatment of the water setback and the natural riparian zone should be site-specific Adopting the DAFM requirement as the minimum width, the actual width of the setback can be increased at various points along its length, to reflect factors that may heighten the risk of sedimentation at particular locations (e.g. natural hollows and other preferred flow paths, where water gravitates towards as it approaches the receiving watercourse) This will maximise the level of protection against the runoff of sediment and nutrients into the stream or river Varying the width of the setback (particularly in relation to sunlight) will also increase the biodiversity 'edge effect' between the setback and the native forest canopy</p> <p>In areas where the DAFM Forestry & Freshwater Pearl Mussel Requirements apply, a 25 metre wide setback is stipulated</p> <p>Activities within the setback may be subject to the agreement of Inland Fisheries Ireland and (where relevant) the National Parks & Wildlife Service</p> <p>Several ASAs also overlap with Freshwater Pearl Mussel (FPM) catchments Native Forest Establishment applications must incorporate appropriate measures to ensure that no silt, nutrients or herbicides enter receiving waters This is a key requirement within FPM catchments</p> <p>Permanent undisturbed water setback, 10-25 metres in width (or wider, if required), uncrossed by new drains & largely unplanted Can be widened at key locations onsite, where site</p>	

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			<p>hydrology & slope increase the vulnerability of receiving waters. Planting within 10 metres may be allowable in certain circumstances such as for alluvial woodland</p> <p>New native forest created under FT1 or FT2, 20 metres or greater in width & uncrossed by new drains. Can be widened at key locations onsite, where adjoining land use, site hydrology & slope increase the vulnerability of receiving waters</p> <p>Setback planting comprising single trees or small groups of suitable native riparian species of trees & shrubs strategically planted & maintained for bank stabilisation, dappled shading & as a food source for aquatic life</p> <p>Possible blocking of existing drains (with silt traps, slow-flow dams) to break existing pathways from source to the receiving watercourse, & to create pocket wetlands & settlement areas</p> <p>Native forest establishment has an overriding ecological focus. For example, site disturbance and inputs must be minimised, species selection must reflect the most appropriate native forest type for the site (based on site, drainage, elevation, etc.), and all forest reproductive material (seed, transplants, cuttings) used must come from suitable sources within Ireland (within limited practical exceptions)</p> <p>Generally, sites that flood are excluded from the Afforestation Scheme. However, native forest plots located on natural floodplains may be acceptable, where 1) the frequency of flooding and the inundation periods involved do not impede establishment and development; and 2) such plots form part of a larger application or a wider multi-site project developed with input from other statutory bodies and aimed at the strategic development of native woodland along a sensitive watercourse, for water protection</p> <p>Each project under FT1 or FT2 must promote the native forest type that would occur naturally on the site (or parts of the site). This framework uses location, soil and main habitats and vegetation to identify the most ecologically appropriate native woodland type</p> <p>All tree species proposed under FT1 or FT2 must be: (i) native to the island of Ireland; and (ii) appropriate to the native woodland type identified for promotion onsite (or parts thereof)</p> <p>Under FT1 or FT2, the identified woodland type should be realised with the minimal amount of site inputs (e.g., fertilisers) and disturbance (e.g., cultivation). The focus is on retaining natural site conditions and facilitating the emergence of the native forest type that would occur naturally on the site</p> <p>While standard fertiliser application is not accepted under FT1 or FT2, a once-off hand application at establishment (using slow release formulations) is allowed on marginal</p>	

Measures/Actions Category	Specific Measures/Actions	Relevant Guidance Documents/ Standards	Relevant Mitigation Measures	Aspect of Environment to which they relate
			<p>sites, in order to boost initial growth. However, this need is unlikely to arise on most sites where the Woodland for Water measure might be applied.</p> <p>Pre- and post-planting herbicide application must be kept to the minimum required to ensure success, and should be used together with other methods, e.g., planting with larger transplants.</p> <p>Herbicide application is not permitted within the water setback or within 20 metres of an aquatic zone, whichever is greatest. Limited exemptions may apply, where agreed by the relevant statutory body (e.g., stem injection to eliminate stream-side rhododendron, in order to tackle infestation and to reinstate natural vegetation).</p> <p>For Forest Types other than FT1, 2 or 3, wider setbacks are required for sites on peat soil or within the catchment area of a high ecological status (HES) objective waterbodies.</p> <p>Water setback planting can involve single or small irregular groups (5-10 trees) of native riparian species (birch, willow, and occasional alder and pedunculate oak) at strategic points within the water setback. This planting should not exceed 20% of the area of the water setback.</p> <p>Typically, trees are to be pit-planted. No cultivation is permitted within the water setback, but soil can be imported from outside the setback, and deposited to create individual planting positions, if required.</p> <p>Fertiliser application and vegetation management can be applied to establish setback planting, based on the following restrictions: Fertiliser application is limited to the manual application of an appropriate slow release formulation into the planting pit. Regarding vegetation management, herbicide use is prohibited. Use nonherbicide methods instead, such as trampling, mulches and mats.</p> <p>The Registered Forester must ensure that all operators are aware of the importance of the water setback, its location and extent, and what is and is not permitted within it. The marking out of the setback prior to site operations commencing is encouraged, to avoid incursions.</p> <p>Any planting carried out in the water setback must be monitored, and trees maintained as needed (e.g., vegetation management, replacement of mortalities, adjustment and eventual removal of tree shelters) until they are fully established and free of grazing/browsing pressure and vegetation competition.</p> <p>Ongoing monitoring and appropriate control is needed to prevent the colonisation of water setbacks by invasive species. In particular, Japanese knotweed, Himalayan balsam and rhododendron, are of significant concern regarding water quality. Where best practice involves herbicide use, consult with Inland Fisheries Ireland and other relevant bodies in advance. Controlling such species is difficult and expensive, and often requires a wider catchment approach for progress to be sustained.</p>	

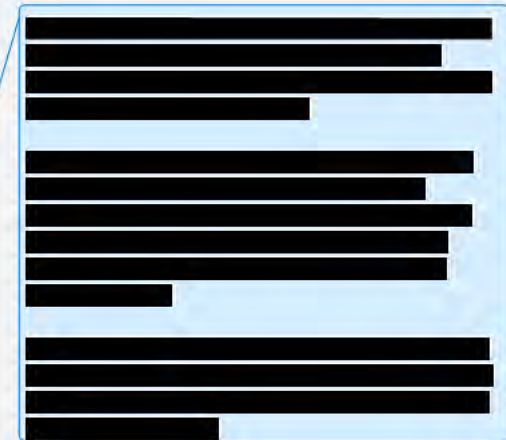
Measures/Actions Category	Specific Measures/Actions	Relevant Guidance Documents/ Standards	Relevant Mitigation Measures	Aspect of Environment to which they relate
			Periodic mowing and strimming of vegetation and subsequent removal of cuttings from the site, may be useful in reducing the build-up of nutrients in the water setback arising from its buffering role. Controlled grazing, with prior DAFM agreement, may also fulfil this role	

Table 4.2| Mitigation Measures as set out in the accompanying NIR (as they relate to proposed Intervention and Measures)

Intervention, Measure, Requirement	Pre-existing Mitigation within the draft IFSIP	Further Mitigation
Intervention 1 Forest Creation		
Overall Objective	<p>Within the Draft IFSIP, DAFM has included 'Identification of relevant baseline elements' with pertains to Statutory management requirements under Section 4 1 Forestry Act and Forestry Regulations "The Forestry Act 2014 and Forestry Regulations s the primary legislative framework for supporting the development and promotion of forestry in Ireland and set out the provisions for licensing (consent) for afforestation and forest road applications, aerial fertilisation licensing and felling licences. Landowners submitting applications for forestry licences must follow the requirements prescribed in the legislation which includes requirements for public consultation"</p> <p>Defined within are the required elements of an afforestation licence, including the requirement for AA Screening of all forestry licence applications</p> <p>The mandatory requirements relevant to the AA process found within the Draft IFSIP are:</p> <p>All initial afforestation applications are screened for appropriate assessment (AA) to determine whether the proposed project, individually or in combination with other plans and projects, is likely to have a significant effect on any European site (i.e., Natura 2000 sites), in view of the site's conservation objectives</p> <p>Afforestation applications within European sites (SAC or SPA) will only be approved if they are compatible with the conservation objectives of the European site and will not adversely affect the integrity of the site concerned</p> <p>The Minister has an obligation, pursuant to Regulation 20(3) of SI 191 of 2017 to refuse an application if, in his or her opinion, the proposed development is likely to have significant adverse impact on nature conservation</p> <p>Public authorities, in the exercise of their functions, insofar as the requirements of the Birds Directive and the Habitats Directive are relevant to those functions, shall—</p>	<p>Follow-up monitoring of effectiveness of measures implemented to avoid significant adverse effects where forests are created as part of Intervention 1 Forest Creation be carried out post forest creation</p>



Intervention, Measure, Requirement	Pre-existing Mitigation within the draft IFSIP	Further Mitigation
	<p>(a) take the appropriate steps to avoid, in candidate special protection areas, pollution and deterioration of habitats and any disturbances affecting the birds insofar as these would be significant in relation to the objectives of Article 4 of the Birds Directive;</p> <p>(b) outside those areas, strive to avoid pollution or deterioration of habitats;</p> <p>(c) take appropriate enforcement action;</p> <p>The schemes as applied, must be in compliance with the Forestry Act, 2014, S I 191 of 2017 (as amended) and existing forestry requirements, such as adherence to the standards set out in the Forestry Standards Manual, Environmental Requirements for Afforestation and the Land Types for Afforestation. These include specific requirements with regard to establishment, land types, environmental protection, forest design, a prescribed list of species/provenance and origin for the planting material used; and</p> <p>In lieu of the above requirements for all afforestation licence applications and considering that an afforestation licence is required for the Measures found within Intervention, it is not anticipated that Intervention 1 shall pose a likely significant effect on Natura 2000 sites and/or their QIs. With the implementation of the above, it is not anticipated that this objective shall pose any potential for likely significant effects to European sites.</p>	
Native Tree Area Scheme	<p>Mitigation currently in place for the Native tree Area Scheme are outlined below:</p> <p>The Native Tree Area Scheme has been developed to incentivise small scale planting without the requirement of an afforestation licence. Amendments to the Animal Health and Welfare and Forestry (Miscellaneous Provisions) Act 2022 has introduced Regulations to facilitate this scheme Pursuant to 22A:</p> <p>(1) The Minister may, for the purpose of enabling the State to pursue, and achieve, the transition to a low carbon, climate resilient, biodiversity rich and environmentally sustainable economy, provide by regulation for a scheme to facilitate the planting of native tree areas</p> <p>(2) Regulations under subsection (1) may—</p> <p>(a) subject to paragraph (b) and subsection (3), provide for the exemption of the planting of native tree areas, that would, but for such exemption, be subject to the requirements of section 22, from the requirements of that section,</p> <p>(b) prescribe conditions for an exemption under paragraph (a), having regard to—</p> <p>(i) the requirements of the environment and environmental law,</p> <p>(ii) the need for increased planting of native tree species,</p>	<p>Follow-up monitoring of effectiveness of measures implemented to avoid significant adverse effects where forests are created as part of Intervention 1 Forest Creation be carried out post forest creation</p>



Intervention, Measure, Requirement	Pre-existing Mitigation within the draft IFSIP	Further Mitigation
	<p>(iii) public safety,</p> <p>(iv) fire, pest or disease control, and</p> <p>(v) research and such other silvicultural requirements as the Minister considers appropriate,</p> <p>and</p> <p>(c) in relation to the scheme referred to in subsection (1)—</p> <p>(i) prescribe the terms and conditions of that scheme, having regard to such matters referred to in subparagraphs (i) to (v) of paragraph (b) and any other matters as the Minister considers relevant, and</p> <p>(ii) provide for the provision of native tree area grants for the planting of native tree areas</p> <p>(3) Regulations under subsection (1) shall provide that an exemption from the requirements of section 22 shall be granted only where, on the basis of objective information, the proposed native tree area is not likely to have a significant effect on a European site in view of the site conservation objectives, either individually or in combination with other plans or projects</p> <p>(4) In this section, 'European site' has the same meaning as it has in the European Communities (Birds and Natural Habitats) Regulations 2011 (S I No 477 of 2011) ",</p> <p>As a result of the aforementioned requirements set out for the Native Tree Area within Intervention 1, it is not anticipated that this Scheme shall pose a potential for likely significant effect on the Natura 2000 site network and/or QIs</p>	
Measure 1	<p>All measures within Intervention 1 are subject to requirements that are outlined above in the overall objective. All afforestation licences are required to adhere to and provide the following:</p> <p>All initial afforestation applications are screened for appropriate assessment (AA) to determine whether the proposed project, individually or in combination with other plans and projects, is likely to have a significant effect on any European site (i.e., Natura 2000 sites), in view of the site's conservation objectives</p> <p>Afforestation applications within European sites (SAC or SPA) will only be approved if they are compatible with the conservation objectives of the European site and will not adversely affect the integrity of the site concerned</p>	<p>Follow-up monitoring of effectiveness of measures implemented to avoid significant adverse effects where forests are created as part of Intervention 1 Forest Creation be carried out post forest creation</p>

Intervention, Measure, Requirement	Pre-existing Mitigation within the draft IFSIP	Further Mitigation
	<p>The Minister has an obligation, pursuant to Regulation 20(3) of SI 191 of 2017 to refuse an application if, in his or her opinion, the proposed development is likely to have significant adverse impact on nature conservation</p> <p>Public authorities, in the exercise of their functions, insofar as the requirements of the Birds Directive and the Habitats Directive are relevant to those functions, shall—</p> <p>(a) take the appropriate steps to avoid, in candidate special protection areas, pollution and deterioration of habitats and any disturbances affecting the birds insofar as these would be significant in relation to the objectives of Article 4 of the Birds Directive,</p> <p>(b) outside those areas, strive to avoid pollution or deterioration of habitats, and</p> <p>(c) take appropriate enforcement action</p> <p>The schemes as applied, must be in compliance with the Forestry Act, 2014, S I 191 of 2017 (as amended) and existing forestry requirements, such as adherence to the standards set out in the Forestry Standards Manual, Environmental Requirements for Afforestation and the Land Types for Afforestation. These include specific requirements with regard establishment, land types, environmental protection, forest design, a prescribed list of species/provenance and origin for the planting material used</p> <p>In lieu of the above requirements for all afforestation licence applications and considering that an afforestation licence is required for the Measures found within Intervention, it is not anticipated that Intervention 1 shall pose a likely significant effect on Natura 2000 sites and/or their QIs</p> <p>With the implementation of the above, it is not anticipated that this objective shall pose any potential for likely significant effects to European sites</p>	
Measure 3	<p>All measures within Intervention 1 are subject to requirements that are outlined above in the overall objective. All afforestation licences are required to adhere to and provide the following:</p> <p>The mandatory requirements relevant to the AA process found within the Draft IFSIP are:</p> <p>All initial afforestation applications are screened for appropriate assessment (AA) to determine whether the proposed project, individually or in combination with other plans and projects, is likely to have a significant effect on any European site (i.e., Natura 2000 sites), in view of the site's conservation objectives</p> <p>Afforestation applications within European sites (SAC or SPA) will only be approved if they are compatible with the conservation objectives of the European site and will not adversely affect the integrity of the site concerned</p>	<p>Follow-up monitoring of effectiveness of measures implemented to avoid significant adverse effects where forests are created as part of Intervention 1 Forest Creation be carried out post forest creation</p>

Intervention, Measure, Requirement	Pre-existing Mitigation within the draft IFSIP	Further Mitigation
	<p>The Minister has an obligation, pursuant to Regulation 20(3) of SI 191 of 2017 to refuse an application if, in his or her opinion, the proposed development is likely to have significant adverse impact on nature conservation</p> <p>Public authorities, in the exercise of their functions, insofar as the requirements of the Birds Directive and the Habitats Directive are relevant to those functions, shall—</p> <p>(a) take the appropriate steps to avoid, in candidate special protection areas, pollution and deterioration of habitats and any disturbances affecting the birds insofar as these would be significant in relation to the objectives of Article 4 of the Birds Directive,</p> <p>(b) outside those areas, strive to avoid pollution or deterioration of habitats, and</p> <p>(c) take appropriate enforcement action</p> <p>The schemes as applied, must be in compliance with the Forestry Act, 2014, S I 191 of 2017 (as amended) and existing forestry requirements, such as adherence to the standards set out in the Forestry Standards Manual, Environmental Requirements for Afforestation and the Land Types for Afforestation. These include specific requirements with regard establishment, land types, environmental protection, forest design, a prescribed list of species/provenance and origin for the planting material used</p> <p>In lieu of the above requirements for all afforestation licence applications and considering that an afforestation licence is required for the Measures found within Intervention, it is not anticipated that Intervention 1 shall pose a likely significant effect on Natura 2000 sites and/or their QIs</p> <p>With the implementation of the above, it is not anticipated that this objective shall pose any potential for likely significant effects to European sites</p>	
Intervention 2 –Agroforestry		
Overall Objective	<p>Within the overall objective for Intervention 2, the following mitigation is stated:</p> <p>“Specific requirements for this measure will vary for each of the three types of agroforestry system listed above. All mandatory and legal standards as set out in the Forestry Act 2014, the Forestry Regulations (SI No 191/2017 as amended), and specified by the Department for the establishment and management of forests in the Forestry Standards Manual will apply to this intervention”</p> <p>Pursuant to Part 8 of the Forestry Regulations (SI No 191/2017), the Protection of European sites, all applications for a forestry licence under sections 17 or 22 of the Principal Act shall be assessed as to whether they shall, individually or in combination with other projects or plans, have a likely significant effect on a European site i.e., Screening for Appropriate Assessment. As a result of the requirement for Screening for Appropriate Assessment and subsequent Stage 2 Appropriate Assessment, where</p>	<p>Follow-up monitoring of effectiveness of measures implemented to avoid significant adverse effects where agroforestry systems are created as part of Intervention 2 Creation of Agroforestry Systems be carried out post forest creation</p> <p>DAFM to integrate the recommendation of the Independent Regulatory Review and develop mandatory ‘no-go’ zones and ‘go-to’ or preferred areas for afforestation</p>

Intervention, Measure, Requirement	Pre-existing Mitigation within the draft IFSIP	Further Mitigation
	<p>necessary, it is not anticipated that any of the measures within Intervention 2 shall pose the potential for likely significant effects to European sites and/or their QIs</p> <p>With the implementation of the above, it is not anticipated that this objective shall pose any potential for likely significant effects to European sites</p>	
Measure 1 Silvopastoral Systems	<p>Within the overall objective for Intervention 2 (and all the measures within), the following mitigation is stated:</p> <p>“Specific requirements for this measure will vary for each of the three types of agroforestry system listed above. All mandatory and legal standards as set out in the Forestry Act 2014, the Forestry Regulations (SI No 191/2017 as amended), and specified by the Department for the establishment and management of forests in the Forestry Standards Manual will apply to this intervention”</p> <p>Pursuant to Part 8 of the Forestry Regulations (SI No 191/2017), the Protection of European sites, all applications for a forestry licence under sections 17 or 22 of the Principal Act shall be assessed as to whether they shall, individually or in combination with other projects or plans, have a likely significant effect on a European site i.e., Screening for Appropriate Assessment. As a result of the requirement for Screening for Appropriate Assessment and subsequent Stage 2 Appropriate Assessment, where necessary, it is not anticipated that any of the measures within Intervention 2 shall pose the potential for likely significant effects to European sites and/or their QIs</p> <p>With the implementation of the above, it is not anticipated that this objective shall pose any potential for likely significant effects to European sites</p>	<p>Follow-up monitoring of effectiveness of measures implemented to avoid significant adverse effects where agroforestry systems are created as part of Intervention 2 Creation of Agroforestry Systems be carried out post forest creation</p> <p>DAFM to integrate the recommendation of the Independent Regulatory Review and develop mandatory ‘no-go’ zones and ‘go-to’ or preferred areas for afforestation</p>
Requirement for Measure 1	<p>Within the overall objective for Intervention 2 (and all the measures within), the following mitigation is stated:</p> <p>“Specific requirements for this measure will vary for each of the three types of agroforestry system listed above. All mandatory and legal standards as set out in the Forestry Act 2014, the Forestry Regulations (SI No 191/2017 as amended), and specified by the Department for the establishment and management of forests in the Forestry Standards Manual will apply to this intervention”</p> <p>Pursuant to Part 8 of the Forestry Regulations (SI No 191/2017), the Protection of European sites, all applications for a forestry licence under sections 17 or 22 of the Principal Act shall be assessed as to whether they shall, individually or in combination with other projects or plans, have a likely significant effect on a European site i.e., Screening for Appropriate Assessment. As a result of the requirement for Screening for Appropriate Assessment and subsequent Stage 2 Appropriate Assessment, where necessary, it is not anticipated that any of the measures within Intervention 2 shall pose the potential for likely significant effects to European sites and/or their QIs</p>	<p>Where setback areas for grazing are to be examined on a case-by-case basis DAFM to integrate the recommendation of the Independent Regulatory Review to develop mandatory ‘no-go’ zones and ‘go-to’ or preferred areas for afforestation so as to avoid the potential for likely significant effects</p>

Intervention, Measure, Requirement	Pre-existing Mitigation within the draft IFSIP	Further Mitigation
	<p>With the implementation of the above, it is not anticipated that this objective shall pose any potential for likely significant effects to European sites</p>	
<p>Measure 2: Silvopastoral Systems Requirements</p>	<p>Within the overall objective for Intervention 2 (and all the measures within), the following mitigation is stated:</p> <p>“Specific requirements for this measure will vary for each of the three types of agroforestry system listed above. All mandatory and legal standards as set out in the Forestry Act 2014, the Forestry Regulations (SI No 191/2017 as amended), and specified by the Department for the establishment and management of forests in the Forestry Standards Manual will apply to this intervention”</p> <p>Pursuant to Part 8 of the Forestry Regulations (SI No 191/2017), the Protection of European sites, all applications for a forestry licence under sections 17 or 22 of the Principal Act shall be assessed as to whether they shall, individually or in combination with other projects or plans, have a likely significant effect on a European site i e , Screening for Appropriate Assessment. As a result of the requirement for Screening for Appropriate Assessment and subsequent Stage 2 Appropriate Assessment, where necessary, it is not anticipated that any of the measures within Intervention 2 shall pose the potential for likely significant effects to European sites and/or their QIs</p> <p>With the implementation of the above, it is not anticipated that this objective shall pose any potential for likely significant effects to European sites</p>	<p>Follow-up monitoring of effectiveness of measures implemented to avoid significant adverse effects where agroforestry systems are created as part of Intervention 2 Creation of Agroforestry Systems be carried out post forest creation</p> <p>DAFM to integrate the recommendation of the Independent Regulatory Review to develop mandatory of ‘no-go’ zones and ‘go-to’ or preferred areas for afforestation</p>
<p>Measure 3: Forest Gardening</p>	<p>Within the overall objective for Intervention 2 (and all the measures within), the following mitigation is stated:</p> <p>“Specific requirements for this measure will vary for each of the three types of agroforestry system listed above. All mandatory and legal standards as set out in the Forestry Act 2014, the Forestry Regulations (SI No 191/2017 as amended), and specified by the Department for the establishment and management of forests in the Forestry Standards Manual will apply to this intervention”</p> <p>Pursuant to Part 8 of the Forestry Regulations (SI No 191/2017), the Protection of European sites, all applications for a forestry licence under sections 17 or 22 of the Principal Act shall be assessed as to whether they shall, individually or in combination with other projects or plans, have a likely significant effect on a European site i e , Screening for Appropriate Assessment. As a result of the requirement for Screening for Appropriate Assessment and subsequent Stage 2 Appropriate Assessment, where necessary, it is not anticipated that any of the measures within Intervention 2 shall pose the potential for likely significant effects to European sites and/or their QIs</p> <p>With the implementation of the above, it is not anticipated that this objective shall pose any potential for likely significant effects to European sites</p>	<p>Follow-up monitoring of effectiveness of measures implemented to avoid significant adverse effects where agroforestry systems are created as part of Intervention 2 Creation of Agroforestry Systems be carried out post forest creation</p> <p>DAFM to integrate the recommendation of the Independent Regulatory Review to develop mandatory of ‘no-go’ zones and ‘go-to’ or preferred areas for afforestation</p>

Intervention, Measure, Requirement	Pre-existing Mitigation within the draft IFSIP	Further Mitigation
Intervention 3 – Infrastructure and Technology Investments		
Overall Objective	<p>Within the specific requirements for this Intervention and all measures within:</p> <p>All applications in relation to licensed activities that are part of this and all interventions will undergo a detailed project evaluation by the Department (via desk, field inspection (if required) and use of the GIS-based iFORIS system), referral to statutory consultees as required, AA Screening and Appropriate Assessment (where required) under the Habitats Directive, to ensure compatibility with the environment and to consider areas of habitat and species sensitivity within the project plan</p> <p>In assessing an application for a forestry licence, the Department is required to consider potential impacts across a range of issues and sensitivities. The following lists the primary components of the legal, regulatory and funding framework that apply:</p> <p>The Forestry Act 2014 (the Act) and the supplemental Forestry Regulation 2017 (SI No 191 of 2017)</p> <p>European Communities (Forest Consent & Assessment) Regulations 2010 (S I 558 of 2010), as amended</p> <p>European Union rules governing the Implementation Plan</p> <p>Legally protected species and habitats and associated designations (e.g., SAC, SPA, Natural Heritage Areas) and procedures (e.g., Appropriate Assessment)</p> <p>Water Framework Directive</p> <p>Legislation regarding archaeology and built heritage, including the National Monuments Acts</p> <p>DAFM requirements, procedures and protocols the Forestry Standards Manual; the relevant Forest Service Requirements and Guidelines including but not limited to Forestry & Archaeology Guidelines Forest Service (2000 Department of the Marine and Natural Resources Forest Harvesting & the Environment Guidelines Forest Service (2000 Department of the Marine and Natural Resources</p> <p>Given the requirement for the AA Screening and Appropriate Assessment (where required) as part of any and all licensed activities, it is not anticipated that any of the measures within Intervention 3 shall pose the potential for likely significant effects to European sites and/or their QIs</p>	<p>DAFM apply pollution prevention guidelines as a mandatory requirement for construction of any forest road type and for the decommissioning of any temporary structures</p> <p>DAFM to consider the recommendation within the Independent Regulatory Review of whether there is any category of forest road which might be considered lower risk, from an environmental and social perspective. Assuming there is, it would need to be verified through environmental assessment (using criteria set out in the SEA/EIA/Habitats and Water Framework Directives) that a forest road of that type or scale is objectively a low environmental risk, subject to any site-specific considerations, such that it merits a permit procedure involving less control than a full licence. In each case it will be necessary for a prior AA and EIA screening to be carried out before the works proceed, with the right of DAFM to intervene to require AA or EIA to be carried out</p> <p>DAFM to incorporate post-construction environmental monitoring of all forest road creation</p>
Specific Requirements for this Intervention	<p>Within the specific requirements for this Intervention, and all measures, within:</p> <p>All applications in relation to licensed activities that are part of this and all interventions will undergo a detailed project evaluation by the Department (via desk, field inspection</p>	

Intervention, Measure, Requirement	Pre-existing Mitigation within the draft IFSIP	Further Mitigation
	<p>(if required) and use of the GIS-based iFORIS system), referral to statutory consultees as required, AA Screening and Appropriate Assessment (where required) under the Habitats Directive, to ensure compatibility with the environment and to consider areas of habitat and species sensitivity within the project plan</p> <p>In assessing an application for a forestry licence, the Department is required to consider potential impacts across a range of issues and sensitivities. The following lists the primary components of the legal, regulatory and funding framework that apply:</p> <p>The Forestry Act 2014 (the Act) and the supplemental Forestry Regulation 2017 (SI No 191 of 2017)</p> <p>European Communities (Forest Consent & Assessment) Regulations 2010 (S I 558 of 2010), as amended</p> <p>European Union rules governing the Implementation Plan</p> <p>Legally protected species and habitats and associated designations (e.g., SAC, SPA, Natural Heritage Areas) and procedures (e.g., Appropriate Assessment)</p> <p>Water Framework Directive</p> <p>Legislation regarding archaeology and built heritage, including the National Monuments Acts</p> <p>DAFM requirements, procedures and protocols the Forestry Standards Manual; the relevant Forest Service Requirements and Guidelines including but not limited to Forestry & Archaeology Guidelines Forest Service (2000 Department of the Marine and Natural Resources) Forest Harvesting & the Environment Guidelines Forest Service (2000 Department of the Marine and Natural Resources)</p> <p>Given the requirement for the AA Screening and Appropriate Assessment (where required) as part of any and all licensed activities, it is not anticipated that any of the measures within Intervention 3 shall pose the potential for likely significant effects to European sites and/or their QIs</p>	
Measure 1: Forest Road Scheme	<p>Within the specific requirements for this Intervention and all measures within:</p> <p>All applications in relation to licensed activities that are part of this and all interventions will undergo a detailed project evaluation by the Department (via desk, field inspection (if required) and use of the GIS-based iFORIS system), referral to statutory consultees as required, AA Screening and Appropriate Assessment (where required) under the Habitats Directive, to ensure compatibility with the environment and to consider areas of habitat and species sensitivity within the project plan</p>	<p>DAFM to apply pollution prevention guidelines as a mandatory requirement for construction of any forest road type and for the decommissioning of any temporary structures</p> <p>DAFM to integrate the recommendation of the Independent Regulatory Review of whether there is any category of forest road which might be considered lower risk, from an environmental and social perspective. Assuming there is, it would need to be verified through environmental assessment (using criteria set out in the SEA/EIA/Habitats and Water Framework Directives) that a forest</p>

Intervention, Measure, Requirement	Pre-existing Mitigation within the draft IFSIP	Further Mitigation
	<p>In assessing an application for a forestry licence, the Department is required to consider potential impacts across a range of issues and sensitivities. The following lists the primary components of the legal, regulatory and funding framework that apply:</p> <p>The Forestry Act 2014 (the Act) and the supplemental Forestry Regulation 2017 (SI No 191 of 2017)</p> <p>European Communities (Forest Consent & Assessment) Regulations 2010 (SI 558 of 2010), as amended</p> <p>European Union rules governing the Implementation Plan</p> <p>Legally protected species and habitats and associated designations (e.g., SAC, SPA, Natural Heritage Areas) and procedures (e.g., Appropriate Assessment)</p> <p>Water Framework Directive</p> <p>Legislation regarding archaeology and built heritage, including the National Monuments Acts</p> <p>DAFM requirements, procedures and protocols the Forestry Standards Manual; the relevant Forest Service Requirements and Guidelines including but not limited to Forestry & Archaeology Guidelines Forest Service (2000 Department of the Marine and Natural Resources) Forest Harvesting & the Environment Guidelines Forest Service (2000 Department of the Marine and Natural Resources)</p> <p>Given the requirement for the AA Screening and Appropriate Assessment (where required) as part of any and all licensed activities, it is not anticipated that any of the measures within Intervention 3 shall pose the potential for likely significant effects to European sites and/or their QIs</p>	<p>oad of that type or scale is objectively a low environmental risk, subject to any site-specific considerations, such that it merits a permit procedure involving less control than a full licence. In each case it will be necessary for a prior AA and EIA screening to be carried out before the works proceed, with the right of DAFM to intervene to require AA or EIA to be carried out</p> <p>DAFM to incorporate post-construction environmental monitoring to all forest road creation</p>
<p>Measure 2: Additional Element to Forest Road Scheme</p>	<p>Within the specific requirements for this Intervention and all measures within:</p> <p>All applications in relation to licensed activities that are part of this and all interventions will undergo a detailed project evaluation by the Department (via desk, field inspection (if required) and use of the GIS-based iFORIS system), referral to statutory consultees as required, AA Screening and Appropriate Assessment (where required) under the Habitats Directive, to ensure compatibility with the environment and to consider areas of habitat and species sensitivity within the project plan</p> <p>In assessing an application for a forestry licence, the Department is required to consider potential impacts across a range of issues and sensitivities. The following lists the primary components of the legal, regulatory and funding framework that apply:</p> <p>The Forestry Act 2014 (the Act) and the supplemental Forestry Regulation 2017 (SI No 191 of 2017)</p>	<p>DAFM to apply pollution prevention guidelines as a mandatory requirement for construction of any forest road type</p> <p>DAFM to incorporate post-construction environmental monitoring of all forest road creation</p>

Intervention, Measure, Requirement	Pre-existing Mitigation within the draft IFSIP	Further Mitigation
	<p>European Communities (Forest Consent & Assessment) Regulations 2010 (S I 558 of 2010), as amended</p> <p>European Union rules governing the Implementation Plan</p> <p>Legally protected species and habitats and associated designations (e.g., SAC, SPA, Natural Heritage Areas) and procedures (e.g., Appropriate Assessment)</p> <p>Water Framework Directive</p> <p>Legislation regarding archaeology and built heritage, including the National Monuments Acts</p> <p>DAFM requirements, procedures and protocols the Forestry Standards Manual; the relevant Forest Service Requirements and Guidelines including but not limited to Forestry & Archaeology Guidelines Forest Service (2000 Department of the Marine and Natural Resources Forest Harvesting & the Environment Guidelines Forest Service (2000 Department of the Marine and Natural Resources</p> <p>Given the requirement for the AA Screening and Appropriate Assessment (where required) as part of any and all licensed activities, it is not anticipated that any of the measures within Intervention 3 shall pose the potential for likely significant effects to European sites and/or their QIs</p>	
<p>Measure 3: Additional Element to Forest Road Scheme</p>	<p>Within the specific requirements for this Intervention and all measures within:</p> <p>All applications in relation to licensed activities that are part of this and all interventions will undergo a detailed project evaluation by the Department (via desk, field inspection (if required) and use of the GIS-based iFORIS system), referral to statutory consultees as required, AA Screening and Appropriate Assessment (where required) under the Habitats Directive, to ensure compatibility with the environment and to consider areas of habitat and species sensitivity within the project plan</p> <p>In assessing an application for a forestry licence, the Department is required to consider potential impacts across a range of issues and sensitivities. The following lists the primary components of the legal, regulatory and funding framework that apply:</p> <p>The Forestry Act 2014 (the Act) and the supplemental Forestry Regulation 2017 (SI No 191 of 2017)</p> <p>European Communities (Forest Consent & Assessment) Regulations 2010 (S I 558 of 2010), as amended</p> <p>European Union rules governing the Implementation Plan</p>	<p>DAFM to apply pollution prevention guidelines as a mandatory requirement for construction of any forest road type</p> <p>DAFM to incorporate post-construction environmental monitoring to all forest road creation</p> <p>DAFM to incorporate environmental monitoring of all water features created as part of this measure</p>

Intervention, Measure, Requirement	Pre-existing Mitigation within the draft IFSIP	Further Mitigation
	<p>Legally protected species and habitats and associated designations (e.g., SAC, SPA, Natural Heritage Areas) and procedures (e.g., Appropriate Assessment)</p> <p>Water Framework Directive</p> <p>Legislation regarding archaeology and built heritage, including the National Monuments Acts</p> <p>DAFM requirements, procedures and protocols the Forestry Standards Manual; the relevant Forest Service Requirements and Guidelines including but not limited to Forestry & Archaeology Guidelines Forest Service (2000 Department of the Marine and Natural Resources Forest Harvesting & the Environment Guidelines Forest Service (2000 Department of the Marine and Natural Resources</p> <p>Given the requirement for the AA Screening and Appropriate Assessment (where required) as part of any and all licensed activities, it is not anticipated that any of the measures within Intervention 3 shall pose the potential for likely significant effects to European sites and/or their QIs</p>	
<p>Measure 6: Innovative forest technology scheme – Element 2: temporary forest access measure</p>	<p>Within the specific requirements for this Intervention and all measures within:</p> <p>All applications in relation to licensed activities that are part of this and all interventions will undergo a detailed project evaluation by the Department (via desk, field inspection (if required) and use of the GIS-based iFORIS system), referral to statutory consultees as required, AA Screening and Appropriate Assessment (where required) under the Habitats Directive, to ensure compatibility with the environment and to consider areas of habitat and species sensitivity within the project plan</p> <p>In assessing an application for a forestry licence, the Department is required to consider potential impacts across a range of issues and sensitivities. The following lists the primary components of the legal, regulatory and funding framework that apply:</p> <p>The Forestry Act 2014 (the Act) and the supplemental Forestry Regulation 2017 (SI No 191 of 2017)</p> <p>European Communities (Forest Consent & Assessment) Regulations 2010 (S.I. 558 of 2010), as amended</p> <p>European Union rules governing the Implementation Plan</p> <p>Legally protected species and habitats and associated designations (e.g., SAC, SPA, Natural Heritage Areas) and procedures (e.g., Appropriate Assessment)</p> <p>Water Framework Directive</p>	<p>DAFM to apply pollution prevention guidelines as a mandatory requirement for construction of any forest road type</p> <p>DAFM to incorporate post-construction environmental monitoring to all forest road creation</p> <p>DAFM to incorporate environmental monitoring of all water features created as part of this measure</p>

Intervention, Measure, Requirement	Pre-existing Mitigation within the draft IFSIP	Further Mitigation
	<p>Legislation regarding archaeology and built heritage, including the National Monuments Acts</p> <p>DAFM requirements, procedures and protocols the Forestry Standards Manual; the relevant Forest Service Requirements and Guidelines including but not limited to Forestry & Archaeology Guidelines Forest Service (2000 Department of the Marine and Natural Resources Forest Harvesting & the Environment Guidelines Forest Service (2000 Department of the Marine and Natural Resources</p> <p>Given the requirement for the AA Screening and Appropriate Assessment (where required) as part of any and all licensed activities, it is not anticipated that any of the measures within Intervention 3 shall pose the potential for likely significant effects to European sites and/or their QIs</p>	
<p>Measure 8: Investment aid for the development of the forest tree nursery sector</p>	<p>Within the specific requirements for this Intervention and all measures within:</p> <p>All applications in relation to licensed activities that are part of this and all interventions will undergo a detailed project evaluation by the Department (via desk, field inspection (if required) and use of the GIS-based iFORIS system), referral to statutory consultees as required, AA Screening and Appropriate Assessment (where required) under the Habitats Directive, to ensure compatibility with the environment and to consider areas of habitat and species sensitivity within the project plan</p> <p>In assessing an application for a forestry licence, the Department is required to consider potential impacts across a range of issues and sensitivities. The following lists the primary components of the legal, regulatory and funding framework that apply:</p> <p>The Forestry Act 2014 (the Act) and the supplemental Forestry Regulation 2017 (SI No 191 of 2017)</p> <p>European Communities (Forest Consent & Assessment) Regulations 2010 (S I 558 of 2010), as amended</p> <p>European Union rules governing the Implementation Plan</p> <p>Legally protected species and habitats and associated designations (e.g., SAC, SPA, Natural Heritage Areas) and procedures (e.g., Appropriate Assessment)</p> <p>Water Framework Directive</p> <p>Legislation regarding archaeology and built heritage, including the National Monuments Acts</p> <p>DAFM requirements, procedures and protocols the Forestry Standards Manual; the relevant Forest Service Requirements and Guidelines including but not limited to Forestry & Archaeology Guidelines Forest Service (2000 Department of the Marine and</p>	<p>Any actions arising from this Measure to be reviewed for potential likely significant effects on European sites and whether they may fall under the definition of a project for plan which might require an AA Screening</p>

Intervention, Measure, Requirement	Pre-existing Mitigation within the draft IFSIP	Further Mitigation
	<p>Natural Resources Forest Harvesting & the Environment Guidelines Forest Service (2000 Department of the Marine and Natural Resources)</p> <p>Given the requirement for the AA Screening and Appropriate Assessment (where required) as part of any and all licensed activities, it is not anticipated that any of the measures within Intervention 3 shall pose the potential for likely significant effects to European sites and/or their QIs</p>	
Main Requirements	<p>Within the specific requirements for this Intervention and all measures within:</p> <p>All applications in relation to licensed activities that are part of this and all interventions will undergo a detailed project evaluation by the Department (via desk, field inspection (if required) and use of the GIS-based iFORIS system), referral to statutory consultees as required, AA Screening and Appropriate Assessment (where required) under the Habitats Directive, to ensure compatibility with the environment and to consider areas of habitat and species sensitivity within the project plan</p> <p>In assessing an application for a forestry licence, the Department is required to consider potential impacts across a range of issues and sensitivities. The following lists the primary components of the legal, regulatory and funding framework that apply:</p> <p>The Forestry Act 2014 (the Act) and the supplemental Forestry Regulation 2017 (SI No 191 of 2017)</p> <p>European Communities (Forest Consent & Assessment) Regulations 2010 (S I 558 of 2010), as amended</p> <p>European Union rules governing the Implementation Plan</p> <p>Legally protected species and habitats and associated designations (e.g., SAC, SPA, Natural Heritage Areas) and procedures (e.g., Appropriate Assessment)</p> <p>Water Framework Directive</p> <p>Legislation regarding archaeology and built heritage, including the National Monuments Acts</p> <p>DAFM requirements, procedures and protocols the Forestry Standards Manual; the relevant Forest Service Requirements and Guidelines including but not limited to Forestry & Archaeology Guidelines Forest Service (2000 Department of the Marine and Natural Resources Forest Harvesting & the Environment Guidelines Forest Service 2000 Department of the Marine and Natural Resources)</p> <p>Given the requirement for the AA Screening and Appropriate Assessment (where required) as part of any and all licensed activities, it is not anticipated that any of the</p>	Any future nurseries are subject to a Screening for AA

Intervention, Measure, Requirement	Pre-existing Mitigation within the draft IFSIP	Further Mitigation
	measures within Intervention 3 shall pose the potential for likely significant effects to European sites and/or their QIs	
Intervention 4 – Sustainable Forest Management		
Overall Objective	<p>Mitigation stated within the overall objective for Intervention 4:</p> <p>“All applications in relation to schemes that are part of this intervention will undergo a detailed project evaluation by the Department (via desk and field inspections, where required, and use of the GIS-based iFORIS system) “</p> <p>It is recommended that the following italicised text “referral to statutory consultees, AA Screening and Appropriate Assessment (where required) under the Habitats Directive and screening for EIA to ensure compatibility with the environment It is a mandatory requirement that all applications adhere to the environmental guidance set out within the guideline documents in Section 7.1 within the licensing application process”</p> <p>With the implementation of the above, it is not anticipated that this objective shall pose any potential for likely significant effects to European sites</p>	<p>Any future measures and/or actions arising from this overall objective should be reviewed for potential likely significant effects on European sites and whether they may fall under the definition of a project for plan which might require an AA Screening</p>
Measure 1: Forest Management Scheme: Element 1: Thinning, tending and agroforestry	<p>Mitigation stated within the overall objective for Intervention 4:</p> <p>“All applications in relation to schemes that are part of this intervention will undergo a detailed project evaluation by the Department (via desk and field inspections, where required, and use of the GIS-based iFORIS system) “</p> <p>It is recommended that the following italicised text “referral to statutory consultees, AA Screening and Appropriate Assessment (where required) under the Habitats Directive and screening for EIA to ensure compatibility with the environment It is a mandatory requirement that all applications adhere to the environmental guidance set out within the guideline documents in Section 7.1 within the licensing application process”</p> <p>With the implementation of the above, it is not anticipated that this objective shall pose any potential for likely significant effects to European sites</p>	<p>All thinning related activities fall under the licensing requirement for forestry related activities</p> <p>DAFM to integrate the recommendation of the Independent Regulatory Review of whether there is any category of ‘thinning’ which might be considered lower risk, from an environmental and social perspective. Assuming there is, it would need to be verified through environmental assessment (using criteria set out in the SEA/ EIA/Habitats and Water Framework Directives) that the ‘thinning’ activity is objectively a low environmental risk, subject to any site-specific considerations, such that it merits a permit or registration procedure involving less control than a full licence. In each case it will be necessary for a prior AA screening to be carried out before the works proceed, with the right of DAFM to intervene to require AA to be carried out, and a licence application to be made for the proposed ‘thinning’ activity. For public and larger forests, it would be most efficient to define and assess the proposed thinning activities in a forest management plan or equivalent, subject to prior AA. This recommendation would require legislative amendments and significant preparatory work and assessment to set the criteria for the appropriate level of regulatory control for the ‘thinning’ activities concerned</p>

Intervention, Measure, Requirement	Pre-existing Mitigation within the draft IFSIP	Further Mitigation
Requirement	<p>Mitigation stated within the overall objective for Intervention 4:</p> <p>“All applications in relation to schemes that are part of this intervention will undergo a detailed project evaluation by the Department (via desk and field inspections, where required, and use of the GIS-based iFORIS system) “</p> <p>It is recommended that the following italicised text “referral to statutory consultees, AA Screening and Appropriate Assessment (where required) under the Habitats Directive and screening for EIA to ensure compatibility with the environment. It is a mandatory requirement that all applications adhere to the environmental guidance set out within the guideline documents in Section 7.1 within the licensing application process”</p> <p>With the implementation of the above, it is not anticipated that this objective shall pose any potential for likely significant effects to European sites</p>	<p>All thinning related activities fall under the licensing requirement for forestry related activities</p> <p>DAFM to integrate the recommendation of the Independent Regulatory Review of whether there is any category of ‘thinning’ which might be considered lower risk, from an environmental and social perspective. Assuming there is, it would need to be verified through environmental assessment (using criteria set out in the SEA/ EIA/Habitats and Water Framework Directives) that the ‘thinning’ activity is objectively a low environmental risk, subject to any site-specific considerations, such that it merits a permit or registration procedure involving less control than a full licence. In each case it will be necessary for a prior AA screening to be carried out before the works proceed, with the right of DAFM to intervene to require AA to be carried out, and a licence application to be made for the proposed ‘thinning’ activity. For public and larger forests, it would be most efficient to define and assess the proposed thinning activities in a forest management plan or equivalent, subject to prior AA. This recommendation would require legislative amendments and significant preparatory work and assessment to set the criteria for the appropriate level of regulatory control for the ‘thinning’ activities concerned</p>
Measure 2: Forest Management Scheme: Element 2 continuous cover forestry	<p>Mitigation stated within the overall objective for Intervention 4:</p> <p>“All applications in relation to schemes that are part of this intervention will undergo a detailed project evaluation by the Department (via desk and field inspections, where required, and use of the GIS-based iFORIS system) “</p> <p>It is recommended that the following italicised text “referral to statutory consultees, AA Screening and Appropriate Assessment (where required) under the Habitats Directive and screening for EIA to ensure compatibility with the environment. It is a mandatory requirement that all applications adhere to the environmental guidance set out within the guideline documents in Section 7.1 within the licensing application process”</p> <p>With the implementation of the above, it is not anticipated that this objective shall pose any potential for likely significant effects to European sites</p>	<p>All thinning related activities to fall under the licensing requirement for forestry related activities</p> <p>All Forest Owners receive support and training on biodiversity and AA obligations</p>
Requirements	<p>Mitigation stated within the overall objective for Intervention 4:</p> <p>“All applications in relation to schemes that are part of this intervention will undergo a detailed project evaluation by the Department (via desk and field inspections, where required, and use of the GIS-based iFORIS system) “</p>	

Intervention, Measure, Requirement	Pre-existing Mitigation within the draft IFSIP	Further Mitigation
	<p>It is recommended that the following italicised text “referral to statutory consultees, AA Screening and Appropriate Assessment (where required) under the Habitats Directive and screening for EIA to ensure compatibility with the environment. It is a mandatory requirement that all applications adhere to the environmental guidance set out within the guideline documents in Section 7.1 within the licensing application process”</p> <p>With the implementation of the above, it is not anticipated that this objective shall pose any potential for likely significant effects to European sites</p>	
Measure 3: Forest Management Scheme: (Element 3 coppice and coppice with standards)	<p>Mitigation stated within the overall objective for Intervention 4:</p> <p>“All applications in relation to schemes that are part of this intervention will undergo a detailed project evaluation by the Department (via desk and field inspections, where required, and use of the GIS-based iFORIS system) “</p> <p>It is recommended that the following italicised text “referral to statutory consultees, AA Screening and Appropriate Assessment (where required) under the Habitats Directive and screening for EIA to ensure compatibility with the environment. It is a mandatory requirement that all applications adhere to the environmental guidance set out within the guideline documents in Section 7.1 within the licensing application process”</p> <p>With the implementation of the above, it is not anticipated that this objective shall pose any potential for likely significant effects to European sites</p>	<p>All thinning related activities fall under the licensing requirement for forestry related activities</p> <p>All Forest Owners to receive support and training on biodiversity and AA obligations</p>
Requirements	<p>Mitigation stated within the overall objective for Intervention 4:</p> <p>“All applications in relation to schemes that are part of this intervention will undergo a detailed project evaluation by the Department (via desk and field inspections, where required, and use of the GIS-based iFORIS system) “</p> <p>It is recommended that the following italicised text “referral to statutory consultees, AA Screening and Appropriate Assessment (where required) under the Habitats Directive and screening for EIA to ensure compatibility with the environment. It is a mandatory requirement that all applications adhere to the environmental guidance set out within the guideline documents in Section 7.1 within the licensing application process”</p> <p>With the implementation of the above, it is not anticipated that this objective shall pose any potential for likely significant effects to European sites</p>	<p>All thinning related activities fall under the licensing requirement for forestry related activities</p> <p>All Forest Owners to receive support and training on biodiversity and AA obligations</p>
Measure 6: Forest management plans (iPLAN scheme)	<p>Mitigation stated within the overall objective for Intervention 4:</p> <p>“All applications in relation to schemes that are part of this intervention will undergo a detailed project evaluation by the Department (via desk and field inspections, where required, and use of the GIS-based iFORIS system) “</p>	<p>Support and training on biodiversity and Appropriate Assessment obligations under the Habitats Directive to be delivered to all users of the iPLAN scheme</p> <p>DAFM to integrate the recommendation of the Independent Regulatory Review builds on the methodology employed in the Indicative Forestry Statement (2008) by consulting with the public</p>

Intervention, Measure, Requirement	Pre-existing Mitigation within the draft IFSIP	Further Mitigation
	<p>It is recommended that the following italicised text “referral to statutory consultees, AA Screening and Appropriate Assessment (where required) under the Habitats Directive and screening for EIA to ensure compatibility with the environment. It is a mandatory requirement that all applications adhere to the environmental guidance set out within the guideline documents in Section 7.1 within the licensing application process”</p> <p>With the implementation of the above, it is not anticipated that this objective shall pose any potential for likely significant effects to European sites</p>	<p>and key stakeholders on the relevant data sets which may be available*, reliable, and relevant to be incorporated into the spatial mapping process, and the criteria which should be used to determine the categories (and sub-categories, if required) of areas which may be identified as suitable or unsuitable, perhaps with more granular breakdown of the type of forests which may be suitable in certain areas. As the goal is to move towards a more plan-led approach to forestry licensing, the objective should be to produce an up-to-date spatial map which will guide and support current and future forest policies and programmes, attract afforestation to the right areas, while respecting obligations under EU environmental directives. For this reason, prior to the adoption of any up-to-date version of the Indicative Forestry Statement and spatial map, it would be necessary to ensure that it is subject to assessment under the SEA and Habitats Directives. This would then potentially allow DAFM to filter licence applications by reference to that document and the spatial categorisation, by reference to (i) those which are more likely to be favourably considered from an environmental perspective, (ii) those which will require much greater levels of technical scrutiny, and (iii) those which are likely to be given less favourable consideration unless significant mitigations are proposed and carefully assessed. This would allow DAFM to deploy specialist resources where they are most needed, and to support the EU Forest Strategy 2030 for the right tree in the right place and for the right purpose</p>
Measure 7: Native woodland conservation	<p>Mitigation stated within the overall objective for Intervention 4:</p> <p>“All applications in relation to schemes that are part of this intervention will undergo a detailed project evaluation by the Department (via desk and field inspections, where required, and use of the GIS-based iFORIS system) “</p> <p>It is recommended that the following italicised text “referral to statutory consultees, AA Screening and Appropriate Assessment (where required) under the Habitats Directive and screening for EIA to ensure compatibility with the environment. It is a mandatory requirement that all applications adhere to the environmental guidance set out within the guideline documents in Section 7.1 within the licensing application process”</p> <p>With the implementation of the above, it is not anticipated that this objective shall pose any potential for likely significant effects to European sites</p>	<p>DAFM to incorporate environmental monitoring on all sites where native woodland conservation occurs</p>
Main requirements	<p>Mitigation stated within the overall objective for Intervention 4:</p>	<p>DAFM to incorporate environmental monitoring on all sites where native woodland conservation occurs</p>

Intervention, Measure, Requirement	Pre-existing Mitigation within the draft IFSIP	Further Mitigation
	<p>“All applications in relation to schemes that are part of this intervention will undergo a detailed project evaluation by the Department (via desk and field inspections, where required, and use of the GIS-based iFORIS system) “</p> <p>It is recommended that the following italicised text “referral to statutory consultees, AA Screening and Appropriate Assessment (where required) under the Habitats Directive and screening for EIA to ensure compatibility with the environment It is a mandatory requirement that all applications adhere to the environmental guidance set out within the guideline documents in Section 7 1 within the licensing application process”</p> <p>With the implementation of the above, it is not anticipated that this objective shall pose any potential for likely significant effects to European sites</p>	
<p>Measure 8: Environmental enhancement scheme</p> <p>Main requirements</p>	<p>Mitigation stated within the overall objective for Intervention 4:</p> <p>“All applications in relation to schemes that are part of this intervention will undergo a detailed project evaluation by the Department (via desk and field inspections, where required, and use of the GIS-based iFORIS system) “</p> <p>It is recommended that the following italicised text “referral to statutory consultees, AA Screening and Appropriate Assessment (where required) under the Habitats Directive and screening for EIA to ensure compatibility with the environment It is a mandatory requirement that all applications adhere to the environmental guidance set out within the guideline documents in Section 7 1 within the licensing application process”</p> <p>With the implementation of the above, it is not anticipated that this objective shall pose any potential for likely significant effects to European sites</p>	<p>Support and training on biodiversity and AA obligations under the Habitats Directive to be delivered to all users</p> <p>DAFM to incorporate environmental monitoring as an aspect of this measure</p>
Intervention 5: Developing skills and empowering people for SFM		
<p>Measure 1: Forestry knowledge transfer groups (KTGs)</p>	<p>Mitigation recommendations for this Measure are found in the adjoining column</p>	<p>All persons involved in the forestry licence application process, including applicants, landowners, licensed foresters etc receive education and training on the biodiversity and AA obligations</p> <p>DAFM to incorporate the recommendation of the Independent Regulatory Review that DAFM Inspectors and other personnel directly involved in decision making are provided with regular access to relevant training opportunities, both internal and external, to keep abreast of relevant developments in EU and domestic environmental law, and the appropriate methodological approach to carrying out screening for AA and screening for EIA (where applicable) and assessing the implications for water quality and species All personnel involved in the preparation of licence decisions would benefit from periodic refresher training on the duty to give reasons under section 7(3) of the Forestry Act and</p>

Intervention, Measure, Requirement	Pre-existing Mitigation within the draft IFSIP	Further Mitigation
		Regulation 21(1)(b) of the Forestry Regulations, which will include the reasons for the AA screening / AA determination
Measure 2: Training call for proposals	Mitigation recommendations for this Measure are found in the adjoining column	<p>All persons involved in the forestry licence application process, including applicants, landowners, licensed foresters etc to receive education and training on the biodiversity and AA obligations</p> <p>DAFM to integrate the recommendation of the Independent Regulatory Review that DAFM Inspectors and other personnel directly involved in decision making are provided with regular access to relevant training opportunities, both internal and external, to keep abreast of relevant developments in EU and domestic environmental law, and the appropriate methodological approach to carrying out screening for AA and screening for EIA (where applicable) and assessing the implications for water quality and species. All personnel involved in the preparation of licence decisions would benefit from periodic refresher training on the duty to give reasons under section 7(3) of the Forestry Act and Regulation 21(1)(b) of the Forestry Regulations, which will include the reasons for the AA screening / AA determination</p>
Intervention 6 – Open Forests		
Specific Requirements	<p>Text outlined within the Draft IFSIP pertaining to Intervention 6 states:</p> <p>“Applications for new forests will be submitted through the Afforestation Scheme as mentioned in intervention 1”</p> <p>All afforestation applications as part of Intervention 1 are required to adhere to and provide the following:</p> <p>The mandatory requirements relevant to the AA process found within the Draft IFSIP are:</p> <p>All initial afforestation applications are screened for appropriate assessment (AA) to determine whether the proposed project, individually or in combination with other plans and projects, is likely to have a significant effect on any European site (i.e., Natura 2000 sites), in view of the site’s conservation objectives</p> <p>Afforestation applications within European sites (SAC or SPA) will only be approved if they are compatible with the conservation objectives of the European site and will not adversely affect the integrity of the site concerned</p>	<p>Follow-up environmental monitoring of the new forests created as part of Intervention 2</p> <p>DAFM to integrate the recommendation of the Independent Regulatory Review to develop mandatory of ‘no-go’ zones and ‘go-to’ or preferred areas for afforestation</p>

Intervention, Measure, Requirement	Pre-existing Mitigation within the draft IFSIP	Further Mitigation
	<p>The Minister has an obligation, pursuant to Regulation 20(3) of SI 191 of 2017 to refuse an application if, in his or her opinion, the proposed development is likely to have significant adverse impact on nature conservation</p> <p>Public authorities, in the exercise of their functions, insofar as the requirements of the Birds Directive and the Habitats Directive are relevant to those functions, shall—</p> <p>(a) take the appropriate steps to avoid, in candidate special protection areas, pollution and deterioration of habitats and any disturbances affecting the birds insofar as these would be significant in relation to the objectives of Article 4 of the Birds Directive,</p> <p>(b) outside those areas, strive to avoid pollution or deterioration of habitats, and</p> <p>(c) take appropriate enforcement action</p> <p>The schemes as applied, must be in compliance with the Forestry Act, 2014, S I 191 of 2017 (as amended) and existing forestry requirements, such as adherence to the standards set out in the Forestry Standards Manual, Environmental Requirements for Afforestation and the Land Types for Afforestation. These include specific requirements with regard establishment, land types, environmental protection, forest design, a prescribed list of species/provenance and origin for the planting material used</p> <p>In lieu of the above requirements for all afforestation licence applications and considering that an afforestation licence is required for the Measures found within Intervention, it is not anticipated that Intervention 1 shall pose a likely significant effect on Natura 2000 sites and/or their QIs</p> <p>With the implementation of the above, it is not anticipated that this objective shall pose any potential for likely significant effects to European sites</p>	
Measure 2: The active forest	<p>Text outlined within the Draft IFSIP pertaining to Intervention 6 states:</p> <p>“Applications for new forests will be submitted through the Afforestation Scheme as mentioned in intervention 1”</p> <p>All afforestation applications as part of Intervention 1 are required to adhere to and provide the following:</p> <p>The mandatory requirements relevant to the AA process found within the Draft IFSIP are:</p> <p>All initial afforestation applications are screened for appropriate assessment (AA) to determine whether the proposed project, individually or in combination with other plans and projects, is likely to have a significant effect on any European site (i.e., Natura 2000 sites), in view of the site’s conservation objectives</p>	<p>Follow-up environmental monitoring to be carried out on forests created as part of the Neighbourwood Scheme</p> <p>DAFM to incorporate the recommendation of the Independent Regulatory Review to develop mandatory of ‘no-go’ zones and ‘go-to’ or preferred areas for afforestation</p>

Intervention, Measure, Requirement	Pre-existing Mitigation within the draft IFSIP	Further Mitigation
	<p>Afforestation applications within European sites (SAC or SPA) will only be approved if they are compatible with the conservation objectives of the European site and will not adversely affect the integrity of the site concerned</p> <p>The Minister has an obligation, pursuant to Regulation 20(3) of SI 191 of 2017 to refuse an application if, in his or her opinion, the proposed development is likely to have significant adverse impact on nature conservation</p> <p>Public authorities, in the exercise of their functions, insofar as the requirements of the Birds Directive and the Habitats Directive are relevant to those functions, shall—</p> <p>(a) take the appropriate steps to avoid, in candidate special protection areas, pollution and deterioration of habitats and any disturbances affecting the birds insofar as these would be significant in relation to the objectives of Article 4 of the Birds Directive,</p> <p>(b) outside those areas, strive to avoid pollution or deterioration of habitats, and</p> <p>(c) take appropriate enforcement action</p> <p>The schemes as applied, must be in compliance with the Forestry Act, 2014, S I 191 of 2017 (as amended) and existing forestry requirements, such as adherence to the standards set out in the Forestry Standards Manual, Environmental Requirements for Afforestation and the Land Types for Afforestation. These include specific requirements with regard to establishment, land types, environmental protection, forest design, a prescribed list of species/provenance and origin for the planting material used</p> <p>In lieu of the above requirements for all afforestation licence applications and considering that an afforestation licence is required for the Measures found within Intervention, it is not anticipated that Intervention 1 shall pose a likely significant effect on Natura 2000 sites and/or their QIs</p> <p>With the implementation of the above, it is not anticipated that this objective shall pose any potential for likely significant effects to European sites</p>	
Requirements	The potential for likely significant effects is mitigated through the implementation of mitigation identified within Measure 2 (above)	All persons involved in the forestry licence application process, including foresters, advisors, contractors etc to receive education and training on the biodiversity and AA obligations under the Habitats Directive
Measure 3: Heartwoods Environmental Target and Requirements	Text outlined within the Draft IFSIP pertaining to Intervention 6 states: "Applications for new forests will be submitted through the Afforestation Scheme as mentioned in intervention 1"	DAFM to incorporate the recommendation of the Independent Regulatory Review to develop mandatory 'no-go' zones and 'go-to' areas for afforestation

Intervention, Measure, Requirement	Pre-existing Mitigation within the draft IFSIP	Further Mitigation
	<p>All afforestation applications as part of Intervention 1 are required to adhere to and provide the following:</p> <p>The mandatory requirements relevant to the AA process found within the Draft IFSIP are:</p> <p>All initial afforestation applications are screened for appropriate assessment (AA) to determine whether the proposed project, individually or in combination with other plans and projects, is likely to have a significant effect on any European site (i.e., Natura 2000 sites), in view of the site's conservation objectives</p> <p>Afforestation applications within European sites (SAC or SPA) will only be approved if they are compatible with the conservation objectives of the European site and will not adversely affect the integrity of the site concerned</p> <p>The Minister has an obligation, pursuant to Regulation 20(3) of SI 191 of 2017 to refuse an application if, in his or her opinion, the proposed development is likely to have significant adverse impact on nature conservation</p> <p>Public authorities, in the exercise of their functions, insofar as the requirements of the Birds Directive and the Habitats Directive are relevant to those functions, shall—</p> <p>(a) take the appropriate steps to avoid, in candidate special protection areas, pollution and deterioration of habitats and any disturbances affecting the birds insofar as these would be significant in relation to the objectives of Article 4 of the Birds Directive,</p> <p>(b) outside those areas, strive to avoid pollution or deterioration of habitats, and</p> <p>(c) take appropriate enforcement action</p> <p>The schemes as applied, must be in compliance with the Forestry Act, 2014, S I 191 of 2017 (as amended) and existing forestry requirements, such as adherence to the standards set out in the Forestry Standards Manual, Environmental Requirements for Afforestation and the Land Types for Afforestation. These include specific requirements with regard to establishment, land types, environmental protection, forest design, a prescribed list of species/provenance and origin for the planting material used</p> <p>In lieu of the above requirements for all afforestation licence applications and considering that an afforestation licence is required for the Measures found within Intervention, it is not anticipated that Intervention 1 shall pose a likely significant effect on Natura 2000 sites and/or their QIs</p> <p>With the implementation of the above, it is not anticipated that this objective shall pose any potential for likely significant effects to European sites</p>	
Intervention 7- Climate Resilient Reforestation		

Intervention, Measure, Requirement	Pre-existing Mitigation within the draft IFSIP	Further Mitigation
Overall Objective	<p>Text within the overall objective of Intervention 7 states:</p> <p>"Mandatory replant conditions are determined as per Felling and Reforestation Policy (DAFM, 2017) and are consistent with Sustainable Forest Management Principles... And "In addition to mandatory requirements set under replanting conditions, all interventions will be subject to the DAFM-Forest Service Forestry Standards, including the accepted species, origin and provenance list"</p> <p>In addition, the following text pertaining to Intervention 7 states:</p> <p>"Whilst the schemes align with specific objectives of Article 6, the requirements for payments for grants and premiums requires landowners to include specific measures, which are assessed by Department Inspectors. These includes a suite of mandatory measures relating to biodiversity, environmental protection and the provision of ecosystem services. The schemes as applied, must be in compliance with the Forestry Act, 2014, S I 191 of 2017 (as amended) and existing forestry requirements, such as adherence to the standards set out in the Forestry Standards Manual, Environmental Requirements for Afforestation and the Land Types for Afforestation..... The replanting condition and other statutory obligations are determined as part of granting of the felling license Under the Forestry Act, 2014, S I 191 of 2017"</p> <p>With the requirement that schemes be in compliance with the Forestry Act 2014 S I 191 of 2017 in addition to the mandatory adherence to the suite of documents aforementioned above, it is not anticipated that this objective shall pose any potential for likely significant effects to European sites</p>	DAFM to incorporate follow up environmental monitoring for sites that fall under Intervention 7
Measure 1: Resilient reforestation (Element 1: Reforestation for continuous cover forestry)	<p>The following text pertaining to Intervention 7 states:</p> <p>"Whilst the schemes align with specific objectives of Article 6, the requirements for payments for grants and premiums requires landowners to include specific measures, which are assessed by Department Inspectors. These includes a suite of mandatory measures relating to biodiversity, environmental protection and the provision of ecosystem services. The schemes as applied, must be in compliance with the Forestry Act, 2014, S I 191 of 2017 (as amended) and existing forestry requirements, such as adherence to the standards set out in the Forestry Standards Manual, Environmental Requirements for Afforestation and the Land Types for Afforestation..... The replanting condition and other statutory obligations are determined as part of granting of the felling license Under the Forestry Act, 2014, S I 191 of 2017"</p> <p>With the requirement that schemes be in compliance with the Forestry Act 2014 S I 191 of 2017 in addition to the mandatory adherence to the suite of documents aforementioned above, it is not anticipated that this objective shall pose any potential for likely significant effects to European sites</p>	DAFM incorporate follow up environmental monitoring for sites that fall under Intervention 7

Intervention, Measure, Requirement	Pre-existing Mitigation within the draft IFSIP	Further Mitigation
Measure 2: Resilient reforestation (Element 2: Reforestation for native woodlands)	<p>Text within the main requirements of Measure 2 states ‘The Native Woodland Scheme Framework applies’</p> <p>Requirements for the Native Woodland Scheme Framework includes the application of the Forest Service AA procedure and further safeguards for the environment⁶</p> <p>In addition, further text states: “Whilst the schemes align with specific objectives of Article 6, the requirements for payments for grants and premiums requires landowners to include specific measures, which are assessed by Department Inspectors. These includes a suite of mandatory measures relating to biodiversity, environmental protection and the provision of ecosystem services. The schemes as applied, must be in compliance with the Forestry Act, 2014, S I 191 of 2017 (as amended) and existing forestry requirements, such as adherence to the standards set out in the Forestry Standards Manual, Environmental Requirements for Afforestation and the Land Types for Afforestation..... The replanting condition and other statutory obligations are determined as part of granting of the felling license Under the Forestry Act, 2014, S I 191 of 2017”</p> <p>With the requirement that schemes be in compliance with the Forestry Act 2014 S I 191 of 2017 in addition to the mandatory adherence to the suite of documents aforementioned above, it is not anticipated that this objective shall pose any potential for likely significant effects to European sites</p>	DAFM to incorporate follow up environmental monitoring for sites that fall under Intervention 7
Measure 3: Resilient reforestation: Element 3 (Reforestation for Biodiversity and water protection)	<p>The following text pertaining to Intervention 7 states:</p> <p>“Whilst the schemes align with specific objectives of Article 6, the requirements for payments for grants and premiums requires landowners to include specific measures, which are assessed by Department Inspectors. These includes a suite of mandatory measures relating to biodiversity, environmental protection and the provision of ecosystem services. The schemes as applied, must be in compliance with the Forestry Act, 2014, S I 191 of 2017 (as amended) and existing forestry requirements, such as adherence to the standards set out in the Forestry Standards Manual, Environmental Requirements for Afforestation and the Land Types for Afforestation..... The replanting condition and other statutory obligations are determined as part of granting of the felling license Under the Forestry Act, 2014, S I 191 of 2017”</p> <p>With the requirement that schemes be in compliance with the Forestry Act 2014 S I 191 of 2017 in addition to the mandatory adherence to the suite of documents</p>	DAFM to incorporate follow up environmental monitoring for sites that fall under Intervention 7

⁶ DAFM (2015) Native Woodland Conservation Scheme September 2015 Forest Service, Department of Agriculture, Food & The Marine, Accessed at <https://www.gov.ie/en/service/803ef3-native-woodland-conservation-scheme/> on 10/10/2022

Intervention, Measure, Requirement	Pre-existing Mitigation within the draft IFSIP	Further Mitigation
	aforementioned above, it is not anticipated that this objective shall pose any potential for likely significant effects to European sites	
Intervention 8 – Reconstitution		
Overall Objective	<p>Text within the Draft IFSIP pertaining to Intervention 8 states:</p> <p>Explanation as to how the commitment goes beyond mandatory requirements</p> <p>Whilst the schemes align with specific objectives of Article 6, the requirements for payments for grants and premiums require landowners to include specific measures, which are assessed by Department Inspectors. These include a suite of mandatory measures relating to biodiversity, environmental protection and the provision of ecosystem services. The schemes as applied, must be in compliance with the Forestry Act, 2014, S I 191 of 2017 (as amended) and existing forestry requirements, such as adherence to the standards set out in the Forestry Standards Manual, Environmental Requirements for Afforestation and the Land Types for Afforestation. These include specific requirements with regard to establishment, land types, environmental protection, forest design, a prescribed list of species/provenance and origin for the planting material used.</p> <p>With the requirement that schemes be in compliance with the Forestry Act 2014 S I 191 of 2017 in addition to the mandatory adherence to the suite of documents aforementioned above, it is not anticipated that this objective shall pose any potential for likely significant effects to European sites</p>	DAFM to incorporate follow up environmental monitoring for sites that fall under Intervention 8
Measure 1: Reconstitution Scheme	<p>Text within the Draft IFSIP pertaining to Intervention 8 states:</p> <p>Explanation as to how the commitment goes beyond mandatory requirements</p> <p>Whilst the schemes align with specific objectives of Article 6, the requirements for payments for grants and premiums require landowners to include specific measures, which are assessed by Department Inspectors. These include a suite of mandatory measures relating to biodiversity, environmental protection and the provision of ecosystem services. The schemes as applied, must be in compliance with the Forestry Act, 2014, S I 191 of 2017 (as amended) and existing forestry requirements, such as adherence to the standards set out in the Forestry Standards Manual, Environmental Requirements for Afforestation and the Land Types for Afforestation. These include specific requirements with regard to establishment, land types, environmental protection, forest design, a prescribed list of species/provenance and origin for the planting material used.</p> <p>With the requirement that schemes be in compliance with the Forestry Act 2014 S I 191 of 2017 in addition to the mandatory adherence to the suite of documents aforementioned above, it is not anticipated that this objective shall pose any potential for</p>	DAFM to incorporate follow up environmental monitoring for sites that fall under Intervention 8

Intervention, Measure, Requirement	Pre-existing Mitigation within the draft IFSIP	Further Mitigation
	likely significant effects to European sites With the implementation of the above, it is not anticipated that this objective shall pose any potential for likely significant effects to European sites	
Requirements	<p>Text within the Draft IFSIP pertaining to Intervention 8 states:</p> <p>Explanation as to how the commitment goes beyond mandatory requirements</p> <p>Whilst the schemes align with specific objectives of Article 6, the requirements for payments for grants and premiums require landowners to include specific measures, which are assessed by Department Inspectors These include a suite of mandatory measures relating to biodiversity, environmental protection and the provision of ecosystem services The schemes as applied, must be in compliance with the Forestry Act, 2014, S I 191 of 2017 (as amended) and existing forestry requirements, such as adherence to the standards set out in the Forestry Standards Manual, Environmental Requirements for Afforestation and the Land Types for Afforestation These include specific requirements with regard to establishment, land types, environmental protection, forest design, a prescribed list of species/provenance and origin for the planting material used</p> <p>With the requirement that schemes be in compliance with the Forestry Act 2014 S I 191 of 2017 in addition to the mandatory adherence to the suite of documents aforementioned above, it is not anticipated that this objective shall pose any potential for likely significant effects to European sites</p>	DAFM to incorporate follow up environmental monitoring for sites that fall under Intervention 8

Table 4.3 Mitigation Measures set out in the NIR (as they relate to Goals and Actions)

Goal & Action	Mitigation
Action 6 - Engage with forest owners through Forestry Knowledge Transfer Groups to develop skills and expertise across the forestry sector	All Forest Owners receive education and training on the biodiversity and AA obligations All licensed Foresters receive education and training on AA obligations and the potential risks to the key receptors Such training should encompass guidance on the identification of receptors, the risk, pressures and threats they face and measures to avoid
Action 9 – Review, implement and build on the recommendations of the independent Regulatory Review of the existing statutory framework for the licencing of forestry activities in relation to environmental and public participation obligations	Any recommendations or actions arising from the independent Regulatory Review be subject to a Screening for AA where relevant
Action 10 – Support the work of the Land use Review Group to ensure that balanced land use options inform forest establishment decisions	Any “optimal land use options” recommended by the Land use Review Group relating to forest establishment be subject to AA Screening
Action 11 – Align tree planting measures in Agri-Environment Schemes with forest creation support measures	All tree planting measures in Agri-Environment Schemes facilitate education and training to all involved parties regarding biodiversity and AA obligations
Action 14 - Provide advice, training, and research on farm forestry and related matters	All involved in the provision of advice, training and research on farm forestry receive education and training on the biodiversity and AA obligations

Goal & Action	Mitigation
Action 15 - Promote forests and forestry on the public forest estate through the provision of recreation areas, the development of visitor destinations, and knowledge transfer initiatives on the multifunctional role of forests in our society	The provision of recreation areas and development of visitor destinations be subject to Screening for AA where applicable
Goal - Incentives for forest creation and management New incentives for the establishment and management of diverse, multifunctional forests that strengthen the economic viability of rural communities, protect our environment and are resilient in the face of climate change	Any future support scheme within the Draft IFSIP should be reviewed for potential likely significant effects on European sites and whether they may fall under the definition of a project or plan which might require AA Screening
Action 20 – Update the reference standard for forest practice in Ireland	The reference standard for forest practice reflects obligations that fall under the Habitats Directive, best available science and so as to avoid inappropriate or inadequate regard to Natura 2000 sites and that an AA Screening be prepared for any updated reference standard as necessary
Action 28 – Review and assess the training needs of those who are directly involved in submitting forestry licence applications	All persons involved in the forestry licence application process, including applicants, landowners, licensed foresters etc receive education and training on the biodiversity and AA obligations
Action 30 - Establish forest Knowledge Transfer Groups (KTGs) to increase the standard of forest management activity amongst participating forest owners	All persons involved in the forestry licence application process, including applicants, landowners, licensed foresters etc receive education and training on the biodiversity and AA obligations
Action 31 - Provide support for ongoing continuous professional development among forest professionals, including foresters, ecologists, forest operatives and advisors	All persons involved in the forestry licence application process, including foresters, advisors, contractors etc receive education and training on the biodiversity and AA obligations
Goal – Forest Expansion A major expansion of climate resilient and healthy forests following the principles of sustainable forest management and the right trees in the right places for the right reasons with the right management	All persons involved in the forestry licence application process, including applicants, landowners, licensed foresters etc receive education and training on the biodiversity and AA obligations
Action 38 – Provide advisory and knowledge transfer services to support landowners in the forest establishment decision	All persons involved in the forestry licence application process, including applicants, landowners, licensed foresters etc receive education and training on the biodiversity and AA obligations
Action 42 – Implement support schemes for the reconstitution of forests following significant damage by natural causes	All cases considered in the reconstitution scheme undergo a Screening for AA, and where applicable, a Stage 2 NIS
Action 43 – Implement redesign and habitat restoration measures for forests on peatlands based on the best available science	All cases relating to habitat redesign and restoration for forests on peatland be subject to a Screening for Appropriate Assessment, and where applicable, a Stage 2 NIS
Action 44 - DAFM will encourage alignment of its actions to support the actions in the Climate Action Plan on the Built Environment including standards, research and technologies	Ensure alignment with other national, regional and local level plans such as the Biodiversity Action Plan, the Prioritised Action Framework for Natura 2000, River Basin Management Plans etc , where applicable elsewhere in the Draft IFSIP
Goal – Supply An expansion at scale to continue to increase the supply of sustainable raw material from Ireland’s forest resource. A critical component will be efficient and effective licensing and regulatory procedures. Also, investment in research and development in the supply chain employing innovative technologies is to be prioritised	Any future support scheme as part of this overall Goal should be reviewed for potential likely significant effects on European sites and whether they may fall under the definition of a project or plan which might require AA Screening
Goal – Native Forest Expansion A major expansion of native forests and improved diversity of native tree species in new and existing forests	Any future support scheme as part of this overall Goal should be reviewed for potential likely significant effects on European sites and whether they may fall under the definition of a project or plan which might require AA Screening

Goal & Action	Mitigation
<p>Goal – Protecting and Restoring Natural Heritage and Ecosystem Services Forestry practices will safeguard and enhance the quality of Ireland’s air, water, soils, landscapes, habitats and population of protected species. This includes support and funding for the provision of non-timber ecosystem services</p>	<p>All actions as part of this Goal incorporate a Screening for AA and Ecological Impact Assessment for any forestry activities to review the potential for likely significant effects on European sites</p>
<p>Action 64 - Support the establishment and natural regeneration of native forest on post-industrial cutaway peatlands, where appropriate</p>	<p>All projects that fall under this category of ‘natural regeneration of native forest on post-cutaway peatlands, where appropriate’ be subject to a Screening for AA, and where applicable, a Stage 2 NIS to assess the potential for likely significant effects</p>
<p>Action 66 - Implement the restoration and conservation of forests in state-owned properties, particularly National Parks and Nature Reserves</p>	<p>All cases for the implementation and conservation of forests in state-owned properties, including National Parks and Nature Reserves be subject to a Screening for AA, and where applicable, a Stage 2 NIS</p>
<p>Action 71 - Review and expand the Neighbourwood Scheme to support the creation of new public amenity forests and the enhancement of existing forests for public access, education, recreation and health and wellbeing for rural and urban communities</p>	<p>All cases relating the expansion of the Neighbourwood forests be subject to a Screening for AA, and where applicable, a Stage 2 NIS</p>
<p>Action 79 - Establishment of a number of pilot areas to develop a plan led approach to afforestation in collaboration with stakeholders. These pilot areas will help inform a national approach to plan led afforestation</p>	<p>All cases relating the establishment of pilot areas to develop a plan led approach to afforestation be subject to a Screening for AA, and where applicable, a Stage 2 NIS</p>

Appendix B - Scoping Consultation Responses

Table 4.4 Scoping Consultation Responses

Consultee/ Stakeholder	SEA Scoping Response	SEA Actions
Environmental Protection Agency (EPA)	Cover letter highlighted some key environmental issues relating to forestry and also the SEA process, including: <ul style="list-style-type: none"> Emissions- The forestry sector is projected to become a net source of carbon emissions in the near future. Current low afforestation rates (~2,000 ha) are well below the planned 8,000 ha foreseen annually. This, combined with increased timber harvest, will lead to further reductions in the ability of our national forests to contribute to CO2 emissions removals going forward. Water Quality- forestry operations, particularly in legacy sites, continue to impact on water quality. Sediment losses from forestry operations in upland catchments is the most significant pressure impacting on our high-status waters. The presence of cypermethrin has been detected, at significant concentrations in Irish rivers and lakes. 	Key Environmental issues taken into account as part of baseline environment description and integrated into environmental assessment outcome
	We recommend including schematics in the Programme and SEA Environmental Report, showing the links and key inter-relationships with other key relevant national, regional, sectoral and environmental plans, e.g., River Basin Management Plans, Agri-Food Strategy to 2030, CAP Strategic Plan	Schematic of relationship with other plans included in ER
	In finalising the Plan and integrating the findings of the SEA into the Plan, the relevant recommendations, key issues and challenges described in the SOER2020 should be taken into account	Recommendations and key issues described in the SOER2020 have been considered and integrated into the Environmental Report
	All recommendations from the SEA, including mitigation measures, should be integrated into the Plan. The SEA Environmental Report should include a chapter outlining how the recommendations and mitigation measures from the SEA have been incorporated into the Plan. We recommend that the SEA Environmental Report includes relevant summary tables outlining the key findings of the SEA and linking the significant environmental effects identified to the proposed mitigation measures, monitoring measures and recommendations	Recommendations and Mitigation Measures of SEA have been integrated into the plan, in so far as possible. Chapter included in ER outlining how these have been incorporated
	It is recommended to include a section on Monitoring, Implementation and Reporting. Ideally these should align with the plan reviews and existing cyclical reporting. Reviewing and providing information on the previous plan is recommended. Progress-related implementation reports are recommended as appropriate and should be aligned with environmental monitoring required under SEA legislation. Monitoring should address positive, negative and cumulative effects when they occur and should provide ongoing review to allow early response to environmental issues. This report should state monitoring frequency, responsibilities and provisions for reporting. The same indicators should be used for plan and SEA related monitoring. An environmental subgroup is recommended for overseeing the approach to the monitoring and reporting elements. Other plans monitoring approaches should be considered (Offshore Renewable Energy Development Plan (ORED) and Food Wise 2025)	Section 9 of this ER contains information on monitoring and reporting DAFM to consider monitoring reporting and establishment of environmental sub-group

Consultee/ Stakeholder	SEA Scoping Response	SEA Actions
	In order to ensure as effective an SEA process as possible, and to ensure meaningful public/stakeholder consultation and engagement, it is important that the timing of the statutory consultations is appropriate to ensure sufficient time to incorporate the information gleaned into the Plan	In accordance with Article 13 of the SEA Regulations (S.I. 435 of 2004, as amended) DAFM will undertake consultation with the statutory environmental authorities, as well as the public, for a period of not less than 4 weeks. A notice shall be published in at least one newspaper with a sufficiently large circulation in the area covered by the plan and the publication of the SEA Statement of the Plan will include information on how submissions and observations and consultation feedback made to DAFM during the SEA process have been incorporated into the Plan. Duration of statutory consultation periods for the consideration of DAFM
	It is recommended to clarify whether the requirements of the SEA Directive are relevant to Ireland's Forest Strategy. To assist in this, the EPA Good Practice Guidance on SEA Screening should be consulted	In accordance with the SEA Screening report, it has been concluded that the SEA Directive does not apply to the Forest Strategy
	In chapter 1: Summarise the changes in the various environmental criteria from the last iteration of the Plan, to help determine how well environmental considerations have been implemented to date	Contained throughout Section 5, in so far as possible
	No revoked legislation or outdated plans or programmes are referenced (provided list of legislation, plans, programmes and research resources that may be relevant for consideration)	Noted. List of plans and programmes reviewed
	Targets and the objectives of the Plan should include the objective not to cause impact on the condition of our waters	Objective relating to water quality included in Section 6 of this ER
	In chapter 2: It is recommended to amend the following objective to "Supporting forest owners and or managers to actively manage their plantations". There is merit in amending this objective as follows "Supporting forest owners and or managers to sustainably and effectively manage their plantations"	Objective updated
	It is recommended that potential developers (many of whom are EPA licensees) are engaged in the plan-making process and SEA process in relation to the Forests for Economy strategic theme	These stakeholders will be invited to make submissions/observations on the IFSIP and SEA ER as part of the statutory consultation
	In chapter 4: Provide an additional map in the SEA Scoping Report associated with "Land Use Change", to identify areas for potential changes in land use over the lifetime of the Plan	A map has been included in Appendix B of this Environmental Report displaying Corine Landcover Dataset across the Plan area
	Include a commitment to ensure that this fourth NFI is taken into account in preparing and implementing the Plan	For consideration by DAFM
	Use population baseline preliminary census of population results for 2022 are available here	The use of 2022 Preliminary Census Data has been incorporated into Section 5.2 Population and Human Health in this Report
	Update references to earlier forest statistics reports with the most recent national forest statistics for 2022	The most recent National Forest Statistics Report was utilised throughout this Environmental Report
	Describe whether scheme such as The Native Woodland Conservation Scheme and the Neighbour Wood Scheme will be maintained and expanded upon over the lifetime of the Plan	For consideration by DAFM

Consultee/ Stakeholder	SEA Scoping Response	SEA Actions
	Included description of the circumstances where trees may be planted on organic soils (distinguish between legacy forests and new forests) and discuss afforestation and reforestation issues and environmental impacts	Refer to Interventions, Measures and Actions For consideration by DAFM
	Take the Draft Forestry and Freshwater Pearl Mussel Plan (DAFM) into account and provide an update of the status of this plan and its relationship with the implementation Plan being prepared	The Draft Forestry and Freshwater Pearl Mussel Plan (DAFM) has been taken into account through the duration of this SEA process Further, for the consideration of DAFM
	We suggest that providing for greater monitoring of the key issues, challenges and potential impacts facing biodiversity	Refer to Monitoring plan included in Section 9 of this ER
	Update forest statistics according to latest National Forest Statistics	The latest National Forest Statistics report has been utilised throughout this Environmental Report
	Page 42 of the scoping report in the last paragraph, the Ireland Forest Statistics should be attributed to the DAFM instead of the EPA	Updated in Section 5 6 2 of this ER
	In Section 4 6 1 we suggest that reference is made to the EPA's recently published Ireland's National Inventory Submissions for 2022 (EPA, 2022) Additionally, you should also include a reference to, and take account of Ireland's Provisional Greenhouse Gas Emissions 1990-2021 (EPA, 2022)	Noted Reference has been made to the EPA's Report Ireland's National Inventory Submissions for 2022 and Ireland's Provisional Greenhouse Gas Emissions 1990-2021 in Section 5 6 1 of this Report
	SEA and Plan should take account of the latest GHG projections (including LULUCF) and should consider the change in emissions due the stand maturity	Noted The latest GHG projections (including LULUCF) have been included in Section 5 6 1 of this Report Further, for the consideration of DAFM
	Section 4 6 1 1 should also take account of the impacts of ammonia deposition on trees, see IWM135 pdf (npws ie) for further information Additionally, where available, tables 4 6 1 1 and 4 6 1 2 should be updated to take account of more up to date data	Noted Section 5 6 1 1 of this Report has been updated on the basis of this Scoping comment The tables referred to have been taken from the most up to date data source, namely the Forest Statistics 2021 Report
	Figure 4 9 1 1 should be updated to reflect the latest energy statistics available from SEAI In addition, section 4 9 1 1 should also include an assessment of future energy needs	Noted Relevant updates have been made in Section 5 9 1 1 and Figure 5 9 1 1 1 has been updated
	References to forest harvest statistics should be updated to most recent data Forest Wood Removals 2021 from the Central Statistics Office In Section 4 10, in relation to the evolution of the baseline environment in the absence of the Plan, the first bullet on biodiversity should be amended as "Flora and fauna, habitats and ecological connectivity would potentially continue to be protected under existing provisions at legal and policy level"	Noted References to forest harvest statistics have been updated to the most recent data, Forest Wood Removals 2021 from the Central Statistics Office See Section 5 9 1 2 Noted and updated
	The Plan needs to address the issue of forestry activities on waterways and measure the trajectory towards full achievement of the Water Framework Directive objectives	Refer to Section 6 where Objectives, Targets and Indicators has been provided related to water and refer to Section 9 Mitigation and Monitoring also inclusive to water Further for the consideration of DAFM
	The potential impacts from forestry should also address the impacts of herbicides and pesticides on both water quality and biodiversity eg Cypermethrin In addition to monitoring for priority substances, substances of emerging concern are also included in the EPA WFD monitoring programme These substances include those from the EU Surface Water Watch List	Refer to Section 9 Mitigation and Monitoring a section has been provided for water

Consultee/ Stakeholder	SEA Scoping Response	SEA Actions
	In chapter 5: Use river catchments/river water bodies instead to attribute sensitivity to river water status	River water bodies have been used to attribute sensitivity to river water status in this ER
	Considering using additional sensitivity mapping tools, such as the Environmental Sensitivity Mapping to generate additional sensitivity mapping outputs and compare the outputs with those already generated	Noted Environmental Sensitivity Mapping was updated for this ER
	Quantifying the percentages of total area currently within each of the sensitivity categories provided	Noted
	Suggest that high status waters be assigned a value of "10" instead of "5", similar to the weighting assigned to poor water quality status waters, to reflect their overall environmental importance and relative sensitivity	Noted
	Where it is envisaged that Measures proposed in the Plan will be implemented via strategies and plans, which themselves have been or may be subject to SEA, this should be explained in the SEA Environmental Report and taken into account in the assessment	Noted- where further environmental assessment is envisaged, this has been explained in the Environmental Report
	Where specific Measures will be implemented directly, provide detail in the Environmental Report and Plan on the relevant environmental assessments and mitigation. It is recommended to explore this issue further with the relevant Environmental Authorities during the Plan preparation and SEA processes	Refer to Section 9 on Mitigation and Monitoring. All Measures in the IFSIP have been mitigated against and covered off through the Strategic Environmental Assessment detailed in this Report
	In Error! Reference source not found. – Environmental Objectives, Targets and Targets, the indicators could benefit from <ul style="list-style-type: none"> • Having a closer alignment between the respective targets that they measure • Taking account of changes in trends in environmental status • Review wording of targets and objectives 	The Objectives, Indicators and Target Table in Section 6 of this report has been reviewed and updated accordingly. Table 6.3.1 has since been updated.
	Provide information on quantitative/semi quantitative metrics are provided (increase in x or decrease in y for example) in Error! Reference source not found.	Quantitative/semi quantitative metrics included in so far as possible
	Under the 'Biodiversity, flora and fauna' component, mention protected habitats and species related to areas of forestry, that are outside of designated areas	Noted. This has been included in Error! Reference source not found. Biodiversity Section
	Consider including an associated target and indicator for the Safeguard areas of prime agricultural land and designated geological sites objective	Noted. This has been included in Error! Reference source not found. Objectives, Indicators and Targets
	In relation to the indicators for Water: "Status of water bodies as reported by the EPA Water Monitoring Programme for the WFD", amend to "Proportion of water bodies in forestry catchments meeting their WFD Ecological Status objectives, as reported by the EPA Water Monitoring Programme for the WFD"	Indicator has been amended in Section 6 of this ER
	An additional indicator: "The number of waterbodies that have deteriorated in ecological status or chemical status" could be considered	Additional Indicator has been included in Section 6 of this ER
	For 'Air, Noise and Climatic Factors' criteria, consider including an indicator associated with human health to reflect the objective of "To avoid, prevent or reduce harmful effects on human health and the environment as a whole resulting from emissions to air from transport". Clarify if this objective relates to the transport of forestry products or the manufacture of wood based products from forestry	Noted. The Objectives, Indicators and Target Table in Section 6 of this ER have been reviewed and updated accordingly in the Air, Noise and Climate Section

Consultee/ Stakeholder	SEA Scoping Response	SEA Actions
	Amended "The Forest Service policy will facilitate wind energy as much as possible, at suitable locations, within the context of environmentally sustainable forest management and efforts to expand the national forest estate " Consideration should also be given to slope stability in relation to landslide risk	Noted The Objectives, Indicators and Target Table in Section 6 of this report has been reviewed and updated accordingly
	Review for clarity the text of the 'Landscape' target : "No afforestation or development which results in avoidable adverse visual impacts on the landscape, especially with regard to landscape and amenity designations included in Land Use Plans, resulting from development which is granted permission under the draft Implementation Plan"	Wording of target updated - Refer to Section 6 of this ER
	The associated indicator "The number of conditions relating to landscape", should also be clarified	Indicators updated - Refer to Section of this ER
	Referred to EPA guidance "Developing and Assessing Alternatives in Strategic Environmental Assessment (SEA) " The SEA could also consider examining the different scenarios under which the alternatives support achievement of the national climate objective The reasons for selecting the alternatives considered should include a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information Include a summary of alternative considered and justification for selection of the preferred scenario Review EPA Guidance Practice Guidance Note on Cumulative Effects Assessment in Strategic Environmental Assessment (EPA, 2020)	Refer to Section 7 Alternatives Assessment EPA Guidance documents have been referred to and incorporated into the SEA ER
	Requirements of the SEA protocol under the ESPOO Convention should be taken into account, for any possible transboundary consultations with non-EU Member States	Requirements of the SEA protocol under the ESPOO Convention have been taken into account
	Consult with the relevant authorities under the SEA Regulations	The relevant authorities have been consulted with as part of the SEA Scoping process, and the SEA ER will be put on public display alongside the draft Plan
	Note in chapter 7 that the scoping for the SEA is dynamic and should continue to feed into the preparation of the SEA environmental report and draft Plan	Noted re Scoping- scoping responses have been incorporated into the SEA ER
	Publish a SEA Statement alongside the adopted Plan summarising the how environmental considerations have been integrated into the Plan, how the environmental report and consultation comments on it have been taken into account, the reasons for choosing the Plan as adopted, in the light of the other reasonable alternatives dealt with (in the Environmental Report and the associated consultation and the measures decided concerning monitoring	An SEA Statement will be prepared following finalisation of the IFSIP
	Refer to EPA published Guidance	EPA Guidance documents have been referred to and incorporated into the SEA ER
Department of the Environment, Climate and Communications	Provided a list of publicly available datasets that may be useful to the environmental assessment and planning process Recommend that list is reviewed, and datasets considered in SEa assessment The remainder of this letter and following sections provide more detail on some of these datasets Welcomed use of Geological Survey Ireland datasets in SEA Scoping maps	The datasets provided have been referred to or relied on in the undertaking of the SEA

Appendix C - Submissions on SEA ER

Table 4.5 Submissions on the IFSIP and SEA Environmental Report

Submission No.	First Name	Last Name	Organisation
149	Louise	Lennon	Irish Rural Link
148	Ashleigh	Doyle	CJ Sheeran
147	M J	J	
146	Katie	Holten	
145	Geraldine	O'Sullivan	IFA
144	Stephen Meredith	Meredith	Irish Organic Association
143			
142	Michael	Healy Rae	
141	Breian	Carroll	Agricultural Consultants Association (ACA)
140	Barry	O'Loughlin	
139	Simon	White	Limerick & Tipperary Woodland Owners
138	Elaine	McGoff	
137	Alan	O'Connor	
136	Mechteld	Schuller	Irish Timber Growers Association
135	Peter	O'Hara	
134	Rory	Greene	
133	Fintan	Kelly	Environmental Pillar
132	Padraic	Fogarty	Irish Wildlife Trust
131	Patrick	Glennon	
130	attracta	Ui Bhroin	IEN
129	Andrea	Glennon	
128	Attracta	Ui Bhroin	IEN
127	Emer	O'Siochru	
126	Martina	Glennon	
125	Patrick	Keegan	
124			
123	Trudi	Devereux	
122	Sophia	Glennon	
121	Billy	Glennon	
120	Sharon	Murray	
119	Sharon	Murray	
118	Coillte CGA	Coillte CGA	Coillte CGA
117	Sharon	Murray	
116	Mike	Glennon	Glennon Brothers Timber Ltd
115	Trevor	McHugh	Veon Ltd
114	Grainne	Fox	
113	Kevin	Barry	
112	Brianna	Caslin	
111	Janet	Treacy	
110	Dee	Caslin	
109	Dara	Caslin	
108	Flor	Crowley	
107	sean	Sheridan	
106	Paul	Smyth	
105	Oliver	Boylan	
104	Michael	Minchin	
103	Julie	Carrigy	
102	Brian	Murphy	
101	Brendan	Farrell	
100	Darina	Sheridan	
99	Ger	Reehill	
98	Seamus	Cox	
97	Breda	Heaney	

Submission No.	First Name	Last Name	Organisation
96	john paul	grey	
95	Mark	McAuley	Forest Industries Ireland
94	john	kenny	
93	Hilda	Grace	
92	Kate	Harrington	Trinity College Dublin
91	David	O Sullivan	
90	Daniel	Tadrzynski	
89	Tony	Lowes	Friends of the Irish Environment
88	Mohammad	Al Mawajdeh	
87	Mary	McCormack	
86	Dermot	Houlihan B Agr Sc (For) MSIF	AIFC
85	Denis	Siak	
84	David	Dunlea	
83	alastair	morris	
82	Giovanni	Valente	
81	Neil	Foot	MEDITE EUROPE
80	Neil	Foot	SMARTPLY EUROPE
79	Pat	Glennon	
78	Pat	Glennon	Glennon Brothers
77	Donal	O Keffe	
76	Rafal	Jurkiewicz	
75	Amal	Jose	
74	Piyush	Prakash	
73	Chris	Ryan	
72	Conor	Mc Goldrick	Balcas Timber Ltd
71	Maureen	Sage	
70	Damien	Cross	
69	Des	Gunning	
68	Tom	Sheil	
67	serena	keane	Irish Water
66	Andrew	Sheahan	
65	Ann	Walshe	
64	Dermot	Murphy	
63	Ethan	Farrell	
62	Paul	Treacy	
61	Stephen	McNeill	
60	Bryan	Crowley	
59	grace	murphy	
58	Margaret	Mulcahy	
57	Paulina	Frydryk	
56	Thomas	Campbell	
55	Ronan	White	
54	Milly	McDowell	
53	James	Doorley	
52	Julius	Brummelman	CELT
51	Nigel	Manley	
50	Julius	Brummelman	Abhainn Dá Loilíoch Woodland Group
49	Brigid	Barron	Castle Carraig Riding Club
48	Marina	Conway	Western Forestry Co-op
47	Christina	Park	Wexford Environmental Network
46	Robert	Hosey	
45	Rachel	Geary	LEAF Ireland, Environmental Education Unit of An Taisce
44	Therese	Hulse	
43	Soni	McEwen	
42	Professor Frank	O'Mara	
41	John P	O'CONNELL	
40	Mary	O'Connell	
39	Aine	Ni Dhubhain	ContinuFOR project team
38	John	Devane	
37	Raymond	Flynn	
36	Melanie	Smith	
35	Sean	Sheridan	
34	Neil	Foulkes	

Submission No.	First Name	Last Name	Organisation
33	Pat	O'Sullivan	The Society of Irish Foresters
32	Pat	O'Sullivan	The Society of Irish Foresters
31	John	O'Connell	
30	James	McCormack	
29	John	sharry	
28	Liam	O'Connor	
27	Sara	Broderick	Hometree Charity
26	Clive	Stoddart	
25	Richard	Latimer	
24	David	Minton	Northern and Western Regional Assembly
23	Shane	Grogan	
22	Ray	O Foghlú	
21	patrick and gemma	quinn	
20	Francis	Cassidy	Save West Cavan
19	Kate	McKenna	
18	Margaret	Duff Garvey	
17	Emma	McCarthy	Woodfab Timber Limited
16	Daniel	Harris	
15	Pat	Palmer	
14	Sheila	O'Connor	
13	Laura	McCarthy	
12	Olive	Leavy	Irish Forest Owners
11	Kieran	Brett	Leitrim County Council
10	Teige	Ryan	The Social Economic Environmental Forestry Association of Ireland
9	Dermot	McNally	
8	Edwin	Middleton	
7	Shane	Guerin	
6	Helen	O'Leary	
5	THOMAS	MORAN	
4	Gemma	Quinn	
3	M	King	
2	None So Hard (Forestry) Ltd	Nursery	None So Hardy (forestry) ltd
1	Brendan	Byrne	
150			BirdWatch Ireland
N/A			DAERA - NIEA
N/A			DHLGH - NPWS
N/A			DAFM staff
N/A			Historic Environment Division
N/A			The EPA
151	Gerhardt	Gallagher	

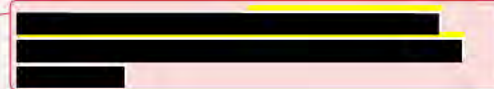
Table 4.6 Submission received on the IFS that relate to the IFSIP and SEA Environmental Report

Submission No.	First Name	Last Name	Organisation
1	Rory	Greene	
2	Joe	Gowran	Woodlands of Ireland
3	Sinead	O'Brien	Sustainable Water Network (SWAN)
4	Elaine	McGoff	An Taisce
11	Emer	O'Siochru	The Irish Biochar Cooperative Society Ltd
12	Coillte CGA	Coillte CGA	Coillte CGA
28	Justin	Warnock	Save Leitrim
29	Michaela	Kirrane	Inland Fisheries Ireland
35	Connie	Walsh	INHFA
48	Martha	O'Hagan-Luff	Trinity College Dublin & University of Galway
83	Eithne	Watson	

Submission No.	First Name	Last Name	Organisation
108	Evelyn	Moorkens	
N/A			Pro Silva Ireland Committee

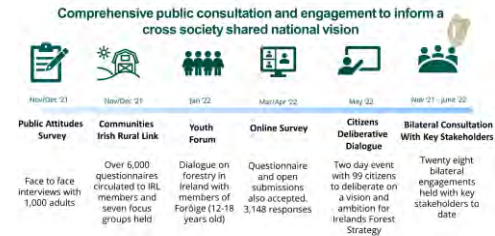
Table 4.7 Submissions received for the IFSIP as they relate to the SEA ER and the SEA Submission Responses

Submission summary, as it relates to SEA	Submission Responses
<p>Comment made in Appendix - Neil Foulkes submission:</p> <ol style="list-style-type: none"> 1. It would strike me that until the public consultation on the draft Irish Forest Strategy has been concluded and due consideration has been taken of the public feedback then any Implementation Plan, SEA Environment Report and /or Appropriate Assessment of the IFSIP are premature. Changes made to the Forest Strategy may impact on how the Plan can and will be implemented making that Plan and the current SEA Environment Report and Natura Impact Report obsolete. The IFSIP and the associated SEA and NIR must be based on the final adopted Forest Strategy, not the draft Forest Strategy. 2. The draft IFSIP is structured predominantly around forests for timber production with climate and biodiversity benefits more as incidental outcomes rather than as core values. This alternative weighting, directly in favour of the protection of biodiversity values, has not been considered as an alternative scenario in the SEA Report. 3. The Forestry Divisions screening procedures for Environmental Impact Assessment are seriously deficient and result in a blanket elimination of any sub-threshold project from the need for an EIA. The Forestry Division does not have a Standard Operating Procedure for its Inspectors in carrying out EIA Screening. The only consistency that seems assured is a tick in the box that says EIA is not required. As a matter of priority the Forestry Division must review and update its EIA Screening process. The SEA Environment Report is seriously deficient in its failure to properly scrutinise the Forestry Division's EIA Screening process for Afforestation and for Forest Roads. 4. Afforestation should only be considered if full life-cycle carbon accounting can evidence a net gain. Forest Road Works are responsible for significant GHG emissions but currently the Forestry Division does not require applications for Forest Road Works to contain any details of the emissions that will result from the project. This is a serious omission which is contrary to the requirements of the EIA Directive and is a major lacuna in the SEA Report. Applications for Forest Road Works must contain details of the GHG emissions that will result from the project and the Forestry Division must take these emissions into account when assessing the project (including cumulative impact). 5. Pesticides: The SEA Environmental Report and the NIR do not include any scientific evidence that this practice [pre-planting planting stock in pesticides] excludes the possibility of an effect on water quality or on Natura 2000 sites. How will crops be protected on sites with a high percentage of environmental setbacks where spraying is not permitted? There will be temptations to spray for pine weevil in areas on project sites with environmental sensitivities in order to protect the value of the future crop. There is a commercial incentive to spray where spraying should not be done. The Forestry Division does not have adequate protocols in place to monitor and enforce licence conditions related to pesticide use. The IFSIP must include a requirement for the Forestry Division to develop and implement a monitoring and enforcement protocol regarding the use of chemicals in forests. 6. Quality Control: Evidence of the decisions of the Forestry Appeals Committee consistently indicate that approximately two thirds of all forestry licences which are subject to appeal involve serious or a series of errors sufficient to require either modification, or the setting back, of the licence. This indicates a serious issue with quality control in the Forestry Divisions processes. Although the number of appeals has halved since the 200 euro fee which was introduced in October 2020 the proportion of successful appeals has remained around the same. This raises very serious concerns regarding the number of deficient licences which may well be passing through the system unchallenged. A factor which has not been considered in the SEA Environmental Report until the issue of licence quality is addressed. The implementation of the IFSIP should be delayed until a full review has been carried out of the quality control procedures employed by the Forestry Division which are resulting in such high rates of successful appeals. The Forestry Division's almost obsessive focus on achieving licencing output is a huge obstacle to quality control. The Forestry Division must prioritise licence quality over licencing output. 	<ol style="list-style-type: none"> 1. Consultation was carried out in accordance with Article 6(1) of the SEA Directive. According to Article 6(1), the draft plan or programme and the environmental report prepared in accordance with Article 5 (SEA Environmental Report) shall be made available to the authorities and the public. 2. As outlined in the EPA guidance document 'Developing and Assessing Alternatives in Strategic Environmental Assessment' (EPA, 2103), alternatives are defined as "different ways to deliver a plan or programme's objectives." Application of alternative environmental weightings are outside the scope of the SEA Directive. 3. Refer to new Chapter of IFSIP 'Environmental Safeguards' which provides an overview of the various environmental safeguards applied by DAFM as it executes its role regulating the Irish forestry sector and as it implements the Forestry Programme 2023-2027. It focuses on the safeguards in place during the licensing process relating to afforestation, forest road construction, tree felling (including reforestation) and the aerial fertilisation of forests, and related grant schemes. In this, the application process is examined, alongside the various components supporting it, including policies, procedures and protocols surrounding various environmental receptors. This chapter also includes other areas and activities DAFM is responsible for regulating or implementing and which are relevant to the protection of the environment, such as forest protection from pests and diseases, forest reproductive material, the National Forest Inventory, and forest research. 4. The SEA has identified that there is potential for negative effects on air and climate where forest roads are proposed, and appropriate relevant mitigation and monitoring measures are proposed. The SEA Environmental Report has been updated to include the following recommendation: "Applications for Forest Road Works must contain details of the GHG emissions that will result from the project and the Forestry Division must take these emissions into account when assessing the project (including cumulative impact)." 5. Refer to new Chapter of IFSIP 'Environmental Safeguards' which provides an overview of the various environmental safeguards applied by DAFM as it executes its role regulating the Irish forestry sector and as it implements the Forestry Programme 2023-2027. It focuses on the safeguards in place during the licensing process relating to afforestation, forest



7. Mitigation: There is so much work to be done before the new Forestry Programme, which is part of the IFSIP, will be remotely close to compliance with the full regulatory framework. The SEA Environmental Report and the NIR have not considered the practical timescales required for having everything necessary in place mitigation wise and how failure to have them done in time could impact on the environment in general and Natura 2000 sites in particular. DAFM currently has a request for tender RFT 226243 for provision of services to carry out a peer review of certain forest licence mitigation measures and carry out an AA/SEA process on these measures.
8. It is a core principle of the Aarhus Convention that increased public participation leads to better environmental outcomes. The Forestry Division is repeatedly acting in a manner that is deterring public participation in the licencing process and as a consequence the best environmental outcomes are not being achieved. The lack of detailed assessment of public participation opportunities represents a serious weakness in the SEA Report.

- road construction, tree felling (including reforestation) and the aerial fertilisation of forests, and related grant schemes. In this, the application process is examined, alongside the various components supporting it, including policies, procedures and protocols surrounding various environmental receptors. This chapter also includes other areas and activities DAFM is responsible for regulating or implementing and which are relevant to the protection of the environment, such as forest protection from pests and diseases, forest reproductive material, the National Forest Inventory, and forest research.
6. Submission is for attention of DAFM and is not relevant to the SEA process.
7. The mitigation measures set out in the SEA Environmental Report are all implementable within the timeframe of the IFSIP. The SEA Environmental Report also makes allowance for compliance with any future changes to environmental procedure, by stating that 'It is recommended that all legislation, policies, environmental requirements and guidelines outlined in this Environmental Report are adhered to. In addition, future legislation, policies, environmental requirements and guidelines should also be fully integrated into the IPFS and Environmental Report.'
8. Extensive public consultation was carried out in advance of preparing the National Vision and associated IFS and IFSIP- see below.



<p>1. The SEA takes an overly optimistic view of the planned expansion of forestry in Ireland, somewhat blind to the range of environmental issues it has given rise to date. It states that: "Increased Forest cover is likely to result in improved air quality and enhanced biodiversity, depending on tree suitability and appropriate sites however, an uncertain effect on land and soil and water is identified in that, sub-standard forestry operations have the potential to result in erosion, landslides, compaction, contamination, losses of soil organic matter, erosion, soil sealing, leaching, and changes in soil biodiversity." No justification is given to validate the assumption that biodiversity will be enhanced given the known negative impact of commercial forestry and increased forest cover on a range of semi-natural habitats and associated species in particular open habitat specialists and sensitive freshwater species. The existing framework of measures is inadequate to ensure that only "appropriate sites" are afforested and therefore the conclusions of the SEA are invalidated. The obvious need for species and habitat specific safeguards and planning tools such as forestry sensitivity mapping is missing from the mitigation measures.</p> <p>2. As is the case with the NIR, the assessment of the environmental impacts associated with the Implementation Plan is inadequate. The outlined mitigation measures are a mixture of the existing regime of measures that are currently failing to address the multitude of known impacts that the sector is having on biodiversity, water quality and climate plus, and a vague commitment that "many impacts will be more adequately identified and mitigated at project and EIA level." The fact that EIAs are virtually unheard of within the forestry licensing system due to the excessively high thresholds for a mandatory EIA and poor sub-threshold screenings gives us little confidence that project level mitigation will happen.</p>	<p>1. <i>The assertion that increased Forest cover is likely to result in... enhanced biodiversity, depending on tree suitability and appropriate sites' is supported and justified in Section 5.3 of the SEA Environmental Report. Section 5.3 outlines that "globally, forest habitats support more than half of all terrestrial species providing food, shelter and space to a range of plants, invertebrates, mammals and birds. Forest canopies are species rich terrestrial habitats supporting about 40% of invertebrate species, of which 10% are considered canopy specialists" and that "forest areas provide a variety of ecosystem services for biodiversity function." The statement subject to this submission also goes on to state that the potential for enhanced biodiversity is dependent on tree suitability and appropriate sites. The range of mitigation measures proposed will ensure that only suitable tree species and sites are planted, and that biodiversity is taken into account with all new planting.</i></p> <p>2. <i>As outlined in the SEA Environmental Report, a suite of environmental requirements, standards and guidance documents have been published by the DAFM. Adherence to these guidelines, environmental requirements and standards is the primary mitigation associated with the IFSIP.</i></p>
<p>It is my personal submission that the associated SEA Environmental Report and AA Natura Impact Report for the draft Forest Strategy Implementation Plan and programme are revised to take account of the concerns and omitted items. It is possible that the SEA and AA are not adequate because they do not cater for the concerns and omitted items including HNV, required project level assessment for Native Tree Areas, inadequate pre-emptive measures, interventions with amenity focus or features and recreation impacts.</p>	<p>1. <i>The SEA Environmental Report has been updated to take into account issues raised throughout the public consultation. For further reference to these issues refer to the to the Environmental Safeguards Chapter of the IFSIP. The Environmental Chapter details:</i></p> <ul style="list-style-type: none"> - Legacy issues; - Application processes and requirements in relation to regulated forest activities; - Forestry inspection processes; - iFORIS, iNET and QGIS systems; - Statutory referrals; - Public consultation; - Referral to ecology, the DAFM Archaeology Team and Engineering; - The Appropriate Assessment Procedure; - Assessment to Determine EIA Requirement; - Licensing conditions; - Requirements; - Mandatory 'guidelines' and other procedures; - Sanctions; - Register of Foresters and Forestry Companies; - Directory of Private Ecologists available for Forestry Projects;

	<ul style="list-style-type: none"> - Training for Registered Foresters and Consultant Ecologists; - Supporting technologies; - Environmental Receptors; - HNV Farmland, Hen Harrier, Breeding Curlew, Merlin, Freshwater Pearl Mussel; - Afforestation and Annex 1 habitats; - Afforestation and peat soils; - Afforestation and Article 17; - Felling and Reforestation Policy; - Fire Prevention and Control; - Forest health; - Forest Reproductive Material (FRM); - Ireland's National Forest Inventory (NFI); and Research relevant to forestry and the environment.
<ol style="list-style-type: none"> 1. The SEA overview of the current state of the environment and in particular the overview of the status of 'Biodiversity including Flora and Fauna' is woefully inadequate and fails to even cover the issues highlighted in the NIR, the scope of which is also inadequate 2. The Environmental Assessment of Forestry Programme is woefully inadequate For example, the assessment actually states that for Measure 1: Creation of Multi-Functional Forests "the purposes of this assessment, it is assumed that the baseline environment of the land to be forested is greenfield land or highly modified industrial cutaway peatlands undertaken on a pilot basis and limited in area" There is no conditionality within the scheme that would ensure that all sites are "greenfield" and the afforestation of cutaway bogs has the potential to negatively impact on a range of habitats and species 3. The assessment of the Forest Road Scheme claims bizarrely that constructing more roads "will also create opportunities to increase habitat and species diversity" The basement then concludes that the impact of the Forest Road Scheme will negatively impact biodiversity 4. In relation to the aggressive expansion in forest cover proposed the SEA states that "Increased forest cover is likely to result in improved air quality and enhanced biodiversity, depending on tree suitability and appropriate sites however, an uncertain effect on land and soil and water is identified in that, sub-standard forestry operations have the potential to result in erosion, landslides, compaction, contamination, losses of soil organic matter, erosion, soil sealing, leaching, and changes in soil biodiversity" This theme is repeated throughout the assessment i.e. all afforestation will positively benefit biodiversity and only infrastructure such as road construction is problematic No justification is given to validate the assumption that biodiversity will be enhanced given the known negative impact of commercial forestry and increased forest cover on a range of semi-natural habitats and associated species in particular open habitat specialists and sensitive freshwater species 5. The existing framework of measures is inadequate to ensure that only "appropriate sites" are afforested and therefore the conclusions of the SEA are invalidated The obvious need for species and habitat specific safeguards and planning tools such as forestry sensitivity mapping is missing from the mitigation measures As is the case with the NIR the assessment of the environmental impacts associated with the IFSIP is inadequate and the outlined mitigation measures are a mixture of the existing regime of measure that is currently failing to address the multitude of known impacts that the sector is having on biodiversity, water quality and climate plus and a vague commitment that "many impacts will be more adequately identified and mitigated at project and EIA level" The fact that EIAs are virtually unheard of within the forestry licensing system due to the excessively high thresholds 	<ol style="list-style-type: none"> 1. <i>The SEA overview of the current state of the environment relies on information contained within a number of published documents including but not limited to, Ireland's Environment' (EPA,2020) and Forest Statistics Ireland 2022' (DAFM, 2022).</i> 2. <i>The SEA has been updated to read "for the purposes of this assessment, it is assumed that only suitable land is forested, in accordance with the provisions of the document Land Types for Afforestation' (DAFM, 2017)</i> 3. <i>The assertion re. creation of opportunities to increase habitat and species diversity is contained within Intervention 3, Measure 1 and does not form part of the assessment commentary. DAFM to comment. Indeed, the SEA of this Measure identifies that there are potential for negative effects to occur on biodiversity.'</i> 4. <i>The assertion that increased Forest cover is likely to result in... enhanced biodiversity, depending on tree suitability and appropriate sites' is supported and justified in Section 5.3 of the SEA Environmental Report. Section 5.3 outlines that "globally, forest habitats support more than half of all terrestrial species providing food, shelter and space to a range of plants, invertebrates, mammals and birds. Forest canopies are species rich terrestrial habitats supporting about 40% of invertebrate species, of which 10% are considered canopy specialists" and that "forest areas provide a variety of ecosystem services for biodiversity function." The statement subject to this submission also goes on to state that the potential for enhanced biodiversity is dependent on tree suitability and appropriate sites. The range of mitigation measures proposed will ensure that only suitable tree species</i>

<p>for a mandatory EIA and poor sub-threshold screenings gives us little confidence that project level mitigation will happen</p>	<p><i>and sites are planted, and that biodiversity is taken into account with all new planting.</i></p> <p>9. <i>Refer to new Chapter of IFSIP 'Environmental Safeguards' which provides an overview of the various environmental safeguards applied by DAFM as it executes its role regulating the Irish forestry sector and as it implements the Forestry Programme 2023-2027. It focuses on the safeguards in place during the licensing process relating to afforestation, forest road construction, tree felling (including reforestation) and the aerial fertilisation of forests, and related grant schemes. In this, the application process is examined, alongside the various components supporting it, including policies, procedures and protocols surrounding various environmental receptors. This chapter also includes other areas and activities DAFM is responsible for regulating or implementing and which are relevant to the protection of the environment, such as forest protection from pests and diseases, forest reproductive material, the National Forest Inventory, and forest research.</i></p>
<p>All pages to review in relation to SEA - included some specific instances:</p> <ol style="list-style-type: none"> 1. The context for the current consultation and the EU law assessments required-In the first instance the manner in which the two consultations, one around the strategy, the other on the implementation plan, SEA and NIS have been launched and communicated has been very confusing There is no screening determination provided in respect of SEA or AA obligations on the Forestry Strategy which is the fundamental guiding document for the programme which is proposed to be implemented No rationale or legal justification is provided in respect of basing the SEA and AA in respect of the implementation plan only Given the very broad purposive approach of the Court of Justice of the European Union (CJEU) to the interpretation of obligations arising under the SEA directive – these deficiencies are a serious concern We also note the recent reference from the Supreme Court in respect of the SEA obligations arising in respect of the National Development Plan, neutral citation [2022] IESC 42 2. We also note that the Draft Forestry Strategy of 47 pages then arises additionally in the context of some 540 pages of text associated with the implementation plan, SEA report, appendices and NIS – all to be digested and responded to between 19 October and 29 November We do not consider that this short window is appropriate for the purposes of complying with the duty of providing for “effective consultation” given the complexity of issues which arise, the volume of information to be digested, and to facilitate the public adequately engaging to address the serious deficiencies in what is proposed In short we do not consider that “effective” participation and consultation has been provided for here in accordance with the obligations arising under the Aarhus Convention and the SEA Directive 3. We also question what screening determination and notifications have been provided in respect of obligations arising on Ireland in respect of transboundary impacts – in accordance with the Espoo Convention on Environmental Impact Assessment in a Transboundary context, and the intersection on non-discriminatory participation obligations arising for Ireland under Article 3 of the Aarhus Convention 4. We also note that the existing Forestry programme 2014-2020 was extended to 2022 without any consultation or screening determinations associated with this either We question the validity of that, and the requirement for 	<ol style="list-style-type: none"> 1. <i>A pre-screening exercise (applicability screening') in accordance with the EPA Guidance on SEA Screening was undertaken with regards the Forest Strategy. The findings of the applicability screening were that the SEA Directive does not apply to the Draft FS. The Draft FS is a type of plan or programme which does not fall within the remit of the SEA Directive / SEA Regulations. Due to the high-level nature of the Objectives, Values, Goals and Enablers outlined in the FS, along with the extensive timeframe that the Strategy will cover, it has been determined that the Draft FS does not place limits on the type of activity or development which is to be permitted in a given area; or conditions which must be met by the applicant if permission is to be granted; or are designed to preserve certain characteristics of the area concerned. Ultimately, it was determined that the Draft FS is too high-level to be subject to full SEA and does not define criteria or conditions which would guide the way a consenting authority determines an application for development consent of projects listed in the EIA Directive. As the SEA directive does not apply to the Forest Strategy, a formal SEA screening was not carried out and an SEA screening determination was not required.</i> 2. <i>The IFSIP and SEA ER were put on public display for a period of 6 weeks in accordance with the requirements of the SEA Directive</i> 3. <i>An SEA Scoping Report was prepared in advance of the SEA Environmental Report, in order to determine the scope of the</i>

<p>remedial assessment obligations particularly in light of the perpetuation over that extended period in particular of the current unsustainable forestry model Breaches of EU law require remedy the duty for which lies with the relevant public authority and emanation of the State Further the Aarhus Convention Compliance Committee issued a clear and unequivocal statement in the context of the pandemic that there is no derogation from the rights and obligations under the Convention The strategy is entirely silent on the legacy issue of entirely inappropriate forestry planted in entirely the wrong places At the same time positive aspects of natural native forestry are relied upon in the vague narrative – but in a context where the proposed allocations extend to an overwhelming 58% of proposed forestry being on monoculture conifers with a small and all too often poorly supported border of broadleaf species This all arises in the context of a strategy which is not rooted in any coherent, extant or credible land use strategy</p> <p>5. This issue is further compounded by the lack of any detail on the controls and assessment of proposals for large scale un-licensed forestry – consequent on the Animal Welfare, Forestry and Miscellaneous Provisions Act, 2022, which on the face of the legislation allows for unlicensed forestry of unlimited cover so long as it remains within 20 meters in width – and this is but one of the issues with this enacted primary legislation The SEA and AA for the regulations to allow for this – are nowhere extant – and create a serious issue for anyone trying to engage meaningfully and effectively in these consultations on the future of forestry in Ireland We note that “Appendix A Interaction with Relevant Plans, Policies and Programmes” to the SEA report states in respect of the Aarhus Convention that: “DAFM, as the competent Authority and publisher of the Draft IFSIP will comply with all aspects of the Aarhus Convention in the adoption of this plan ” We therefore call on the Department to address the issues set out below in order that such compliance can be provided for and for the relevant elements of the SEA report and the plan and strategy to be updated accordingly, and for the Minister to respond with the requested assurances promptly</p>	<p><i>SEA, in consultation with statutory authorities. The SEA Scoping Report was issued to the (Northern Ireland) Department of Agriculture, Environment and Rural Affairs as part of this process, in accordance with the EPA Guidance and SEA Directive.</i></p> <p>4. <i>This issue lies outside the scope of the SEA</i></p> <p>10. <i>Refer to new Chapter of IFSIP ‘Environmental Safeguards’ which provides an overview of the various environmental safeguards applied by DAFM as it executes its role regulating the Irish forestry sector and as it implements the Forestry Programme 2023-2027. It focuses on the safeguards in place during the licensing process relating to afforestation, forest road construction, tree felling (including reforestation) and the aerial fertilisation of forests, and related grant schemes. In this, the application process is examined, alongside the various components supporting it, including policies, procedures and protocols surrounding various environmental receptors. This chapter also includes other areas and activities DAFM is responsible for regulating or implementing and which are relevant to the protection of the environment, such as forest protection from pests and diseases, forest reproductive material, the National Forest Inventory, and forest research.</i></p>
<p>1 I would strongly recommend that the Implementation Plan, the NTS supporting the Strategic Environmental Assessment, and/or the Appropriate Assessment of the IFSIP are all prepared and finalised after both (a) public consultation on the draft IFSIP has been concluded and (b) due consideration has been given to the public feedback obtained via the public consultation Recommendation - The IFSIP and the associated SEA and NIR must be based on the final adopted Forest Strategy and not the draft Forest Strategy</p> <p>2. The draft IFSIP is formulated primarily on the basis of forests for timber production The draft IFSIP is not structured around climate change and biodiversity protection/enhancement as the primary objectives of the plan This alternative weighing, with climate change and biodiversity protection as the primary objectives of the plan, has not been considered as an alternative scenario in the Non-Technical Summary report dated 14 October 2022, which was prepared to support the Strategic Environmental Assessment of IFSIP</p> <p>3. Forest road works are responsible for GHG emissions, but currently the Forestry Division does not require forest road applications to include any information on the carbon emissions that will result from the project This is contrary to the EIA Directive (and EU law – Directive 2014/52/EU of 16 April 2014) Over the period from 2014 to 2021, around 1,748 km of forest roads were built (Forest Statistics Ireland 2022) – all without complying with Directive 2014/52/EU This issue is not addressed in the Non-Technical Summary report dated 14 October 2022 (‘NTS’)</p> <p>4. The Non-Technical Summary report dated 14 October 2022, prepared by Ove Arup to support the Strategic Environmental Assessment of IFSIP, refers to ‘peat’, ‘deep peat’ and ‘peatland’ None of these terms are defined in the Non-Technical Summary report</p> <p>5. The Non-Technical Summary report dated 14 October 2022, prepared by Ove Arup to support the Strategic Environmental Assessment of IFSIP is seriously deficient in its failure to properly scrutinise the Forestry Division’s EIA Screening process both for afforestation and for forest roads</p>	<p>1. <i>The draft IFSIP and draft SEA ER have been updated to final versions following public consultation</i></p> <p>2. <i>As outlined in the EPA guidance document ‘Developing and Assessing Alternatives in Strategic Environmental Assessment’ (EPA, 2103), alternatives are defined as “different ways to deliver a plans or programme’s objectives.” Application of alternative environmental weightings are outside the scope of the SEA Directive.</i></p> <p>3. <i>This issue is beyond the scope of the SEA.</i></p> <p>4. <i>A footnote has been added to the SEA ER to provide a description surrounding the use of the three terms</i></p> <p>11. <i>Refer to new Chapter of IFSIP ‘Environmental Safeguards’ which provides an overview of the various environmental safeguards applied by DAFM as it executes its role regulating the Irish forestry sector and as it implements the Forestry Programme 2023-2027. It focuses on the safeguards in place during the licensing process relating to afforestation, forest road construction, tree felling (including reforestation) and the aerial fertilisation of forests, and related grant schemes. In this, the application process is examined, alongside the various components supporting it, including policies, procedures and protocols surrounding various environmental</i></p>

<p>6 Hen harrier - The Green Zone / Red Zone (High Likelihood Nesting Area) applied by the Forestry Division does not apply the precautionary principle and, as a consequence, is not consistent with the requirements of Article 6(3) of the Habitats Directive as it does not exclude the possibility of disturbance. This is a significant weakness in the SEA Environmental Report and particularly the NIR.</p> <p>7 Appropriate Assessments routinely fail to consider that much planting stock (afforestation and reforestation) has been pre-dipped in pesticide which is being imported in to the project area. Pre-dipped plants are permitted to be planted in areas where top-up spraying is not permitted due to environmental setbacks. The SEA Environmental Report and the NIR do not include any scientific evidence that this practice excludes the possibility of an effect on water quality or on Natura 2000 sites.</p>	<p><i>receptors. This chapter also includes other areas and activities DAFM is responsible for regulating or implementing and which are relevant to the protection of the environment, such as forest protection from pests and diseases, forest reproductive material, the National Forest Inventory, and forest research.</i></p> <p>5. <i>This submission relates to the NIR and has been addressed separately.</i></p> <p>6. <i>This submission relates to the NIR and has been addressed separately.</i></p>
<p>1. The finalised version of the plan and SEA should ideally specify the need for focused research in the area of peatland restoration in currently forested peatland to further facilitate reestablishment of peat accumulating plant communities over larger areas, in preference to the establishment of other habitats. It is notable, following 2014, we are concerned that the plan's objectives may result in renewed planting on peatland (and other sensitive habitats). In order for the plan to comply with future conditions similar to those in SA 39783 2014/N, a more rigorous programme of habitat screening will need to be implemented as part of the plan and SEA.</p> <p>2. Irish bogs are naturally treeless and the planting of trees on them has negative impacts on the ecosystem services they provide. Past provision of state-aid has promoted the degradation of these services, at times in contravention of state aid conditions. Future forestry activities need to avoid further degrading these habitats, while promoting the restoration of those areas currently hosting forestry to peat accumulating plant communities. Available data on the impacts of forestry on peatlands suggest that these actions are unsustainable both from an economic and an environmental perspective.</p>	<p>1. <i>This issue is beyond the scope of the SEA.</i></p> <p>2. <i>Refer to new Chapter of IFSIP 'Environmental Safeguards' which provides an overview of the various environmental safeguards applied by DAFM as it executes its role regulating the Irish forestry sector and as it implements the Forestry Programme 2023-2027. It focuses on the safeguards in place during the licensing process relating to afforestation, forest road construction, tree felling (including reforestation) and the aerial fertilisation of forests, and related grant schemes. In this, the application process is examined, alongside the various components supporting it, including policies, procedures and protocols surrounding various environmental receptors. This chapter also includes other areas and activities DAFM is responsible for regulating or implementing and which are relevant to the protection of the environment, such as forest protection from pests and diseases, forest reproductive material, the National Forest Inventory, and forest research.</i></p>



<p>1. Peatlands: Sitka spruce plantations have no place on our bogs. There should be no new afforestation of peat soils and no reforestation of soils on deep peat indicated as being peat on both the soil and sub-soil layers in Teagasc soil mapping. The issue of carbon losses from peatlands that are drained and converted to forestry does not appear to have been addressed in the SEA Report. The Department and the forest industry needs to explain how it plans to operate without the current near-total reliance on fossil fuels.</p> <p>2. The SEA relies on existing mitigation measures as a basis for considering that the Plan will not impact negatively on water quality. EPA data indicated that Forestry is the greatest threat to High Status water bodies and that it is the third highest category in terms of Significant Pressure on water quality. How can this be the case if the current mitigations and their implementation and enforcement are adequate? There is very clearly a serious deficiency in the status quo and there is insufficient evidence in the Plan that this matter is being addressed. There is no evidence presented the water quality issues are as a result of legacy issues. It cannot be assumed. We don't know if water quality issues are down to poor standards, poor design, poor implementation, inadequate enforcement or a combination of these. There is a current project, HydroSED, looking at the efficacy of traditional measures for preventing siltation of waterbodies in forestry. If current measures are known to be effective there would be no point in this research. We don't know and the SEA cannot rely on unvalidated mitigations measures in DAFM Standards and Guidelines.</p> <p>3. Communities: The SEA has not addressed the negative impact on communities (and individuals) from inappropriate afforestation. There is a very narrow view taken that increased economic activity is the only criteria that needs to be assessed. The assessment in the SEA is not balanced or thorough. It is not the case that this Plan is beneficial for Public Health - there are multiple downsides to the physical and mental health of besieged communities from this Plan that have simply not been considered. Describe them from your perspective. Forestry and in particular forestry supports are having a serious distorting effect on land prices and land availability impacting on the sustainability of small farming communities.</p>	<ol style="list-style-type: none"> <i>The SEA Environmental Report has been updated to take into account potential carbon losses from peatlands where afforestation is proposed.</i> <i>Refer to new Chapter of IFSIP 'Environmental Safeguards' which provides an overview of the various environmental safeguards applied by DAFM as it executes its role regulating the Irish forestry sector and as it implements the Forestry Programme 2023-2027. It focuses on the safeguards in place during the licensing process relating to afforestation, forest road construction, tree felling (including reforestation) and the aerial fertilisation of forests, and related grant schemes. In this, the application process is examined, alongside the various components supporting it, including policies, procedures and protocols surrounding various environmental receptors. This chapter also includes other areas and activities DAFM is responsible for regulating or implementing and which are relevant to the protection of the environment, such as forest protection from pests and diseases, forest reproductive material, the National Forest Inventory, and forest research.</i> <i>The SEA Environmental Report has been updated to take into account the potential for both positive and negative effects on population and human health from afforestation. Section 8.4 – Cumulative Effects and the Key Issues listed under Chapter 5 – Section 5.2 Population and Human Health, in particular.</i>
<p>Comments were included within a copy of the SEA Report</p> <p>Multiple other documents were also included as part of this submission including some summary reports related to forestry. Documents included - Forestry related Aarhus issues, FLV doc, An assessment of EIA Screening for Forest Roads by the Forest Service, An assessment of EIA Screening for Afforestation by the Forest Service in the context of the EIA Directive, Afforestation on peat based soils under the Forestry Programme 2014-2020 Summary Report, Afforestation of lands mapped as Wetlands in Co Leitrim under the Forestry Programme 2014-2020 Summary Report, Afforestation of High Nature Value Farmland Summary Report, Afforestation in proximity to historic Curlew breeding locations Summary Report, Comments made on Standards for felling and reforestation doc - no mention of SEA report</p>	<p>This submission was reviewed in its entirety and the SEA Environmental Report was updated where appropriate. Updates made based on this submission include:</p> <ul style="list-style-type: none"> • Updates to Environmental Baseline description, including greater emphasis on potential negative effects if forestry on biodiversity • Inclusion of 'Key Environmental Issues' section after each baseline environmental description to further identify potential environmental concerns • Updates to the Alternatives Assessment- the Alternatives developed by DAFM were refined, and thus the assessment was expanded on
<p>1. Transboundary Impacts: The Assembly note that transboundary consultation is noted in the SEA. In view of the potential for significant planting in some border counties which share catchments with Northern Ireland, we would like to know how these might be assessed and considered in the iterative process. The Assembly when preparing its RSES did undertake transboundary consultation, the results of which it found to be beneficial in formulating its strategy.</p> <p>2. Infrastructure and Material Assets: The Assembly is conscious that increased population and associated land uses together with increased forestry will bring increased demands on infrastructure and material assets in our region. The analysis and consideration of the impacts on road transport networks does not have a prominent position in the draft strategies or the</p>	<ol style="list-style-type: none"> <i>The SEA Environmental Report has been updated to provide greater clarity surrounding potential transboundary effects</i> <i>The SEA Environmental Report has been updated to take into account the potential impacts of forestry on road networks</i>

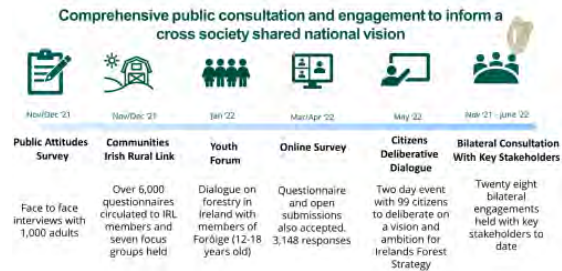
<p>environmental reports This is a significant omission and in order to fully assess the implications of increased forestry, it needs to be considered and assessed in a much more detailed and systematic manner with full public engagement to the fore</p>	
<p>Currently there is no consideration to the cumulative affects of afforestation As there is over 20% afforestation in many communities in west Cavan assessing only the new development is following a flawed pathway The proper way to evaluate the effects are by Environmental Impact Assessment (EIA) The forest service inspectorate only requires EIA when the planned afforestation project exceeds 50ha which is a threshold that is evade by making multiple smaller sized application</p>	<p><i>Section 8.4.1 of the SEA Environmental Report contains an assessment of the potential intra-plan cumulative effects, Section 8.4.3 of the SEA Environmental Report contains information on the potential inter-plan cumulative effects. This Section of the SEA Environmental Report has been updated to further strengthen this assessment.</i></p>
<p>1. In carrying out an SEA and NIR on the Draft IFSIP there is a suspicion that the Forestry Division has little or no intention of taking on board the responses to the public consultation on the draft Forest Strategy It would strike me that until the public consultation on the draft Irish Forest Strategy has been concluded and due consideration has been taken of the public feedback then any Implementation Plan, SEA Environment Report and /or Appropriate Assessment of the IFSIP are premature Changes made to the Forest Strategy may impact on how the Plan can and will be implemented making that Plan and the current SEA Environment Report and Natura Impact Report obsolete The IFSIP and the associated SEA and NIR must be based on the final adopted Forest Strategy, not the draft Forest Strategy</p> <p>2. The draft IFSIP is structured predominantly around forests for timber production with climate and biodiversity benefits more as incidental outcomes rather than as core values This alternative weighting, directly in favour of the protection of biodiversity values, has not been considered as an alternative scenario in the SEA Report</p> <p>3. As a matter of priority the Forestry Division must review and update its EIA Screening process The SEA Environment Report is seriously deficient in its failure to properly scrutinise the Forestry Division's EIA Screening process for Afforestation and for Forest Roads</p> <p>4. The sequestration potential of lands planned for afforestation must be made as part of the licence assessment process Sequestration from afforestation does not occur on a blank canvas Many HNV sites (especially on organic soils) are likely to be sequestering carbon to some degree already None of the emission sources indicated above apply to Emergent Woodland / Rewilding and many do not apply to other Forest Types Lack of full life-cycle carbon accounting is distorting the carbon implications of the different Forest Types in favour of commercial forestry with exotic species Afforestation should only be considered if full life-cycle carbon accounting can evidence a net gain Forest Road Works are responsible for significant GHG emissions but currently the Forestry Division does not require applications for Forest Road Works to contain any details of the emissions that will result from the project This is a serious emission which is contrary to the requirements of the EIA Directive and is major lacuna in the SEA Report Applications for Forest Road Works must contain details of the GHG emissions that will result from the project and the Forestry Division must take these emissions in to account when assessing the project (including cumulative impact)</p> <p>5. AA's routinely fail to consider that much planting stock (afforestation and reforestation) has been pre-dipped in pesticide which is being imported in to the project area Pre-dipped plants are permitted to be planted in areas where top-up spraying is not permitted due to environmental setbacks The SEA Environmental Report and the NIR do not include any scientific evidence that this practice excludes the possibility of an effect on water quality or on Natura 2000 sites</p> <p>6 Evidence of the decisions of the Forestry Appeals Committee consistently indicate that approximately two thirds of all forestry licences which are subject to appeal involve serious or a series of errors sufficient to require either modification, or the setting back, of the licence This indicates a serious issue with quality control in the Forestry Divisions processes Although the number of appeals has halved since the 200 euro fee which was introduced in October 2020 the proportion of successful appeals has remained around the same</p> <p>This raises very serious concerns regarding the number of deficient licences which may well be passing through the system unchallenged A factor which has not been considered in the SEA Environmental Report Until the issue of licence quality is addressed: The implementation of the IFSIP should be delayed until a full review has been carried out of the quality control procedures employed by the Forestry Division which are resulting in such high rates of successful appeals</p>	<p>1. <i>Consultation was carried out in accordance with Article 6(1) of the SEA Directive. According to Article 6(1), the draft plan or programme and the environmental report prepared in accordance with Article 5 (SEA Environmental Report) shall be made available to the authorities and the public. The SEA Environmental Report and draft IFSIP have been updated following public consultation, to take into account feedback from the public.</i></p> <p>2. <i>As outlined in the EPA guidance document 'Developing and Assessing Alternatives in Strategic Environmental Assessment' (EPA, 2103), alternatives are defined as "different ways to deliver a plans or programme's objectives." Application of alternative environmental weightings are outside the scope of the SEA Directive.</i></p> <p>3. <i>It is not within the scope of the SEA Environmental Report to scrutinise the Forestry Division's EIA Screening Process.</i></p> <p>4. <i>The SEA has identified that there is potential for negative effects on air and climate where forest roads are proposed, and appropriate relevant mitigation and monitoring measures are proposed. The SEA Environmental Report has been updated to include the following recommendation: "Applications for Forest Road Works must contain details of the GHG emissions that will result from the project and the Forestry Division must take these emissions in to account when assessing the project (including cumulative impact)."</i></p> <p>5. <i>Refer to new Chapter of IFSIP 'Environmental Safeguards' which provides an overview of the various environmental safeguards applied by DAFM as it executes its role regulating the Irish forestry sector and as it implements the Forestry Programme 2023-2027. It focuses on the safeguards in place during the licensing process relating to afforestation, forest road construction, tree felling (including reforestation) and the aerial fertilisation of forests, and related grant schemes. In this, the application process is examined, alongside the various components supporting it, including policies, procedures and protocols surrounding various environmental receptors. This chapter also includes other areas and</i></p>

7 Mitigation: There is so much work to be done before the new Forestry Programme, which is part of the IFSIP, will be remotely close to compliance with the full regulatory framework. The SEA Environmental Report and the NIR have not considered the practical timescales required for having everything necessary in place mitigation wise and how failure to have them done in time could impact on the environment in general and Natura 2000 sites in particular. DAFM currently has a request for tender RFT 226243 for provision of services to carry out a peer review of certain forest licence mitigation measures and carry out an AA/SEA process on these measures.

8 It is a core principle of the Aarhus Convention that increased public participation leads to better environmental outcomes. The Forestry Division is repeatedly acting in a manner that is deterring public participation in the licencing process and as a consequence the best environmental outcomes are not being achieved. The lack of detailed assessment of public participation opportunities represents a serious weakness in the SEA Report.

activities DAFM is responsible for regulating or implementing and which are relevant to the protection of the environment, such as forest protection from pests and diseases, forest reproductive material, the National Forest Inventory, and forest research.

6. Submission is for attention of DAFM and is not relevant to the SEA process.
7. The mitigation measures set out in the SEA Environmental Report are all implementable within the timeframe of the IFSIP. The SEA Environmental Report also makes allowance for compliance with any future changes to environmental procedure, by stating that 'It is recommended that all legislation, policies, environmental requirements and guidelines outlined in this Environmental Report are adhered to. In addition, future legislation, policies, environmental requirements and guidelines should also be fully integrated into the IPFS and Environmental Report.'
8. Extensive public consultation was carried out in advance of preparing the National Vision and associated IFS and IFSIP- see below.

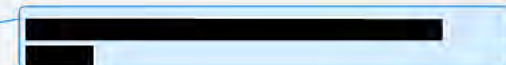


<p>1. National target for broadleaves is up from 30% to 35% and on a site by site basis from 15% to 20% This is an improvement but does not go far enough We need a program that supports native forest types The new Forestry Programme is very much a continuation of the old programme with minor concessions to more diversity We should be looking for at least a 50:50 target balance between conifers and broadleaves forest types nationally with a site by site requirement for a minimum of 30% broadleaves Failure to do this will result in an uneven balance across the country with the continued heavy preponderance of conifer plantations in the West The SEA does not address the issue of regional imbalance</p> <p>2. Areas for new planting is ad hoc based on where the applications come from There is no structured planning to the location of new afforestation In the absence of planned areas based on site sensitivity the SEA cannot reach any meaningful conclusions regarding cumulative environmental impact as the Plan has no framework for where any new planting will go; just a few vague rules for where it can't go</p> <p>3 The issue of emissions from forestry activities needs to be addressed Full life-cycle carbon accounting needs to be carried out for all forestry operations The issue of carbon losses from peatlands that are drained and converted to forestry does not appear to have been addressed in the SEA Report The Department and the forest industry needs to explain how it plans to operate without the current near-total reliance on fossil fuels</p> <p>4.The SEA relies on existing mitigation measures as a basis for considering that the Plan will not impact negatively on water quality EPA data indicated that Forestry is the greatest threat to High Status water bodies and that it is the third highest category in terms of Significant Pressure on water quality How can this be the case if the current mitigations and their implementation and enforcement are adequate? There is very clearly a serious deficiency in the status quo and there is insufficient evidence in the Plan that this matter is being addressed There is no evidence presented the water quality issues are as a result of legacy issues It cannot be assumed We don't know if water quality issues are down to poor standards, poor design, poor implementation, inadequate enforcement or a combination of these There is a current project, HydroSED, looking at the efficacy of traditional measures for preventing siltation of waterbodies in forestry If current measures are known to be effective there would be no point in this research We don't know and the SEA cannot rely on unvalidated mitigations measures in DAFM Standards and Guidelines</p> <p>5 Communities: The SEA has not addressed the negative impact on communities (and individuals) from inappropriate afforestation There is a very narrow view taken that increased economic activity is the only criteria that needs to be assessed The assessment in the SEA is not balanced or thorough It is not the case that this Plan is beneficial for Public Health - there are multiple downsides to the physical and mental health of besieged communities from this Plan that have simply not been considered I live beside a sitka spruce forest which was planted ten feet from my house Dealing with the management company has been a long protracted nightmare, no consideration for my wellbeing of me or my property was in their plan- this last year they finally cut a swath of the forest adjacent to my property that was a danger to my house, and as yet, one year later have done absolutely nothing to mitigate or clean up the site and put an active forestry right behind my house, despite regulations not to do so Living beside a forest has been hell, with no considerations for people who inhabit the area Our community bog was planted, and trees were planted right to the edge of the waterway, which is now a cesspool with fallen trees and destroyed waterways Forestry and in particular forestry supports are having a serious distorting effect on land prices and land availability impacting on the sustainability of small farming communities</p> <p>6. SEA: The SEA has not adequately considered alternatives - it has blinkered itself as to the options available and then considered the only reasonable option from the choices it has left itself with This is artificial There is an industry / timber production focussed interpretation of the IFSIP in the SEA Why has there not been an assessment of a Plan that puts greater emphasis on the biodiversity and climate elements of the Plan The SEA presents a very biased position in a number of areas which leads to a suspicion that there was a pre-determined outcome</p>	<p>1. For attention of DAFM- falls outside the scope of the SEA</p> <p>12. Refer to new Chapter of IFSIP 'Environmental Safeguards' which provides an overview of the various environmental safeguards applied by DAFM as it executes its role regulating the Irish forestry sector and as it implements the Forestry Programme 2023-2027. It focuses on the safeguards in place during the licensing process relating to afforestation, forest road construction, tree felling (including reforestation) and the aerial fertilisation of forests, and related grant schemes. In this, the application process is examined, alongside the various components supporting it, including policies, procedures and protocols surrounding various environmental receptors. This chapter also includes other areas and activities DAFM is responsible for regulating or implementing and which are relevant to the protection of the environment, such as forest protection from pests and diseases, forest reproductive material, the National Forest Inventory, and forest research.</p> <p>2. The SEA has identified that there is potential for negative effects on air and climate where forest roads are proposed, and appropriate relevant mitigation and monitoring measures are proposed. The SEA Environmental Report has been updated to take into account potential carbon losses from peatlands where afforestation is proposed</p> <p>13. Refer to new Chapter of IFSIP 'Environmental Safeguards' which provides an overview of the various environmental safeguards applied by DAFM as it executes its role regulating the Irish forestry sector and as it implements the Forestry Programme 2023-2027. It focuses on the safeguards in place during the licensing process relating to afforestation, forest road construction, tree felling (including reforestation) and the aerial fertilisation of forests, and related grant schemes. In this, the application process is examined, alongside the various components supporting it, including policies, procedures and protocols surrounding various environmental receptors. This chapter also includes other areas and activities DAFM is responsible for regulating or implementing and which are relevant to the protection of the environment, such as forest protection from pests and diseases, forest reproductive material, the National Forest Inventory, and forest research.</p> <p>3. The SEA Environmental Report has been updated to take into account the potential for both positive and negative effects on population and human health from afforestation. Section 8.4 –</p>
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	<p><i>Cumulative Effects and the Key Issues listed under Chapter 5 – Section 5.2 Population and Human Health, in particular.</i></p> <p>4. <i>The description of alternatives considered have been expanded on in the SEA Environmental Report.</i></p>
<p>1. The environmental assessments of the draft Forestry Programme fail to consider the impacts on the different measures on red and amber listed birds in the wider countryside. There is also woefully inadequate assessment of Annex 1 bird species in the wider countryside (e.g. geese and swans) in breach of Article 6.3 of the Habitats Directive and various European Court of Justice rulings. The Article 12 reporting research only extracted data relating to Annex 1 species that are qualifying interests of an SPA are considered in this AA report and what is reported is incorrect. Also unclear as to why the BoCCI status of Curlew, a red listed species for breeding and wintering has N/A status associated with Table 4 in the NIS. The BoCCI status for a range of red and amber listed species is listed as N/A with no rationale as to why. These should be listed.</p> <p>2. The cumulative impacts of afforestation, intensification of agriculture, peat cutting, wind farm development etc have not been adequately considered in the environmental assessments of the draft Forestry Programme.</p>	<p>1. <i>This submission relates to the NIR and has been addressed separately.</i></p> <p>2. <i>Section 8.4.1 of the SEA Environmental Report contains an assessment of the potential intra-plan cumulative effects, Section 8.4.3 of the SEA Environmental Report contains information on the potential inter-plan cumulative effects. This Section of the SEA Environmental Report has been updated to further strengthen this assessment.</i></p> <p>3. <i>It is considered that the updated SEA Environmental Report and NIR are fully compliant with the SEA and Habitats Directive, respectively.</i></p>



<p>3. Recommendations To the Irish government: The Minister must bring the SEA process into line with the requirements of the SEA Directive, amends the forestry plan and programme, reforms the screening system and takes coherent action to stop and reverse forestry-related deterioration of habitats crucial to open-habitat birds and other habitats important for nature conservation. Revise the environmental assessments so that they are in line with EU law and assess the impacts of the forestry programme on red and amber listed birds of conservation concern in Ireland and Annex 1 birds in the wider countryside</p> <p>4. Of most significant concern to BirdWatch Ireland is the failure of the authors of the draft Environmental Report to provide any assessment whatsoever of the impacts of the IFSIP on Birds of Conservation Concern in Ireland. This is not acceptable. In Appendix 2 we provide a spreadsheet which highlights the bird species selected according to habitat type and their interaction with forestry. This table was initially produced as part of the 2016 BirdWatch Ireland Bird Forestry Sensitivity Map Feasibility Study part-funded by the Forest Service. It was recently updated to account for changes in the BOCCI status of bird species but also as part of a risk assessment in response to the scale of the proposed state investment in the next IFSIP coupled with lucrative tax breaks could suggest that land previously considered as unattractive for afforestation could now become attractive further threatening bird species. Critically, we suggest that this type of table should be produced by the authors of the environmental assessment to ensure a comprehensive assessment as well as proven mitigation. Otherwise there are lacunae in the assessments</p> <p>5. In addition, the environmental impact of the proposed new forestry plan and programme is not properly examined in the SEA Report and falls short of what is required by the SEA Directive, 2001/42/EC. In Case C-418/04, Commission v Ireland, the Court of Justice handed down a ruling on the duty of EU Member States under Article 4(4), second sentence of the Wild Birds Directive to strive to avoid pollution or deterioration of habitats outside of special protection areas. This duty is especially important for open-habitat birds which depend to a great extent on the condition of habitats in areas</p> <p>6. Conclusions: Our conclusions are that the documents in consultation, in particular the SEA Report and the Natura 2000 statement, fail to assess impacts in accordance with the SEA Directive and the Habitats Directive. The evidence we submit shows that Ireland has failed and is failing to comply with the Birds Directive by causing deterioration of important bird habitats, in particular those used by open-habitat birds. It has also systematically failed to comply with environmental conditions of the last state aid decision, including those relating to avoidance of negative effects on areas of high ecological value, including high natural value areas used for farming. This failure is closely linked to a systematic failure to adequately screen afforestation projects under the EIA Directive, having regard to the requirement to take account of sensitive areas and cumulative effects. None of these failures are addressed in the SEA Report and this document also fails to present mitigation measures which would avoid similar negative effects arising under a new forestry plan and programme – or prevent non-compliance with state aid conditions similar to those that were set out in 2014 of high ecological value outside of SPAs. The Court referred to the need for a serious attempt to protect habitats found outside SPAs, and in paragraphs 190 and 191 explained that his implied targeted action and measures that constitute a coherent whole</p> <p>7. Since 2014, there have been no EIAs of the numerous afforestation projects approved in the areas of high ecological value for open-habitat birds. This is despite the fact that, following the ruling of the Court of Justice in Case C-392/96, Commission v Ireland, the responsible Minister is required to ensure that all sub-threshold afforestation projects are screened where they are likely to affect sensitive areas or have significant cumulative effects. The areas of high ecological value for open-habitat birds are objectively sensitive and are also very vulnerable to the cumulative effects of forestry. Clause 36 of the 2014 state aid decision stipulated that negative effects on areas of high ecological value including areas under high natural value farming were to be avoided. As is shown by previous research¹³¹⁴¹⁵ and the research presented in this submission, this requirement has not been respected – once again highlighting the deficiencies in screening. The ongoing failures described above are not addressed in the draft IFSIP SEA Report and the Report is not a reliable source of key information required to be provided under Annex 1 of the SEA Directive. To bring about</p>	<p>4. <i>The NIR has considered potential for effects on Birds of Conservation Concern. The SEA Environmental Report has been updated to cross-refer to the findings of the NIR.</i></p> <p>5. <i>It is considered that the updated SEA Environmental Report and NIR are fully compliant with the SEA and Habitats Directive, respectively.</i></p> <p>6. <i>It is considered that the updated SEA Environmental Report and NIR are fully compliant with the SEA and Habitats Directive, respectively. DAFM to provide text on existing framework of measures.</i></p> <p>14. <i>Refer to new Chapter of IFSIP 'Environmental Safeguards' which provides an overview of the various environmental safeguards applied by DAFM as it executes its role regulating the Irish forestry sector and as it implements the Forestry Programme 2023-2027. It focuses on the safeguards in place during the licensing process relating to afforestation, forest road construction, tree felling (including reforestation) and the aerial fertilisation of forests, and related grant schemes. In this, the application process is examined, alongside the various components supporting it, including policies, procedures and protocols surrounding various environmental receptors. This chapter also includes other areas and activities DAFM is responsible for regulating or implementing and which are relevant to the protection of the environment, such as forest protection from pests and diseases, forest reproductive material, the National Forest Inventory, and forest research.</i></p>
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<p>compliance, it is now imperative that the Minister brings the SEA process into line with the requirements of the SEA Directive, amends the forestry plan and programme, reforms the screening system and takes coherent action to stop and reverse forestry-related deterioration of habitats crucial to open-habitat birds</p>	
<p>1. The layout and content of the Environmental Report is well laid out and easy to follow DAERA SEA Team is content that the environmental report and the process of consultation follow the SEA Directive. A description of the current state of the environment and how this relates to the proposed Framework is included within the environmental report. Appropriate environmental objectives / targets / indicators for each of the likely environmental receptors is addressed including consideration of alternatives, an assessment of significant impact and complemented with mitigation measures and monitoring programme</p> <p>2. Natural Environment Division (NED) Comments: NED notes that the IFSIP is the implementation plan for another strategy, Ireland's Forestry Strategy 2022 - 2030 for which NED has previously responded to the Screening Report on 23rd September 2022. NED was not consulted, however, on the screening or scoping process for the current plan i.e. the IFSIP. NED considers that there is no definitive statement within the SEA dealing with transboundary issues. The only mention of transboundary effects is within the relevant plans and policies table (Appendix A) which states that transboundary issues should be taken into consideration. NED notes that mitigation measures within the SEA have taken functional linkage into account, e.g. preventing sedimentation of rivers, which could be a preventative measure for harm to the Northern Ireland environment. However, NED advises that a definitive statement is included in the SEA indicating the opinion about whether the implementation of the strategy is likely to have a significant effect on Northern Ireland, in combination with any identified measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment. The SEA Environmental report should consider all potential transboundary issues and we highlight the need for consideration of the following issues including the potential disturbance to/impact on NI/RoI migratory/mobile species. Priority habitats, river basins, and other landscape types in Northern Ireland adjacent to or with pathways to/from the Republic of Ireland, also require special attention as ecological functionality and 'views' of landscape cross political boundaries. The SEA should consider all potential impacts including those which may impact Northern Ireland both directly and indirectly</p> <p>3. NED notes that the SEA has made recommendations to plant trees on peatlands, specifically improved peatland and former industrial cutover peatland. NED would consider that this is likely to have implications for the environment by changing peatland habitat type and potentially releasing carbon. The plan and future projects emerging from it should be mindful of the carbon sequestration capabilities even of degraded peat and assessment should be carried out as suggested in the SEA to ensure planting is done appropriately and without carbon release or loss of carbon stores. Potential transboundary issues with this regard should also be addressed at project level and engagement with NI authorities sought should potential transboundary issues arise. In recent years bog slips from the Republic of Ireland have impacted on the rivers and other ecosystems in Northern Ireland. DAERA recommend that particular attention is given to the dangers of bog slips for any works that may impact bogs or other peatland sites which may be within the zone of influence that includes NI. Equally, any works or afforestation in proximity to NI may impact priority habitats and designated sites in NI including potential to impact NI peatlands, watercourses and river basins. Consideration should be given to the habitat condition as a whole i.e. on both sides of the border as the condition may vary across the habitat. While some areas of habitat may be potentially acceptable for proposed works or afforestation and not considered priority habitat or capable of</p>	<ol style="list-style-type: none"> 1. <i>Noted</i> 2. <i>The SEA Environmental Report has been updated to provide greater clarity surrounding potential transboundary effects. In accordance with "where the Plan or Programme (or modification) may significantly affect the environment in Northern Ireland, you should contact the Department of Agriculture, Environment and Rural Affairs at the following address: SEATeam@daera-ni.gov.uk" The SEA Environmental Report has been updated to provide greater clarity surrounding potential transboundary effects</i> 3. <i>The SEA does not recommend to plant trees on peatlands, but rather assesses the potential effects of same. The SEA has identified that there is potential for negative effects on air and climate where forest roads are proposed, and appropriate relevant mitigation and monitoring measures are proposed. The SEA Environmental Report has been updated to take into account potential carbon losses from peatlands where afforestation is proposed. Further, The SEA Environmental Report has been updated to provide greater clarity surrounding potential transboundary effects</i> 4. <i>The SEA Environmental Report has been updated to provide greater clarity surrounding potential transboundary effects</i> 5. <i>The SEA Environmental Report has been updated to provide greater clarity surrounding potential transboundary effects</i> 6. <i>The SEA Environmental Report has been updated to provide greater clarity surrounding potential transboundary effects</i> 7. <i>The SEA Environmental Report has been updated to provide greater reference to the use of fertiliser</i> 8. <i>Noted. The SEA Environmental Report has been updated to provide greater clarity surrounding potential transboundary effects</i>

recovery there may be potential for damage to habitat in NI e.g. any works or afforestation may impact the hydrology of adjacent good quality peatland habitat or priority habitats. For any works that may affect NI peatlands in anyway, engagement with NI authorities should occur at an early stage. NED note that the IFSIP is a high-level strategic plan that does not determine specific works, nor does it convey any permissions or licenses. NED advises that transboundary issues should also be included within the monitoring and mitigation section of the SEA. It is noted that AA and environmental assessments may be required as appropriate at project level and we advise continued and early engagement with the relevant bodies in NI should there be any potential transboundary effects on NI. We welcome proposed mitigation which can be considered at project level and should AA be required on such lower-level plans/projects.

4. Water Management Unit Comments: Water Management Unit can find no evidence that the potential for transboundary effects relating to the aquatic environment have been considered or a clear statement whether, or not, any potential impacts to the aquatic environment have been identified and the nature of those impacts as part of the SEA report. (Water Management Unit notes that as Ireland's Forest Strategy Implementation Plan (IFSIP) is national in scale, all European sites within the Republic of Ireland and relevant sites and receptors in Northern Ireland were considered as part of the AA screening and information on those sites included in the associated Natura Impact Report). Assessment should have considered potential transboundary issues in relation to the aquatic environment during all aspects / phases in relation to the implementation of IFSIP. This includes (but not limited to) the potential disturbance to/impact on NI/RoI migratory/mobile species such as salmon. Such species rely on, and can be impacted by, water quality and water resource issues. As IFSIP is at a national scale it is important that cross border river basins are given special attention as ecological functionality cross jurisdictional boundaries. Consideration must be given to all potential impacts including those which may impact Northern Ireland both directly and indirectly. Where potential transboundary effects are identified then cognisance should be taken of Northern Ireland's River Basin Management Plans. River Basin Management Plans are the key tools for implementing the Water Framework Directive and to achieving its objectives. DAERA has published the Draft River Basin Management Plan for the 3rd cycle period which runs from 2021-2027 which should be considered as part of the assessment. The draft plan provides an update on the health of Northern Ireland's water environment (the status of water bodies) and sets out our targets (objectives) and actions (programme of measures) on how we want to improve our water environment in the next six years. The draft plan covers the North Western, Neagh Bann and North Eastern river basin districts (RBD) and includes detailed status updates on each RBD. The documents can be downloaded from the consultation webpage: <https://www.daerani.gov.uk/consultations/consultation-draft-3rd-cycle-river-basin-management-plan-2021-2027>. It should be noted that the finalised 3rd Cycle River Basin Management Plans are due to be published later in 2022. A number of useful information sources are available that highlight the current state of the environment in Northern Ireland at a regional level which could be referenced including the Northern Ireland Environmental Statistics Report the latest of which is currently dated May 2022. When establishing a baseline, it is important that the most up to date information is used. Northern Ireland Environmental Statistics Reports: <https://www.daerani.gov.uk/articles/northern-ireland-environmental-statistics-report>. With regard to Northern Ireland Baseline Information and Data Sources DAERA have two map viewers in relation to the aquatic environment that may be of use, Water Information Request Web Viewer and NIEA Catchment Data Map Viewer both of which can be found at <https://www.daera-ni.gov.uk/articles/daera-map-viewers>. Water Management Unit notes and welcomes the identification of the most common water quality problems arising from forestry in Ireland are the release of sediment and nutrients to the aquatic environment and impacts from acidification. Water Management Unit also notes the issue of Cypermethrin raised by EPA in their scoping response. Where significant adverse impacts to the water environment are identified during the SEA process, appropriate mitigation should be identified. Effective mitigation measures must be in place to protect the water environment and surrounding water bodies from any discharge into them that may damage ecological status and to ensure that the Water Framework Directive objectives for the water body are not compromised nor the objectives in other downstream water bodies in the same and other catchments. Water Management Unit notes the mitigation measures.

<p>relating to the aquatic environment outlined in the report and recommends that these are fully implemented. Water Management Unit notes and welcomes the monitoring measures outlined in the report in relation to the aquatic environment. It is essential that interventions (including plan revisions where required) are undertaken if any unforeseen or adverse environmental effects to the aquatic environment are identified as a result of this monitoring.</p> <p>5. Drinking Water Inspectorate Comments: Upon review, DWI can find no evidence that potential transboundary effects on catchment areas and river basins (and subsequently, potential drinking water abstractions points) have been considered. As FSIP is a national scale plan, it is important to take into account cross border river basins as all catchments are considered as Drinking Water Protection Areas (DWPAs) under Article 7 of the Water Framework Directive. The nationwide basins are utilised by the primary Water Undertaker, Northern Ireland Water Limited (NI Water), to provide the public supply of water. DWI welcome that a SEA indicator will be the number of forests planted for drinking water source protection and drinking water quality monitoring will be completed by EPA.</p> <p>Furthermore, DWI are appreciative that the FSIP will align with the National Water Resources Plan which includes an objective on how to maintain the supply and demand for drinking water whilst minimising the impact on the environment.</p> <p>6. Landscape Team Comments: Landscape and Visual impacts have been addressed within the SEA targets. However, there is the potential for transboundary impacts on the Northern Ireland landscape which should also be assessed as part of the assessment, as afforestation proposals have the potential to change landscape character. There are a number of areas designated for their landscape quality located on or close to the border, such as Ring of Gullion Area of Outstanding Natural Beauty (AONB), that have the potential to be impacted by afforestation projects. The landscape around AONBs performs an important function by providing context, particularly in views to and from the AONB. Areas of Outstanding Natural Beauty all have their own management plans, for those potentially impacted by this scheme close to the border consideration of the management plan may be worthwhile. The following link details where additional information on the AONBs can be resourced; https://www.daera-ni.gov.uk/topics/landand-landscapes/areas-outstanding-natural-beauty. The Northern Ireland countryside has been divided into 130 Landscape Character Areas (LCAs), each based upon local patterns of geology, landform, land use, cultural and ecological features. The key characteristics are described and an analysis of landscape condition and its sensitivity to change are also included. The Northern Ireland Landscape Character Assessment 2000 (NILCA 2000) should be consulted for any potential impacts from afforestation in border areas. The NILCA 2000 complements the wider NI Regional Landscape Character Assessment, by providing more detailed local studies, the Regional Landscape Character Assessment, could also be referred to in the assessment. The following link details the Northern Ireland Regional Landscape Character Assessment and Northern Ireland Landscape Character Assessment 2000; https://www.daera-ni.gov.uk/articles/landscape-character-northern-ireland. The NIEA Map Viewer may be of use in identifying NILCA 2000, NI Regional Landscape Character Assessment (NIRLCA) locations and AONBs, located in border areas that may be impacted by transboundary landscape and visual impacts (https://www.daera-ni.gov.uk/services/natural-environment-map-viewer).</p> <p>7. Air Quality & Biodiversity Unit (AQBU) Comments: AQBU acknowledge the draft objectives and targets highlighted to avoid, prevent and reduce harmful effects on the environment resulting from emissions to air from transport (Final SEA Environmental Report, page 47-48). AQBU recommend that consideration should be made to the use of organic or inorganic fertiliser in the planting, establishment and maintenance of the planted areas. Fertiliser has potential to release aerial emissions which can have toxic effects close to sensitive habitats and longer range effects through nitrogen deposition. Use of fertiliser has been highlighted on Page 28 of the SEA Environmental Report; "An increase in the use of synthetic fertilisers leads to an increase in nitrous oxide emissions" although AQBU consider it should be considered more fully within the SEA Table 6.1. If fertiliser use is planned in vicinity of protected, sensitive, priority habitats in Ireland/NI, the potential air quality impact of fertiliser use should be considered.</p>	
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<p>8. Marine Plan Team Comments - Marine Conservation Advice response on SEA report: MCA welcomes the consideration of 'invasive species' in Section 5 3 MCA recommends also considering Seascape in Section 5 8 where Forestry works are planned near Lough Foyle and Carlingford Lough:</p> <ul style="list-style-type: none"> • Atlantic Regional Seascape Character Area (RSCA) • Lough Foyle RSCA • Foyle Estuary RSCA • North Coast Strands and Dunes RSCA • The Skerries and Dunluce Coast RSCA • Carlingford Lough RSCA • Mourne Coast RSCA <p>Northern Ireland Regional Seascape Character Assessment MCA welcomes the consideration of Northern Ireland's protected areas in Figure A4: Natura 2000 sites in the Republic of Ireland (National Parks and Wildlife Service) and Northern Ireland MCA recommends considering the following plans, policies and legislation, listed above, where the Forest Strategy is to be implemented in close proximity to Carlingford Lough and Lough Foyle</p>	
<ol style="list-style-type: none"> 1. Fish populations are sensitive to reductions in water quality, particularly siltation, aquatic ecology can be impacted not only in the immediate area of works but also significant distances away (transboundary) unless comprehensive mitigation measures are applied Inland Fisheries notes that Water Management Unit (NIEA) have contributed to this consultation in relation to water quality issues and are content with their comments and nothing further to add in this regard Inland Fisheries notes that potential impacts to transboundary species fish do not appear to have been specifically considered within this document Inland Fisheries notes the nature of the strategy and its' geographical location which is very likely to encompass transboundary catchments These catchments are also likely to maintain populations of migratory fish species such as salmonids, eels and lamprey; these species require access to various habitat types to fulfil their lifecycle 2. Outside of water quality issues several aspects of forestry have the potential to impact habitats within watercourses, forestry is often located in the upper catchments of rivers where salmonid spawning is likely to occur <ol style="list-style-type: none"> i The construction of roads to facilitate access to areas has the potential to reduce the amount of habitat and also habitat connectivity River crossings and especially culverts can create barriers to fish migration ii Structures built within watercourses to redirect or impound water also have the potential to create barriers to fish migration iii 'Clearing' of streams to increase drainage can remove the substrate from rivers and streams effecting viable habitats iv Removal of riparian vegetation can lead to increased temperatures in water and increased weed growth impacting viable habitats v Windthrow and post-felling debris has the potential to impact spawning beds vi As mentioned previously sedimentation has the potential to degrade spawning beds and also impacts trout and salmon eggs' development 3. The prevention of any loss of habitats or fragmentation does appear to have been considered as a potential impact, however aquatic habitats should be specifically referenced in table 6 1 Inland Fisheries welcomes the consideration of the construction and design of watercourse crossings, and the consultation on these with IFI within the mitigation measures outlined in table 9 1 Inland Fisheries would again recommend that aquatic habitats be referenced under 'Draft SEA Indicators' in Table 9 2 1 , it is welcomed however that 'Fish Habitat and ecology surveys' are to be carried out with IFI being the responsible authority Inland Fisheries would also recommend 	<ol style="list-style-type: none"> 1. <i>The SEA Environmental Report has been updated to provide greater clarity surrounding potential transboundary effects</i> 2. <i>The SEA Environmental Report has been updated to take into account the listed effects on habitats within watercourses.</i> 3. <i>Table 6.1 of the SEA Environmental Report has been updated to include prevention of any loss of habitats. The SEA Indicators in Table 9.2.1 have been updated to take into account aquatic habitats. Table A.2 in Appendix A has been updated to include reference to - North Atlantic Salmon Conservation Organisation (NASCO), Convention for the Conservation of Salmon in the North Atlantic Implementation Plan for the period 2019 – 2024</i> 4. <i>Noted</i> 5. <i>The SEA Environmental Report has been updated to provide greater clarity surrounding potential transboundary effects. The reference to 'aquatic' under the Biodiversity Objective has been updated with a footnote to clarify this means marine and riverine aquatic biodiversity.</i> 6. <i>The SEA Environmental Report has been updated to take into account the listed effects on habitats within watercourses and the SEA Environmental Report has also been updated to provide greater clarity surrounding potential transboundary effects. Table A.1 in Appendix A has been updated to include reference to - North Atlantic Salmon Conservation Organisation (NASCO), Convention for the Conservation of Salmon in the North Atlantic Implementation Plan for the period 2019 – 2024 and other relevant marine related plans, policies, and programmes</i>

<p>that Appendix A, Table A 2, should include reference to - North Atlantic Salmon Conservation Organisation (NASCO), Convention for the Conservation of Salmon in the North Atlantic Implementation Plan for the period 2019 – 2024, this an international commitment for both Northern Ireland (as part of the UK) and ROI and should be included as this policy has the potential to impact this species and the goals of this plan</p> <p>4. As a statutory consultee Inland Fisheries will continue to consult on any planning applications made by participants in any subsequent program or plan derived from this strategy that may have potential transboundary impacts The Loughs Agency is the lead body for provision of advice regarding impacts to salmonid and inland fisheries interests within the catchments of Lough Foyle and Carlingford Lough Consequently, said agency should also be consulted in relation to this SEA Screening report</p> <p>5. Marine Plan Team Comments: <i>Current State of the Environment</i>- It is observed that no transitional or coastal water bodies are monitored within the Forestry Operational Sub Network of WFD monitoring programme (Table 5 4) 2019- 2021 The Report also acknowledges that the release of sediment and nutrients into the aquatic environment and impacts from acidification are the most common problems arising from forestry Given the hydrological linkages of lakes, rivers and the sea, it is suggested the Water component within this chapter (Section 5 5) draws out the relationship between forestry and the Marine Strategy Framework Directive (MSFD) and the achievement of good environmental status This would provide transparency, link with the SEA Objectives chapter and support any conclusions regarding transboundary marine effects In coastal waters both MSFD and WFD apply Some issues addressed by MSFD are not addressed by WFD, such as impacts on marine noise, litter, certain aspects of biodiversity and ensuring concentrations and effects of contaminants are kept within acceptable levels <i>SEA Objectives</i> MPT welcome the references to aquatic and the Marine Strategy Framework Directive within the Biodiversity and Water draft SEA Objectives This ‘marine proofing’ ensures effects on the marine environment and any potential transboundary marine effects are openly considered as part of the assessment However, it is recommended, in the interests of clarity, the reference to ‘aquatic’ under the Biodiversity Objective includes the marine aspect <i>Environmental Assessment of Significant Effects and Mitigation Measures</i> The MPT welcome the SEA recommendation the FSIP incorporates a number of mitigation measures Of note, are those that state applications for schemes, the provision of forest facilities and amenities and proposals for new planting or new forests are subject to the appropriate assessment procedure / suitable environmental assessment, where required</p> <p>6. <i>Appendix A</i> The absence of specific marine related relevant plans, policies, and programmes such as the EU Directive of Maritime Spatial Planning, MSFD and other marine planning legislation and policy, is noted <i>Conclusion</i> It is observed, the FSIP is unlikely to have a significant effect on the marine area and its environment Consequently, MPT conclude the potential for any significant transboundary marine effects with Northern Ireland waters, particularly in the shared loughs of Lough Foyle and Carlingford Lough, are also unlikely The Report would have benefited from some explicit commentary on marine effects and marine transboundary effects in shared waters, thereby <u>improving its transparency</u></p>	
<p>1. p7-3rd paragraph: Intervention 8: Reconstitution - This proposed Intervention deals with restoring forest damage by natural causes This proposal needs to be expanded to cover funding for removal of trees that may have been planted in inappropriate locations and led to adverse environmental effects</p> <p>2. p16 Current State of the Environment 5 3 Biodiversity including Flora and Fauna - 2nd par: “Research has shown that establishing plantation forests on improved and semi-improved grasslands will be neutral or positive for biodiversity” This is a rather simple statement that requires further discussion to provide context Biodiversity value can be measured in different ways and some elements of biodiversity can be negatively affected for example by plantation forests being planted on grassland used by breeding, feeding, roosting and overwintering birds</p>	<p>2. <i>For attention of DAFM.</i></p> <p>3. <i>SEA Environmental Report has been updated to outline potential negative effects of forestry on biodiversity.</i></p> <p>4. <i>Information contained in Table 5.4 is based on published information from: NPWS, 2009; DAFM, 2017; DAFM, 2020; Irish Wildlife Trust, 2018 and Forestry Focus, 2022, this comment has been noted.</i></p> <p>5. <i>Refer to the Environmental Safeguards Chapter of the IFSIP for further information.</i></p>

<p>3. Row 5 “All new forests established must have a minimum of 15% broadleaves planted” It is advised that a distinction be made between native and non-native broadleaves</p> <p>4. Row 2, Reforestation, deals with a requirement to replant but states “Some sites may not be reforested if there are overriding environmental considerations” Whilst this advice is welcomed, it refers only to the time of harvesting and it is suggested that there should be a reference to identifying and deforesting problem areas before environmental issues arise</p> <p>5. - p19, row 1: The list of types of native woodland is rather limited and may suggest that these are the only important species in native woodlands Other species such as Scots pine, aspen, yew, cherry (bird and wild), holly, Sorbus species, crab apple should be referenced in the context of native woodland species</p> <p>6. row 1, refers to “Legally protected” species in Ireland and lists a wide range of invertebrates including 45 bee species, 12 butterflies, 5 damselflies and dragonflies These are not covered by the Wildlife Acts or other nature conservation legislation and it is requested that the description of these being “protected” be revised to address this inaccuracy</p> <p>7. p24 5 4 Land and Soils - It is stated that suitable land for GPC 2-12 in Ireland includes: “Areas of Midland fen peats that have been improved, and peats previously reclaimed for agriculture and now supporting rush pasture vegetation” It is our view that such habitats may be net carbon emitters even after afforestation and this proposal would need to be assessed to see if rewetting is a preferred option This issue is dealt with satisfactorily elsewhere but needs to be stated here It is suggested that this text is revised to state “areas of midland fen peats that cannot be wetted”</p> <p>8. - p25-26 Text referencing “The Forest Service Environmental Requirements for Afforestation” is of significance and is relevant to many factors in the plan and assessments; it deserves explanation in detail in the draft Plan Further explanation of the assessments referred to in this section could address many of the concerns raised in this submission by the Department</p> <p>9. P44 Table 6 1 SEA Objectives, Indicators and Targets: Biodiversity - 1st bullet point “Preserve, protect, maintain and, where appropriate enhance terrestrial, aquatic and soil biodiversity” We suggest adding the word “restore” also i e “where appropriate, enhance or restore”</p> <p>10. - 1st bullet point for targets states “no loss of protected habitats” We advise that the term “protected” be defined, as there are different levels of protections afforded by different legislation</p> <p>11. - 3rd bullet point objectives (similar to comment above) “protect species outside these areas covered by the Wildlife Act” The Wildlife Act offers limited protection in cases concerning forestry proposals so we would recommend amending this term to “protected and threatened” and remove reference to the Wildlife Act</p> <p>12. - 3rd bullet point in targets: “No ecological networks or parts thereof which provide significant connectivity between areas of local biodiversity to be lost without remediation” It is recommended that a more positive target “Creation of new connectivity between areas of local biodiversity”, since the draft Plan does facilitate, target and reward such measures so it warrants mention here</p> <p>13. - 5th bullet point in objectives: We recommend an additional target here “Identify and promote areas for appropriate afforestation to provide connectivity between separated woodland habitats</p> <p>14. - 6th bullet point objectives: We recommend an additional target here “Where ecologically appropriate, enhance areas surrounding and adjoining designated sites by creating supporting habitats through appropriate afforestation and associated measures”</p> <p>15. - 5th point in targets refers to “particularly where they are proposed in/and/or near European Sites” We recommend an amendment to bring it closer to legislation “where they may affect European Sites”</p> <p>16. - Points 7-8 in SEA Indicators should include “Area of native woodland restored” and “Area of invasive species removed”</p>	<p>6. SEA Environmental Report has been updated to outline the additional native tree species listed in this submission.</p> <p>7. SEA Environmental Report has been updated for clarity on the species listings in Table 5.4.</p> <p>8. SEA Environmental Report has been updated to include the suggested text amendment.</p> <p>9. Further reference to this document has since been incorporated into the IFSIP within the Environmental Safeguards Chapter.</p> <p>10. SEA Environmental Report has been updated to include the suggested text amendment.</p> <p>11. SEA Environmental Report has been updated with a footnote defining the term protected.</p> <p>12. SEA Environmental Report has been updated to include the suggested text amendment.</p> <p>13. SEA Environmental Report has been updated to include the suggested text amendment.</p> <p>14. For the attention of DAFM. This comment relates to the IFSIP more than the Objectives, Targets and Indicators outlined in the SEA ER. Strategic Environmental Objectives (SEOs) are methodological measures against which the environmental effects of the draft Plan can be assessed. The SEA Directive requires that the evaluation of the draft Implementation Plan be focused upon the relevant aspects of the environmental characteristics of areas likely to be significantly affected. In compliance with this requirement the SEA will focus upon the most relevant aspects of the environmental characteristics. The SEOs are linked to indicators which can facilitate monitoring the environmental effects of the draft Implementation Plan as well identifying targets which the draft Plan can help work towards.</p> <p>15. For the attention of DAFM. This comment relates to the IFSIP more than the Objectives, Targets and Indicators outlined in the SEA ER. Strategic Environmental Objectives (SEOs) are methodological measures against which the environmental effects of the draft Plan can be assessed. The SEA Directive requires that the evaluation of the draft Implementation Plan be focused upon the relevant aspects of the environmental characteristics of areas likely to be significantly affected. In compliance with this requirement the SEA will focus upon the most relevant aspects of the environmental characteristics. The SEOs are linked to indicators which can facilitate monitoring the environmental effects of the draft Implementation Plan as well identifying targets which the draft Plan can help work towards.</p>
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<p>17. - Point 10 in targets should include sediment loss i e Reduced incidents of eutrophication/water pollution, sediment loss</p> <p>18. p45 Table 6 1 SEA Objectives, Indicators and Targets: Biodiversity - 2nd point in targets is to identify invasive species and to develop techniques for control It is recommended that a commitment be made to carrying out such control</p> <p>19. We recommend the addition of a new objective “Where legacy issues have caused ecological damage or where legacy issues are causing ongoing ecological damage, appropriate measures will be established to address this and where possible stop ongoing damage and restore habitats” This needs to be a standalone measure and not just related to scheduled re-afforestation after felling</p> <p>20. We recommend the addition of a new objective clarifying that areas of historic woodland as per historical mapping will be replanted with native woodland (as they would have been originally) and that such areas where they have been Cleared, are targeted/incentivised for woodland re-establishment This is stated in the draft Plan for replanting on conifer sites but no obvious commitment for other undeveloped lands where historic woodland area has been noted</p> <p>21. p47 Table 6 1 SEA Objectives, Indicators and Targets: Water - 1st point Objectives: Reference should be made to addressing existing and ongoing sedimentation or hydrological issues and include a commitment to closure of drains and retrospective establishments of aquatic zones where deemed appropriate</p> <p>22. We recommend an additional target - Where wetlands have been historically inappropriately afforested measures will be developed so they may not be replanted after harvesting and procedures will be put in place where it is possible to intervene where sites need to be deforested to achieve environmental (including ecological) benefits</p> <p>23. p57, Table 8 2 Environmental Assessment of Forestry Programme - intervention and Measures: Intervention 1 Forest Creation - Measure 3: “Native Woodland Intervention for Remediation of Industrial Cutover Peatlands Pilot Scheme” Many of these sites are important for a wide range of biodiversity Rewetting of peat and peatland restoration should be prioritised over woodland intervention on such sites and even sites that cannot be rewetted could potentially support adjoining wetlands This intervention requires a site-specific assessment to determine suitability of the intervention in terms of the potential for other re wetting and restoration measures The carbon storage aspects of this intervention also need to be considered</p> <p>p60 Environmental Assessment of Forestry Programme - Intervention and Measures:</p> <p>24. Row 1- 1st point: We welcome this proposal for constructed wetlands as part of forest works and encourage these features to be significant in terms of size - Preference should be stated for bridges rather than culverts - “Larger (water) storage features located away from surface obstructions will be designed to accommodate aerial firefighting in high risk areas” A similar measure should be used to address problematic forestry drainage located along roads and general field drainage causing sediment loss</p> <p>25. p64 Table 8 2 Environmental Assessment of Forestry Programme - Intervention and Measures: - We would recommend an additional new bullet point: “Establishment of aquatic zone if none present already”</p> <p>26. p68 Table 8 2 Environmental Assessment of Forestry Programme - Intervention and Measures: - “SEA Comments” re Measure 3 Coppicing- Coppicing might be a concern and undesirable in some woodlands so application of this measure needs to be carefully selected with a requirement for ecological input</p> <p>27. p75 Table 8 2 Environmental Assessment of Forestry Programme - Intervention and Measures: - Reforestation for Biodiversity and Water Protection- mentions “widely spaced” it Should be clear that</p>	<p>16. SEA Environmental Report has been updated to include the suggested text amendment.</p> <p>17. Noted.</p> <p>18. SEA Environmental Report has been updated to include the suggested text amendment.</p> <p>19. For the attention of DAFM. This comment relates to the IFSIP more than the Objectives, Targets and Indicators outlined in the SEA ER. Strategic Environmental Objectives (SEOs) are methodological measures against which the environmental effects of the draft Plan can be assessed. The SEA Directive requires that the evaluation of the draft Implementation Plan be focused upon the relevant aspects of the environmental characteristics of areas likely to be significantly affected. In compliance with this requirement the SEA will focus upon the most relevant aspects of the environmental characteristics. The SEOs are linked to indicators which can facilitate monitoring the environmental effects of the draft Implementation Plan as well identifying targets which the draft Plan can help work towards.</p> <p>20. For the attention of DAFM. This comment relates to the IFSIP more than the Objectives, Targets and Indicators outlined in the SEA ER. Strategic Environmental Objectives (SEOs) are methodological measures against which the environmental effects of the draft Plan can be assessed. The SEA Directive requires that the evaluation of the draft Implementation Plan be focused upon the relevant aspects of the environmental characteristics of areas likely to be significantly affected. In compliance with this requirement the SEA will focus upon the most relevant aspects of the environmental characteristics. The SEOs are linked to indicators which can facilitate monitoring the environmental effects of the draft Implementation Plan as well identifying targets which the draft Plan can help work towards.</p> <p>21. For the attention of DAFM. This comment relates to the IFSIP more than the Objectives, Targets and Indicators outlined in the SEA ER. Strategic Environmental Objectives (SEOs) are methodological measures against which the environmental effects of the draft Plan can be assessed. The SEA Directive requires that the evaluation of the draft Implementation Plan be focused upon the relevant aspects of the environmental characteristics of areas likely to be significantly affected. In compliance with this requirement the SEA will focus upon the most relevant aspects of the environmental characteristics. The SEOs are linked to indicators which can facilitate monitoring the environmental effects of the draft Implementation Plan as</p>
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<p>sometimes “widely spaced” may not be as useful as provision of open areas that are required particularly for some wetland habitats. In these circumstances, what percentage of open space/unplanted area will be Allowed?</p> <p>28. p76 Table 8 2 Environmental Assessment of Forestry Programme - Intervention and Measures: Intervention 8-Reconstitution - Measure 1: There needs to be an acceptance that plantations that failed, should in some cases be removed completely not just replanted with diff species. This could be stated in the SEA comments section - Measure 2 Underplanting Ash Dieback- If underplanting with different species; these should be native broadleaf species. The conclusion of the SEA of a positive effect on biodiversity is entirely based on this factor but there is absence of a clear commitment that native species will be used</p> <p>29. p79 Table 8 3 SEA of Actions within the Forestry Action Plan - 6th point- SEA Comments: “Identify “Go To” Areas”- This is a new and welcome idea, particularly for promoting native woodlands. Following a robust environmental assessment, this Action could also be a good way to target spruce away from sensitive areas</p> <p>30. p82 Table 8 3 SEA of Actions within the Forestry Action Plan Goal-Incentives for forest creation and management - “Action 16: Implement support schemes to support redesign and, where appropriate, restoration measures at reforestation stage.” This is very welcome but it should also support such action before the reforestation stage, if appropriate, or at least have a mechanism to facilitate and allow this</p> <p>31. p88 Table 8 3 SEA of Actions within the Forestry Action Plan - Action 42: “Implement support schemes for the reconstitution of forests following significant damage by natural causes” It is important for environmental reasons that some damaged areas should not be replanted, but damaged trees may require to be removed e.g. wind throw on river banks in some SACs</p> <p>32. p94 Table 8 3 SEA of Actions within the Forestry Action Plan - “Action 64: Support the establishment and natural regeneration of native forest on post-industrial cutaway peatlands, where appropriate” As stated previously, not all peatland sites are suitable for this Action. It requires a robust assessment by a qualified ecologist to assist in implementing this Action</p> <p>33. p95 Table 8 3 SEA of Actions within the Forestry Action Plan - “SEA Comments”: We welcome the clarification that “Only peatlands that do not have the capacity to be restored and cannot be used as a carbon sink, will be considered for replanting of native trees” This Action also needs to consider other valuable habitats especially for birds and Annex II species e.g. Marsh fritillary which occurs frequently on such sites</p> <p>34. p96 Table 8 2 Environmental Assessment of Forestry Programme - Intervention and Measures - “Action 67: Support the appropriate restoration and conservation of Ancient and Long-established Woodland through funding restoration works” and “Action 68: Establish a baseline and complete the national inventory of Ancient and Longestablished Woodland” These are very welcome actions but could go further by adding such areas to the “Go To” list referred to earlier, to incentivise further. Refer to earlier comments on the need to address former areas of historical woodland on undeveloped sites</p> <p>35. p108 Table 9 1 Mitigation Measures - 9th point: A very welcome commitment that Afforestation will be restricted to native tree species in the Top 8 Freshwater Pearl Mussel Catchments. However, it should be acknowledged that other areas where this species occurs also require safeguards to prevent adverse effects of inappropriate actions that might result from implementation of this Plan</p> <p>36. As a general point, some of the statements made throughout the NIS and SEA require revision to include a more robust understanding of the breadth of ecological requirements/needs and impacts of existing pressures from</p>	<p><i>well identifying targets which the draft Plan can help work towards.</i></p> <p>22. <i>SEA Environmental Report has been updated to reference this suggestion, as appropriate.</i></p> <p>23. <i>For the attention of DAFM. This comment relates to the IFSIP more than the Objectives, Targets and Indicators outlined in the SEA ER. Strategic Environmental Objectives (SEOs) are methodological measures against which the environmental effects of the draft Plan can be assessed. The SEA Directive requires that the evaluation of the draft Implementation Plan be focused upon the relevant aspects of the environmental characteristics of areas likely to be significantly affected. In compliance with this requirement the SEA will focus upon the most relevant aspects of the environmental characteristics. The SEOs are linked to indicators which can facilitate monitoring the environmental effects of the draft Implementation Plan as well identifying targets which the draft Plan can help work towards.</i></p> <p>24. <i>Table 8.2 in the SEA Environmental Report has been updated to reference this suggestion.</i></p> <p>25. <i>SEA Environmental Report has been updated to reference this suggestion, as appropriate. However, the second point of this comment, relates to the Actions, Measures, and Interventions of the IFSIP more than the environmental assessment of such. Thus, is for the attention of DAFM.</i></p> <p>26. <i>For the attention of DAFM, this comment relates to the Actions, Measures, and Interventions of the IFSIP more than the environmental assessment of such.</i></p> <p>27. <i>SEA Environmental Report has been updated to reference this suggestion, as appropriate.</i></p> <p>28. <i>For the attention of DAFM, this comment relates to the Actions, Measures, and Interventions of the IFSIP more than the environmental assessment of such.</i></p> <p>29. <i>Noted. SEA Environmental Report has been updated to reference this suggestion, as appropriate.</i></p> <p>30. <i>This comment is welcomed, for the attention of DAFM.</i></p> <p>31. <i>For the attention of DAFM, this comment relates to the Actions, Measures, and Interventions of the IFSIP more than the environmental assessment of such.</i></p> <p>32. <i>Noted. For the attention of DAFM, it is suggested that the Department update the wording of Action 42 to reflect this comment, as appropriate.</i></p> <p>33. <i>SEA Environmental Report has been updated to reference this suggestion.</i></p>
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numerous sectors (including forestry) on birds in the wider countryside, but in particular for those species that collectively are associated with and dependent upon open peatland and grassland habitats. While acknowledging legacy issues of the past, the current Implementation Plan does not set out a clear strategy/framework as to how those past mistakes will not be repeated, particularly given Ireland's obligations under the Birds Directive (including those under Article 4(4)).

34. *Noted. SEA Environmental Report has been updated to reference this suggestion, as appropriate. However, the comments made in this submission should also be considered for the attention of DAFM.*
35. *For the attention of DAFM, this comment relates to the Actions, Measures, and Interventions of the IFSIP more than the environmental assessment of such.*
36. *Refer to the Environmental Safeguards Chapter of the IFSIP for further information.*
37. *The SEA ER, NIR and IFSIP have all been updated on the back of the consultation period where the areas detailed have been incorporated into all documents. In particular, refer to the Environmental Safeguards Chapter of the IFSIP for further information. The Environmental Chapter details:*
 - *Legacy issues;*
 - *Application processes and requirements in relation to regulated forest activities;*
 - *Forestry inspection processes;*
 - *iFORIS, iNET and QGIS systems;*
 - *Statutory referrals;*
 - *Public consultation;*
 - *Referral to ecology, the DAFM Archaeology Team and Engineering;*
 - *The Appropriate Assessment Procedure;*
 - *Assessment to Determine EIA Requirement;*
 - *Licensing conditions;*
 - *Requirements;*
 - *Mandatory guidelines' and other procedures;*
 - *Sanctions;*
 - *Register of Foresters and Forestry Companies;*
 - *Directory of Private Ecologists available for Forestry Projects;*
 - *Training for Registered Foresters and Consultant Ecologists;*
 - *Supporting technologies;*
 - *Environmental Receptors;*
 - *HNV Farmland, Hen Harrier, Breeding Curlew, Merlin, Freshwater Pearl Mussel;*
 - *Afforestation and Annex 1 habitats;*
 - *Afforestation and peat soils;*
 - *Afforestation and Article 17;*
 - *Felling and Reforestation Policy;*
 - *Fire Prevention and Control;*
 - *Forest health;*

	<ul style="list-style-type: none"> - Forest Reproductive Material (FRM); - Ireland's National Forest Inventory (NFI); and - Research relevant to forestry and the environment.
<p>1. Measure 2 The Woodland Environment Fund (WEF) applications for WEF require an Environmental Report to outline the environmental/ecological features of the site that the WEF is supporting/enhancing. I would like to know if this Environmental Report 1 is actually supplied with applications for WEF and if so? is it assessed by the Forest Service and by whom? It is an opportunity to document the ecological features (habitats or species) of the site that the WEF will support. Then, potentially report on the biodiversity/ecosystem service outcome/success for the provider of the funding. There may be Good potential promotion opportunities for the Funder and the Forest Service from the Environmental Report and reporting on the outcomes</p> <p>2. Reliance on outdated environmental guidelines-The new programme proposes that it will adhere to the existing forestry guidelines. This is somehow the basis for the favourable conclusions in the SEA and AA. However, the scientific basis for these guidelines is unclear and, in some cases severely questionable (e.g. the concept that pollution becomes insignificant after 6 km in the FPM Guidelines). How can the forestry guidelines that have been used for over 20 years, and are not evidently based on scientific references, solve the issues that Irish forestry has been documented to have caused within those 20 years? How is this not doing the same thing and expecting different results?</p>	<p><i>Refer to new Chapter of IFSIP 'Environmental Safeguards' which provides an overview of the various environmental safeguards applied by DAFM as it executes its role regulating the Irish forestry sector and as it implements the Forestry Programme 2023-2027. It focuses on the safeguards in place during the licensing process relating to afforestation, forest road construction, tree felling (including reforestation) and the aerial fertilisation of forests, and related grant schemes. In this, the application process is examined, alongside the various components supporting it, including policies, procedures and protocols surrounding various environmental receptors. This chapter also includes other areas and activities DAFM is responsible for regulating or implementing and which are relevant to the protection of the environment, such as forest protection from pests and diseases, forest reproductive material, the National Forest Inventory, and forest research.</i></p>
<p>As outlined in our screening response for the strategy dated 15/09/2022, HED welcomes the aims and objectives of the strategy and implementation plan in principle but reiterates that the potential for transboundary effects on cultural heritage, needs to be adequately taken into account in the SEA environmental report. Many heritage assets are located near the border area and some, such as historic landscapes and routeways traverse it. Afforestation projects, both large scale new forests with associated infrastructure and smaller agricultural planting schemes, as outlined by the measures under interventions 1 & 2, have the potential to change the landscape character and the setting of heritage assets and how they are seen, enjoyed, and understood. Direct impacts on historic routeways, tree plantings, field boundaries and patterns can also affect the narrative of historic landscape character, which reveals how our ancestors were influenced by and shaped the distinctive character of a place over time. HED considers that the potential for effects on the setting of heritage assets and historic landscape character have been sufficiently captured in the draft cultural heritage targets, (Table 6.1), and mitigation measures (Table 9.1), but should also be assessed in the context of the potential for transboundary effects on cultural heritage.</p> <p>To aid this assessment, we include links to our Historic Environment datasets, which include recorded designated and non-designated heritage assets, available</p>	<p><i>The SEA Environmental Report has been updated to provide greater clarity surrounding potential transboundary effects.</i></p>
<p>1. General Comments: The EPA's key observation with respect to the SEA ER is the apparent lack of integration of the findings of the assessment into the IFSIP itself. The SEA ER does not provide clarity on how the process was undertaken in conjunction with the development of the IFSIP. We note that a Natura Impact Statement has been prepared in support of the IFSIP, which includes mitigation measures. It would be useful for the SEA ER to include any recommendations and mitigation measures from the Natura Impact Statement and discuss how these will be incorporated into the IFSIP. As a general comment, the index for page numbers has not been updated and is not reflective of the position of the various discussion topics within the document. This should be updated in the interests of clarity prior to finalising the documents.</p> <p>2. Consultation: The intention to undertake non-statutory consultation with the environmental authorities in Northern Ireland for the draft plan and SEA ER was referred to during the SEA scoping stage. A reference to this consultation and its outcome should be included in the SEA ER as relevant. The relevant requirements of the SEA protocol under the ESPOO Convention should be taken into account, for any transboundary consultations with non-EU Member States.</p>	<ol style="list-style-type: none"> 1. <i>The SEA Statement will describe in detail how the SEA process was undertaken in conjunction with the development of the IFSIP. The SEA Environmental Report has been updated to include recommendations and mitigation measures from the NIR. The index of page numbers has been updated.</i> 2. <i>In accordance with the EPA Guidance, "where the Plan or Programme (or modification) may significantly affect the environment in Northern Ireland, you should contact the Department of Agriculture, Environment and Rural Affairs at the following address: SEATeam@daera-ni.gov.uk." No Scoping Response was received from the Department, hence why it is not detailed in the SEA ER. The SEA Statement will</i>

<p>3. Alignment with Plans & Programmes: DAFM should ensure that the IFSIP aligns with key relevant higher-level plans and programmes and is consistent with the relevant objectives and policy commitments. This includes the Common Agricultural Policy Strategic Plan 2023-2027 and its guiding European legislation; the Climate Action Plan 2022 (and the upcoming Climate Action Plan 2023) and the relevant aspects of the draft River Basin Management Plan 2022-2027. We welcome the inclusion in the SEA ER of the schematic illustrating the national & European policies and plans with which the IFSIP is linked. It would be useful to include a similar schematic within the IFSIP itself. This would help to identify areas where there are interlinkages and dependencies to ensure full implementation of the various policies and legislation. Clarity should also be provided on how Coillte's policies/strategies for management of forests and forestry activities relate to the IFSIP. It would be useful to include some discussion in the SEA ER relating to the UN Sustainable Development Goals (SDGs), in particular SDGs 13 (Climate Action) and 15 (Life on Land), reflecting the SDG principle that land be appropriately managed to achieve social, economic and environmental objectives.</p> <p>4. Likely evolution of the current state of the environment Annex I(b) of the SEA Directive requires that the SEA ER provide information relating to the relevant aspects of the current state of the environment and its likely evolution without implementation of the plan or programme. The SEA ER should include a description of the likely evolution of the current state of the environment without the implementation of the plan. This is an important element to include, as the environmental baseline at the end of the plan period may be quite UNECE Protocol on Strategic Environmental Assessment to the Convention on Environmental Impact Assessment in a Transboundary Context different from the baseline at the beginning. It would also give an indication of likely cumulative impacts affecting the plan over its lifetime. For example, in the case of the IFSIP this analysis could look at the increase/decrease of afforestation rates without the plan, floods and droughts affecting tree/forest health, etc.</p> <p>5. Existing environmental problems: The SEA ER should more clearly and thoroughly address existing environmental problems. The SEA ER makes reference to some existing environmental problems, such as the fact most of Ireland's forest cover is monoculture conifers, issues with dieback and excessive levels of nutrients entering water courses. The discussion on these environmental problems should highlight which issues are the most significant in terms of affecting the IFSIP. It would be useful for the SEA ER to include a section that summarises the environmental problems associated with the environmental topics in this regard. Trends for key environmental receptors and the environmental baseline. The SEA ER references past environmental trends. Our scoping submission noted several opportunities where the SEA ER could examine trends e.g. greenhouse gas emission projections, areas for potential land use change over the lifetime of the plan, etc. It would be useful for the SEA ER to have carried out an assessment of likely future trends. This would help to inform the plan development, ensuring that proposed actions and measures would be sufficient to meet the various environmental targets and objectives. The 4th National Biodiversity Action Plan is being finalised by the National Parks and Wildlife Service at present. Reference to any actions included in the draft plan that relate to forestry activities should be included in the environmental baseline for the SEA ER. In addition to the CORINE data used to identify land use, land use change and forestry, the OSi will shortly be launching detailed high resolution landcover maps. These maps, developed in partnership with EPA, will help to identify landcover categories at a much greater resolution to that shown in CORINE. These maps will be an important resource for future forest management and forward planning, during the lifetime of this plan.</p> <p>6. Cumulative effects and sensitivity mapping -Our submission at the scoping stage noted that the Environmental Sensitivity Mapping (ESM) webtool (www.enviromap.ie) could help to support other environmental assessment findings. Tools such as the ESM Webtool would assist in identifying areas of particular environmental sensitivity during planning for new forest developments at a county, regional or national level. This would ensure particular sensitivities are recognised early on and the appropriate measures established and implemented. Identifying environmentally sensitive areas early also helps avoid significant cumulative effects across multiple sectors in the course of forward planning activities. The SEA ER includes a very useful map of environmental sensitivity (Page 187). However, it is not clear how this map was used to inform the development of the IFSIP. The SEA ER refers to</p>	<p><i>describe in detail the consultation undertaken as part of the SEA process, the submissions received and how they were responded to.</i></p> <p>3. <i>For attention of DAFM. The SEA Environmental Report has been updated to include reference to the SDGs</i></p> <p>4. <i>The SEA Environmental Report has been updated to include a section on the likely evolution of the current state of the environment.</i></p> <p>5. <i>The SEA Environmental Report has been updated to enhance the description of environmental problems to highlight which issues are the most significant in terms of affecting the IFSIP. This includes greater discussion of future environmental trends, as well as actions from the 4th National Biodiversity Action Plan.</i></p> <p>15. <i>Refer to new Chapter of IFSIP 'Environmental Safeguards' which provides an overview of the various environmental safeguards applied by DAFM as it executes its role regulating the Irish forestry sector and as it implements the Forestry Programme 2023-2027. It focuses on the safeguards in place during the licensing process relating to afforestation, forest road construction, tree felling (including reforestation) and the aerial fertilisation of forests, and related grant schemes. In this, the application process is examined, alongside the various components supporting it, including policies, procedures and protocols surrounding various environmental receptors. This chapter also includes other areas and activities DAFM is responsible for regulating or implementing and which are relevant to the protection of the environment, such as forest protection from pests and diseases, forest reproductive material, the National Forest Inventory, and forest research.</i></p> <p>6. <i>The SEA Environmental Report has been updated to provide greater description of the alternatives considered</i></p> <p>7. <i>The SEA Environmental Report has been updated to provide greater clarity around the mitigation measures and how they relate to likely significant effects. The SEA Environmental Report has been updated to include a summary of the mitigation measures set out in the NIR. To discuss with DAFM re checklist for applicants</i></p> <p>8. <i>The Monitoring table has been updated to focus on the likely residual effects of the IFSIP</i></p> <p>16. <i>Refer to new Chapter of IFSIP 'Environmental Safeguards' which provides an overview of the various environmental safeguards applied by DAFM as it executes its role regulating the Irish forestry sector and as it implements the Forestry</i></p>
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<p>‘environmental sensitivities’ but not in the context of the map presented in the report. The IFSIP would benefit from incorporating a spatial element, taking into consideration the sensitivity map. It is important that the IFSIP focusses on preventing negative impacts from forestry, particularly in highly sensitive areas. The plan should ensure that the principle of ‘the right tree in the right place’ be informed through spatial analysis and the use of sensitivity maps. The competing land needs of forestry and renewable energy, in line with the national targets for both sectors in the IFSIP and the upcoming Renewable Electricity Spatial Policy Framework, should also be considered in terms of the cumulative impacts on land use and land cover for the country.</p> <p>7. Alternatives: The SEA Environmental Report includes an assessment of alternatives. The alternatives presented are:</p> <ul style="list-style-type: none"> – Do nothing (do not launch a new Forestry Programme); – Continue with the current Forestry Programme 2014-2020; and, – Prepare a new implementation plan with Forest Action Plan and Forestry Programmes of <p>In line with the recommendations in the EPA’s guidance document Development and Assessing Alternatives in Strategic Environmental Assessment the alternatives presented in the SEA ER should reflect the decisions taken during the development of the plan and should be developed through close collaboration between the planning and SEA teams. The plan-making and SEA processes should be clearly interlinked. The alternatives assessed should be realistic, reasonable, viable and implementable.</p> <p>The alternatives presented in the SEA ER could be enhanced by considering different levels of ambition for achieving or surpassing environmental targets (e.g. a range of afforestation rates, different forest types beyond the 12 considered) and considering delivery of all elements of the IFSIP equally, or on a phased or priority basis. These may be more informative alternatives to consider in order to help deliver on the various actions outlined in the IFSIP. It may also have been useful to have referred to the alternatives considered under the environmental assessment of the previous forestry programme and how they differ to those considered under the present iteration.</p> <p>8. Mitigation Measures: The SEA ER provides an extensive list of mitigation measures in Table 9.1 Mitigation Measures. There are also further additional mitigation measures listed in Appendix C of the SEA ER, relating to measures already incorporated in various DAFM documents. However, the mitigation measures listed are measures already incorporated in various DAFM guidelines, standards documents and policies. It is unclear how the two sets of mitigation measures relate to each other. Furthermore, the mitigation measures apply to forestry activities rather than the IFSIP itself. The mitigation measures do not clearly relate to the likely significant impacts of implementation of the plan, as is required by the SEA Directive. The challenge will be to ensure that the mitigation measures proposed will successfully mitigate the identified impacts of the IFSIP. It is not clear if the mitigation measures currently proposed will meet this challenge, in particular any cumulative or in combination impacts of the implementation of the IFSIP. There is merit in preparing a checklist for applicants for afforestation licences/permits and for Registered Foresters, incorporating the relevant mitigation measures from the SEA ER. The IFSIP should state that applicants will need to complete the checklist as part of the authorisation approval process.</p> <p>9. Monitoring: Table 9.2.1 of the SEA ER sets out the proposed monitoring measures for the IFSIP. This includes information on the frequency and responsibility for monitoring those particular aspects and the various sources and suggested indicators for the relevant environmental criteria. The proposed SEA monitoring framework does not focus on the main predicted significant impacts of the plan. It includes an extensive list of indicators, but these relate to general environmental trends rather than the specific impacts of the IFSIP. The IFSIP acknowledges the importance of forests to our health and wellbeing in terms of access to nature and the human interaction with forested areas. The SEA ER notes the potential for significant effects in this regard. These could be taken into account in the SEA Monitoring programme. The Monitoring Programme should be flexible to take account of specific environmental issues and unforeseen adverse impacts should they arise during implementation. It should consider and deal with the possibility of cumulative effects. Monitoring of both positive and negative effects should be considered. The monitoring programme should set out the various data sources, monitoring frequencies, responsibilities and reporting. If the</p>	<p><i>Programme 2023-2027. It focuses on the safeguards in place during the licensing process relating to afforestation, forest road construction, tree felling (including reforestation) and the aerial fertilisation of forests, and related grant schemes. In this, the application process is examined, alongside the various components supporting it, including policies, procedures and protocols surrounding various environmental receptors. This chapter also includes other areas and activities DAFM is responsible for regulating or implementing and which are relevant to the protection of the environment, such as forest protection from pests and diseases, forest reproductive material, the National Forest Inventory, and forest research.</i></p> <p>9. <i>Noted</i></p> <p>10. <i>Noted</i></p> <p>11. <i>Noted</i></p>
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<p>monitoring identifies adverse impacts during the implementation of the IFSIP, DAFM should ensure that suitable and effective remedial action is taken in a timely fashion</p> <p>10. Integration of SEA into the IFSIP The mitigation measures and recommendations from the SEA Environmental Report should be incorporated into the IFSIP The IFSIP would benefit from the inclusion of a section or chapter related to “Environmental Assessment” showing how the assessment process and the SEA recommendations have been integrated into the IFSIP In particular, the IFSIP should include clear commitments to implement the recommendations and mitigation measures identified in the SEA ER Similarly, the IFSIP should include an additional table related to how the findings and recommendations of the Appropriate Assessment have been reflected in the final plan</p> <p>11. Future Amendments to the IFSIP Any future amendments to the IFSIP should be screened for likely significant effects, using the same method of assessment applied in the “environmental assessment” of the IFSIP</p> <p>12. SEA Statement – “Information on the Decision” Once the IFSIP is adopted, an SEA Statement should be prepared that summarises:</p> <ul style="list-style-type: none"> • How environmental considerations have been integrated into the IFSIP; • How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the IFSIP; • The reasons for choosing the IFSIP adopted in the light of other reasonable alternatives dealt with; and, • The measures decided upon to monitor the significant environmental effects of implementation of the IFSIP A copy of the SEA Statement with the above information should be sent to any environmental authority consulted during the SEA process Guidance on preparing SEA Statements is available on the EPA website at the following link: https://www.epa.ie/publications/research/environmental-technologies/research-306-guidance.php <p>13. Environmental Authorities: In accordance with the SEA Regulations the following authorities should be consulted with:</p> <ul style="list-style-type: none"> • Environmental Protection Agency; • Minister for Housing, Local Government and Heritage; • Minister for Environment, Climate and Communications; and • Minister for Agriculture, Food and the Marine 	
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