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29<sup>th</sup> November 2022

**Re: Consultation on the SEA Environmental Report and AA Natura Impact Report for the draft Forest Strategy Implementation Plan**

Dear Ms Farrell

Thank you for the opportunity to make comments to the Consultation on the SEA Environmental Report and AA Natura Impact Report for the draft Forest Strategy Implementation Plan. The consultation body comprising of Department of Agriculture, Environment and Rural Affairs (DAERA) and supported by a service level agreement with the Department for Communities – Historic Environment Division (HED) has considered the documents with our opinions detailed below, and in the separate document from HED.

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.

**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 23<sup>rd</sup> 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 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.

It may be worth including in your considerations the following:

- The Wildlife (NI) Order 1985 (as amended)
- Wildlife and Natural Environment Act (NI) 2011
- The Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 (as amended)
- The Environment (NI) Order 2002
- The Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2017
- The Strategic Planning Policy Statement (SPPS) for Northern Ireland
- Planning Policy Statements (PPS – in particular PPS2 and PPS18). It should be noted that the PPS's will be superseded by Local Development Plans when they are adopted.
- Biodiversity Strategy for NI to 2020 <https://www.daera-ni.gov.uk/publications/biodiversity-strategy-northern-ireland-2020-0>



- Draft Environment Strategy <https://www.daera-ni.gov.uk/consultations/esni-public-discussion-document>
- The Draft NI peatland policy: <https://www.daera-ni.gov.uk/consultations/ni-peatland-strategy-consultation>.
- The Draft Green Growth Strategy [Consultation on the draft Green Growth Strategy for Northern Ireland | Department of Agriculture, Environment and Rural Affairs \(daera-ni.gov.uk\)](https://www.daera-ni.gov.uk/consultations/green-growth-strategy)

DAERA have a map browser for NI protected sites and known priority habitat:  
[www.daera-ni.gov.uk/services/natural-environment-map-viewer](http://www.daera-ni.gov.uk/services/natural-environment-map-viewer)

A number of useful information sources that highlight the current state of the environment in Northern Ireland at a regional level and which could be referenced are:

- Northern Ireland State of the Environment Reports: <https://www.daera-ni.gov.uk/publications/state-environment-report-2013>
- Northern Ireland Environmental Statistics Reports: <https://www.daera-ni.gov.uk/articles/northern-ireland-environmental-statistics-report>

Other relevant web-links are;

- Designated Scientific Sites: [www.daera-ni.gov.uk/landing-pages/protected-areas](http://www.daera-ni.gov.uk/landing-pages/protected-areas)
- Regional Landscape Character Map viewer: <https://www.daera-ni.gov.uk/services/regional-landscape-character-areas-map-viewer>

DAERA have a map browser for NI protected sites and known priority habitat:  
[www.daera-ni.gov.uk/services/natural-environment-map-viewer](http://www.daera-ni.gov.uk/services/natural-environment-map-viewer)

Our natural environment datasets are available at the link below:  
[www.daera-ni.gov.uk/articles/download-digital-datasets](http://www.daera-ni.gov.uk/articles/download-digital-datasets)

Appropriate Assessments should refer to the status of habitats and species in the relevant reports available on the JNCC website as follows: UK Article 17 report for the Habitats Directive

<https://jncc.gov.uk/our-work/article-17-habitats-directive-report-2019/>

and the UK Article 12 report for the Birds Directive

<https://jncc.gov.uk/our-work/european-reporting/#birds-directive-reporting>



NED is content that the NIS has considered transboundary issues by including any SAC or SPA within 15km of the border with Northern Ireland as part of the analysis including mitigation measures.

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 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.

### **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.daera-ni.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 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.daera-ni.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 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 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.

### **Drinking Water Inspectorate Comments**

Thank you for consulting with DWI on the Environment Report & Natura Impact Report for the SEA of the draft Forest Strategy Implementation Plan (FSIP). 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. 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.



## **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/land-and-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>)

## **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 AQBUs 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.

### **Marine Plan Team Comments**

#### *Marine Conservation Advice response*

Marine Conservation Advice (MCA) welcomes the opportunity to comment on this Environment Report & Natura Impact Report for the SEA of the draft Forest Strategy Implementation Plan (FSIP); comments are listed in order that they appear in the report for ease of following and understanding.

### **The draft Forest Strategy Implementation Plan**

In **Table 1 – European Sites in Ireland and Northern Ireland**, MCA advises the following edit: Regarding SPAs there are currently 17 that need to be considered due to the inclusion of the East Coast Marine pSPA.

In **Table 7 – In-combination effects with other plans or projects**, MCA recommends considering the following plans, policies and legislation where the Forest Strategy is to be implemented in close proximity to Carlingford Lough and Lough Foyle:

#### **The Marine and Coastal Access Act 2009**

*The Marine and Coastal Access Act 2009 introduced a revised system of Marine Management and Licensing, including marine planning. The eight key elements are:*

- *Establishment of the Marine Management Organisation (MMO)*
- *Creation of a strategic marine planning system*
- *A streamlined marine licensing system*
- *Marine nature conservation*
- *Fisheries management and marine enforcement*
- *Migratory and freshwater fisheries*
- *Coastal access*
- *Coastal and estuarine management*

#### *[The Marine and Coastal Act 2009](#)*



## The Marine Strategy Regulations 2010

*The UK Marine Strategy Regulations 2010 require the UK to take the necessary measures to achieve or maintain Good Environmental Status (GES) through the development of a UK Marine Strategy. The UK Marine Strategy, made up of Parts One, Two and Three, sets out a comprehensive framework for assessing, monitoring and taking action across our seas to achieve the UK's shared vision for 'clean, healthy, safe, productive and biologically diverse ocean and seas'. In October 2019, the updated UK Marine Strategy Part One: UK updated assessment and Good Environmental Status was published. In March 2021 the updated UK Marine Strategy Part Two: UK updated monitoring programmes was published and the UK Marine Strategy Part 3: Programme for Measures is being reviewed after being out for consultation (6/09/21-29/11/21).*

[UK Marine Strategy Part 1](#)

[UK Marine Strategy Part 2](#)

[Overview of UK Marine Strategy Part 3](#)

## Marine Policy Statement 2011

*This Marine Policy Statement (MPS) is the framework for preparing Marine Plans and taking decisions affecting the marine environment. It will contribute to the achievement of sustainable development in the United Kingdom marine area. It has been prepared and adopted for the purposes of section 44 of the Marine and Coastal Access Act 2009. The MPS will facilitate and support the formulation of Marine Plans, ensuring that marine resources are used in a sustainable way in line with the high level marine objectives and thereby:*

- *Promote sustainable economic development;*
- *Enable the UK's move towards a low-carbon economy, in order to mitigate the causes of climate change and ocean acidification and adapt to their effects;*
- *Ensure a sustainable marine environment which promotes healthy, functioning marine ecosystems and protects marine habitats, species and our heritage assets; and*
- *Contribute to the societal benefits of the marine area, including the sustainable use of marine resources to address local social and economic issues.*

[Marine Policy Statement](#)

## The draft Marine Plan for Northern Ireland (consultation 2018)

*A marine plan becomes a consideration in all relevant planning decisions once it is published for public consultation. The **NI Marine Plan** was published for public consultation on 18 April 2018. The Plan must be used for all planning decisions for the sea, coast, estuaries and tidal waters, as well as developments that impact, or might*



*impact, these areas, such as infrastructure. **All public authorities are responsible for implementing the Plan through existing regulatory and decision-making processes.** As well as public authorities, all applicants, third parties and advisors should also consider the Plan. Proposals should conform with all relevant policies, taking account of economic, environmental and social considerations.*

### **Wildlife (Northern Ireland) Order 1985**

*Attention is drawn to Article 10 of the Wildlife (Northern Ireland) Order 1985 (as amended) under which it is an offence to intentionally or recklessly disturb, capture, injure a Common seal (*Phoca vitulina*), Grey seal (*Halichoerus grypus*) or Basking shark (*Cetorhinus maximus*). In addition it is an offence to intentionally or recklessly, injure or kill a wild animal included in Schedule 5 of this Order. This includes Angel shark (*Squatina squatina*), Common skate (*Dipturus batis*), Short snouted seahorse (*Hippocampus hippocampus*), Spiny seahorse (*Hippocampus guttulatus*), Spiny lobster (*Palinurus elaphus*) and Fan mussel (*Atrina fragilis*).*

*It is also an offence to intentionally or recklessly;*

- *disturb any such animal while it is occupying a structure or place which it uses for shelter or protection,*
- *damage or destroy, or obstruct access to, any structure or place which any such animal uses for shelter or protection,*
- *damages or destroys anything which conceals or protects any such structure; or*
- *to have in possession or control any live or dead wild animal included in Schedule 5 or any part of, or anything derived from, such an animal.*

### [The Wildlife \(Northern Ireland\) Order 1985](#)

### **Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995**

*Attention is drawn to regulation 34 of The Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 (as amended), which states that it is an offence to deliberately disturb, capture, injure or kill a wild animal of a European Protected Species included in Schedule 2 to these Regulations. This includes all species of dolphins, porpoises and whales and the marine turtle species.*

*It is also an offence to;*

- deliberately obstruct access to a breeding site or resting place of such an animal,*
- damage or destroy a breeding site or resting place of such an animal,*
- keep, transport, sell or exchange, or offer for sale or exchange, any live or dead wild animal of a European protected species, or any part of, or anything derived from, such an animal.*



### **Marine Act (Northern Ireland) 2013**

*The Marine Act (Northern Ireland) 2013 requires DAERA to establish a network of MPAs in the Northern Ireland inshore region that, together with MPAs designated by the other UK administrations, contributes to the conservation and improvement of the marine environment in the UK marine area.*

[Marine Act \(Northern Ireland\) 2013](#)

### **Strategic Planning Policy Statement for Northern Ireland 2015**

[Strategic Planning Policy Statement](#)

### **An Integrated Coastal Zone Management Strategy for Northern Ireland 2006-2026**

*This strategy is intended to set out long-term objectives for achieving sustainable coastal management, through improvements to existing management systems, the development of new management systems and identifying and dealing with potential areas of conflict. The strategy is based around 4 broad themes, consistent with the principles of sustainable development. Most relevant to this work is Priority 2: Safeguarding and improving the environment within the coastal zone and Priority 4: integration of planning and effort. Each theme has a set of aims for delivery.*

### **Northern Ireland Regional Seascape Character Assessment 2014**

*The aim of this study is to provide a strategic understanding of different areas of regional seascape character along the entire Northern Ireland coast, complementing similar assessments undertaken elsewhere in the UK. This will contribute to the aims of the European Landscape Convention through promoting the protection, management and planning of the seascape, and to support European cooperation on landscape issues.*

[Northern Ireland Regional Seascape Character Assessment](#)

### **Marine Litter**

Marine litter is defined as items arising from human activity, deliberately discarded or unintentionally lost, that end up in the sea and on beaches and coastlines. Marine litter is any persistent, manufactured or processed solid material discarded, disposed of or abandoned in the marine and coastal environment. Marine litter can cause significant impacts to marine ecosystems, including direct damage to wildlife through entanglement, entrapment and/ or ingestion and can also destroy coastal habitats, by interfering with biological production and smothering of the seabed.

#### Policy Requirement – Marine litter considerations

The Marine Strategy Regulations 2010, as amended, impose a general duty on government departments to take measures to achieve good environmental status in marine waters. They also place a duty on public authorities to have regard to the UK Marine Strategy which has been developed in accordance with the Regulations when



exercising their functions. The objective of the UK Marine Strategy is to achieve good environmental status in marine waters. In respect of marine litter, this is ensuring that the properties and quantities of marine litter do not cause harm to the coastal and marine environments.

#### Draft Marine Plan for Northern Ireland

The Marine Plan for Northern Ireland will inform and guide the regulation, management, use and protection of our marine area. DAERA consulted on the Draft Marine Plan for Northern Ireland in 2018 and work is on-going to further develop it.

The draft Marine Plan for Northern Ireland provides a framework of policies to be considered by public authorities taking decisions which affect or might affect the marine area through decision making processes. It is a material consideration in this regard.

Public authorities must consider the potential risk of litter entering the marine area as a result of proposals. Where a proposal creates the potential for litter to enter the marine area, a public authority may require the proposer to demonstrate:

- a) how the risk has been considered; and
- b) appropriate measures to minimise the risk.

Information on how this is to be achieved is set out in paragraphs 187 to 199 of the Draft Marine Plan for Northern Ireland

(<http://www.daerani.gov.uk/sites/default/files/consultations/daera/Marine%20Plan%20for%20NI%20final%2016%2004%2018.PDF>)

#### Strategic Environmental Assessment Environmental Report for Ireland's draft Forest Strategy Implementation Plan

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:

- 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



[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.

The Natura Impact Report prepared as part of the Appropriate Assessment Process

In **Table 1 – European Sites in Ireland and Northern Ireland.** MCA advises the following edit: Regarding SPAs there are currently 17 that need to be considered due to the inclusion of the East Coast Marine pSPA.

In **Table 7 – In-combination effects with other plans or projects,** 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.

Further advice can be sought from the Marine Conservation Advice Team, DAERA Marine and Fisheries Division, Klondyke Building, Cromac Avenue, Belfast, BT7 2JA. Tel: 028 90 569 532 or email: [Marine.Wildlife@daera-ni.gov.uk](mailto:Marine.Wildlife@daera-ni.gov.uk)

**Inland Fisheries Response**

DAERA Inland Fisheries response to - Consultation on the Environment Report & Natura Impact Report for the SEA of the draft Forest Strategy Implementation Plan (FSIP)

DAERA Inland Fisheries, is a core branch within Marine and Fisheries Division of the Department of Agriculture Environment and Rural Affairs. It has a statutory remit for the conservation, protection, development and improvement of salmon and inland fisheries under the Fisheries Act (NI) 1966 (as amended). DAERA Inland Fisheries is the implementing authority under the Convention for the Conservation of Salmon in the North Atlantic. This treaty requires signatory states to develop programmes of work to conserve, rationally manage and improve Atlantic salmon populations and their habitats within their jurisdiction. This work is scrutinised by the North Atlantic Salmon Conservation Organisation (NASCO).



Inland Fisheries welcomes the opportunity to comment on the Consultation on the Environment Report & Natura Impact Report for the SEA of the draft Forest Strategy Implementation Plan (FSIP)

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.

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.

- 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.

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 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.

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.

### **Marine Plan Team Comments**

The Marine Plan Team (MPT) DAERA – Marine and Fisheries Division welcome the opportunity to comment on the SEA Environmental Report for Ireland’s draft Forest Strategy Implementation Plan (FSIP).

The MPT have no comments to make on the accompanying Natura Impact Report. The MPT understands Ireland’s draft FSIP provides details on the implementation means of achieving the overarching strategy objectives contained in Ireland’s Forest Strategy 2030. This will meet the immediate to short term needs for the period of 2023-2030 and has been guided by a Shared National vision for forestry in Ireland. Having reviewed the documentation, the MPT comments as follows:

#### **Current State of the Environment**

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.



### **SEA Objectives**

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.

### **Environmental Assessment of Significant Effects and Mitigation Measures**

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.

### **Appendix A**

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.

### **Conclusion**

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 improving its transparency.

Should you have any questions regarding the content of our response please do not hesitate to contact us.

Yours sincerely



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