

**Coillte's Contribution to Ireland's Nature
Restoration Plan (NRP)**

**A Submission to the Independent Advisory
Committee (IAC) on Nature Restoration**

16th February 2026

Introduction

The Independent Advisory Committee (IAC) are advising the Irish Government through the provision of recommendations relating to the development and content of the Irish draft National Restoration Plan. Coillte welcomes the engagement directly with the IAC and via the IAC Leader's Forums which have been extremely valuable and informative.

The purpose of this submission is for Coillte to provide more specific detail to inform the IAC on potential measures within the Coillte Estate that can contribute to nature restoration in Ireland. Coillte has mapped 30% of its estate to be managed primarily for nature. This represents a significant resource for nature. It comprises approximately 112,000ha of biodiversity areas – habitats of ecological value – plus more than 20,000ha of riparian buffers and small environmental features that occur across the estate.

In 2000, Coillte commenced a nature conservation programme on its estate. The Coillte estate consists of a varied tapestry of different habitats ranging from forest to peatland, to upland, to lakes and rivers. All parts of the estate are available as habitat and therefore offer value for biodiversity. It is our view that many of the ambitions within the NRP will be complementary to Coillte's strategic ambition and in particular, the ambition to implement a range of appropriate management actions across the 30% of the Coillte estate that has been prioritised for nature management.

Coillte's Forests for Nature Programme

Coillte is committed to balancing and delivering the multiple benefits of forests for climate, nature, wood and people. Using a science-based approach called BioClass, Coillte has assessed and mapped approximately 112,000ha of its lands as biodiversity areas. These lands represent the habitats of best ecological value on the estate. The Coillte estate is a rich nature resource, and the biodiversity areas comprise the best of a broad range of habitats, from conifer, mixed and native forests to open peatlands, heaths, lakes and rivers, all of which support a range of plants and animals.

Coillte operates a rolling annual programme of nature management actions in biodiversity areas, but the ambition is to scale up this activity considerably, to support delivery of national biodiversity initiatives, such as the Nature Restoration Plan, the National Biodiversity Action Plan and the Natura 2000 network of SACs and SPAs.

Coillte's estate contains and supports a range of habitats and species that are listed on the EU Habitats and Birds Directives. For those habitats and species, Coillte can contribute towards the national targets developed under Article 4. In addition to this, we have many more locations that can play a significant role in delivering nature restoration beyond designated sites, making a significant contribution to Article 12 of the NRP.

Nine measures for Coillte partnership on the NRP.

Appendix 1 to this document sets out nine measures, proposals or topic areas that we believe can be delivered on Coillte lands in support of the NRP. The table below summarises the measures. This detail is now being provided to facilitate the IAC understanding of work already ongoing and interventions that are possible under the NRP with the right supports including funding and people resource, prioritisation, governance and legal frameworks.

Measure Number	Description
1.	The Implementation of Coillte’s BIOForest Programme: an overarching mechanism for delivering nature conservation at scale
2.	The Restoration & Enhancement of Multi-species Forest Habitats for Nature
3.	The Restoration & Enhancement of Native Forest Habitats
4.	The Restoration & Enhancement of Peatland Habitats
5.	The Redesign of Selected Peatland Forests for Nature
6.	The Delivery of Measures to Support the Conservation of Hen Harrier and Merlin
7.	The Development of Monitoring, Reporting and Verification (MRV) of Nature Benefits
8.	The Control of Deer Populations at Landscape-scale to Support Improvement in Habitat Condition
9.	A Review and Refinement of Regulatory Procedures in order to Support Nature Conservation Actions

The support mechanisms are critical for nature conservation

Coillte’s Forest for Nature ambitions go well beyond statutory obligations and business as usual or normal operations. The implementation of ambitions is very much dependent on provision of additional funding supports to Coillte and partners.

Nature and Carbon+ credits are emerging as a potentially valuable way of leveraging private finance to complement public funding¹ to enable these ambitions. This submission outlines the

¹ [Nature Credits Roadmap to reward nature-positive action and boost private finance](#)

potential contribution of Coillte to the NRP with the correct supports in place. It is also important that the NRP is cognisant of regulatory and additionality tests and ensures that access to potential funding through Nature or Carbon+ credits is not adversely limited or prohibited.

Next Steps

Coillte can provide further detail as necessary and are available to engage further with IAC to provide any further insight or information as required.

Appendix 1

Measures for NRP relevant to Coillte Lands

MEASURE 1: The Implementation of Coillte’s BIOForest Programme: an overarching mechanism for delivering nature conservation at scale

Type of ecosystems that will benefit from this measure:

- Forest and woodland ecosystems;
- Wetland ecosystems (coastal and inland);
- Heath, shrub and scrub ecosystems;
- River, lake, alluvial and riparian ecosystems;
- Rocky, dune and sparsely vegetated ecosystems.

This measure is relevant to Article 4, because the Coillte estate and biodiversity areas includes habitats listed on Annex I and species listed on Annex II of the EU Habitats Directive, as well as birds listed on Annex I of the Birds Directive.

This measure is also relevant to Article 12, because many of the forests selected as Coillte’s biodiversity areas do not conform with the national definitions of Annex I, yet they support forest flora and fauna and display characteristics that indicate they have ecological value.

Description of the Measure

Funding to support Coillte’s BIOForest: a programme to deliver nature conservation

Coillte has always implemented initiatives to ensure nature conservation within its estate. Since 2019, Coillte has established and implemented a specific BIOForest programme, which is a rolling annual programme of management actions in biodiversity areas. The types of operations conducted include:

- Invasive species control (primarily rhododendron and cherry laurel);
- Continuous Cover Forestry (CCF) to enhance natural values of forests;
- Clearfell and replant either with native species or diverse species mix;
- Fencing and other control measures to reduce grazing pressure;
- Removal of conifer forests from open habitats of nature conservation value (e.g. raised bogs, blanket bogs, limestone pavement, coastal dunes)²;
- Control of lodgepole pine on open peatlands, including unplanted and restored bogs;
- Re-wetting of unplanted and/or restored raised bogs;
- Targeted measures to enhance species on the estate, e.g. lesser horseshoe bat and hen harrier.

² Since 2021, this activity has become more challenging due to the introduction of a requirement for formal planning approval for all projects that involve tree-felling without replanting. As a consequence, this activity has not taken place in biodiversity areas in recent years

Currently, the BIOForest programme delivers actions annually on hundreds of hectares of different habitats: native forests, mixed forests, raised bogs and blanket bogs, plus rare habitats such as coastal dunes and limestone pavement. Coillte's ambition is to scale up this work considerably and deliver more benefits for nature across multiple sites amounting to thousands of hectares.

The Coillte estate is a significant nature resource: broad range of ecologically valuable habitats, both Annex I habitats and other habitat types, and including some very large sites (800-1,000ha for peatlands and >300ha for forests) that are unique and ecologically significant in a national context. The estate also supports a range of birds and other species protected under EU Directives.

Coillte's ambition is to scale up – through its BIOForest programme – implementation of nature conservation actions across the estate.

Coillte has the capacity to mobilise operations across multiple sites throughout the country. We have experience building the contractor base and skillsets required to deliver land management and nature conservation actions at scale.

We have identified the key enablers that would support delivery:

- A flexible, multi-annual funding scheme aligned to Coillte's scale;
- Regulatory reform to reduce the complexity of multiple (often competing) requirements that hamper project delivery and greatly inflate costs;
- A cross-sectoral strategy and support for control of deer populations at a landscape level; and
- The development of effective and efficient MRV systems to demonstrate the outcome from nature interventions.

Recreation: a model for delivering action

Over a number of years, Coillte, with funding from the Department of Rural and Community Development and the Gaeltacht (DRCDG), has delivered a multi-annual programme to develop and maintain recreation facilities for the enjoyment of local communities nationwide across the Coillte estate. This programme has been proven to deliver tangible health, social and economic benefits for rural Ireland.

We believe that the structure and approach in the delivery of this DRCDG-funded programme is transferable to nature and that a similar funding model can be developed that would enable Coillte to deliver nature conservation actions at scale in support of the NRP.

MEASURE 2: The Restoration & Enhancement Multi-species Forest Habitats for Nature

Type of ecosystems that will benefit from this measure:

- Forest and woodland ecosystems.

Description of the Measure

Funding to support the restoration & enhancement of mixed forests.

There are approx. 65,000ha of forest habitats included in Coillte's biodiversity areas, and the majority of these are mixed forests, comprising a range of conifer, broadleaved tree and shrub species in the canopy and understorey. The management objective is to increase the species and structural diversity of these forests, which in turn improves their habitat value for a range of micro-organisms, flora and fauna.

Coillte developed a Forest Scoring system called BioClass, a tool that enables assessment of ecological value based on qualifying or recording a prescribed list of biodiversity features and natural values. The goal is to implement management actions that increase the presence and abundance of these biodiversity features and natural values, which will in turn improve the habitat value of the forests over time.

This category includes most of Coillte's Old Woodland Sites (OWS), that are sites that have supported forest cover since the 1830s. These forests have been highly modified by human intervention over hundreds of years and, but in the context of Ireland's forest history – in which there was almost total loss of all forests – old woodland sites are important. Many of them – through the presence of biodiversity features and natural values – show potential for improving their habitat quality. Some of the OWS are large, extending to well over 200ha. In an Irish context, this is significant. No other landowner can deliver management of large sites such as these.

These forests support a range of native flora and fauna. The management goal is to manage in a way that improves their habitat value, increases and maintains the overall tree species diversity (as well as increasing the proportion of native species present), prevents over-dominance by any one tree species (e.g. sycamore, beech, hemlock etc.) and controls invasive species and grazing.

Management actions to achieve the objectives include:

- Continuous Cover Forestry (CCF), which carefully selects trees for removal or retention, to achieve management objectives. The transition to a more diverse forest is achieved gradually, while retaining a forest environment throughout. In consultation with ProSilva and EFI, Coillte has developed a CCF approach that proactively supports biodiversity values of the forest. In most cases, while timber is produced, the costs of planning and managing the CCF operation outweigh the revenues.

- Clearfell and replant with a species mix of tree species suited to site conditions. This is the approach adopted on sites that are not silviculturally suited to CCF;
- Control of Invasive species (primarily rhododendron and cherry laurel);
- Fencing and other control measures to reduce grazing pressure.

This approach will increase the following indicators that constitute Article 12 of the NRP:

1. Share of forests with uneven-aged structure;
2. Tree species diversity;
3. Volume or frequency of standing deadwood;
4. Volume or frequency of lying deadwood;
5. Stock of organic carbon.

MEASURE 3: The Restoration & Enhancement of Native Forest Habitats

Type of ecosystems that will benefit from this measure:

- Forest and woodland ecosystems;
- River, lake, alluvial and riparian ecosystems.

Description of the Measure

Funding to support the restoration & enhancement of native-species forests.

There are approx. 65,000ha of forest habitats included in Coillte's biodiversity areas, and approximately one-third of these are either currently native forests or are conifer forests where there is a strong indication that they are suitable for conversion to native forest.

All of Ireland's Annex 1 forest habitats are represented on the Coillte estate: sessile oakwood, alluvial forest, bog woodland and yew woodland and woodland associated with limestone pavement. But there are also extensive native forests that may not conform to any of these categories, and so a broader measure is proposed that encompasses all native forests.

Coillte developed a Forest Scoring system called BioClass, a tool that enables assessment of ecological value based on qualifying or recording a prescribed list of biodiversity features and natural values. The goal is to implement management actions that increase the presence and abundance of these biodiversity features and natural values, which will in turn improve the habitat value of the forests over time.

These forests support a range of native flora and fauna. The management goal is to manage in a way that improves their habitat value, increases and maintains the overall tree species diversity (as well as increasing the proportion of native species present), prevents over-dominance by any one tree species (e.g. sycamore, beech, hemlock or spruce) and controls invasive species and grazing.

Management interventions to achieve the objectives include:

- Control of Invasive species (primarily rhododendron and cherry laurel);
- Fencing and other control measures to reduce grazing pressure;
- Removal or control of non-native tree species, e.g. beech, sycamore, conifers (except Scots pine and yew);
- Continuous Cover Forestry (CCF) managed will be implemented for native stands that have a uniform structure and poor forest flora. CCF management achieves a gradual transition to a more diverse forest, while retaining a forest environment throughout. In consultation with ProSilva and EFI, Coillte has developed a CCF approach that proactively favours biodiversity values of the forest stand. In some cases, timber is produced from native species, but the costs of planning and managing the CCF operation outweigh the timber revenues;

- Clearfell and replant with a species mix of native tree and shrub species suited to site conditions.

This approach will support delivery of targets for Annex I forest habitats, as stated under Article 4, but will also enhance 5 of the 6 Article 12 indicators:

1. Share of forests dominated by native tree species;
2. Share of forests with uneven-aged structure;
3. Volume or frequency of standing deadwood;
4. Volume or frequency of lying deadwood;
5. Stock of organic carbon.

MEASURE 4: The Restoration and Enhancement of Peatland Habitats

Type of ecosystems that will benefit from this measure:

- Wetland ecosystems (coastal and inland);
- Heath, shrub and scrub ecosystems;
- River, lake, alluvial and riparian ecosystems.

Description of the Measure

Funding to support the restoration & enhancement of peatland habitats.

The Coillte estate comprises a large expanse of peatlands. The full range of Ireland's peatland habitats are represented: blanket bog, raised bog, heath and fen.

In the development of our Strategic Vision in 2022, Coillte combined carbon modelling with our forest management models, to determine the optimum approach to the continued management of peatland forests. It was determined that some of these peatland forests could have a different management approach. Combining carbon considerations with nature conservation objectives, three alternative management approaches for selected forested peatlands were identified, which are described below.

Overall, biodiversity areas include approx. 45,000ha of peatland habitats of ecological value that are recommended for habitat enhancement or restoration of various kinds. Other extensive areas are recommended for peatland forest redesign.

i) The enhancement of unforested peatland habitats

The Coillte estate includes large expanses of open peatland habitats that were either never planted with trees or were restored through forest removal since 2002. Biodiversity areas include the best of these open peatland habitats, amounting to 10,000ha in lowland locations and 26,000ha in uplands. Some are of very high ecological quality.

Management interventions to enhance open peatlands include:

- Re-wetting through measures such as drain-blocking, bunding or other techniques;
- Removal/control of naturally regenerating trees;
- Control of Invasive species (primarily rhododendron and cherry laurel);
- Fencing and other control measures to reduce grazing pressure.

ii) The restoration of afforested blanket bog and raised bog (forest-to-bog)

Biodiversity areas identify the forests with best potential for restoration of the pre-forest peatland habitat. We collaborate with NPWS to identify the forests with best restoration potential for peatland habitats and species.

To date, Coillte's biodiversity areas include approximately 7,500ha of forests that have been assessed as having potential for restoration of quality peatland habitats – depending on location, the target habitat is upland blanket bog/heath, lowland Atlantic blanket bog or raised bog.

Implementation of forest-to-bog projects is currently significantly hampered by complex regulatory procedures and escalating costs.

Management interventions to achieve forest-to-bog include:

- Tree-felling to remove conifer trees;
- Brash management (e.g. wind-rowing);
- Re-wetting through measures such as drain-blocking, peat-smoothing, bunding or other techniques;
- Removal/control of naturally regenerating trees;
- Control of Invasive species (primarily rhododendron and cherry laurel);
- Fencing and other control measures to reduce grazing pressure.

iii) The redesign of other selected peatland forests for nature is outlined in Measure 5, below.

MEASURE 5: The Redesign of Selected Peatland Forests for Nature

Type of ecosystems that will benefit from this measure:

- Wetland ecosystems (coastal and inland);
- Heath, shrub and scrub ecosystems;
- River, lake, alluvial and riparian ecosystems.

Description of the Measure

Funding to support the redesign of selected peatland forests.

This measure complements Measure 4, the Restoration of Peatland Habitats, but incorporates measures to develop a mosaic of forest/scrub and open habitats, to improve habitat quality.

In addition to areas managed primarily for nature on its estate, Coillte has identified a large area of peatland forests (a further c. 30,000ha), many of which are in ecologically sensitive locations, that could be managed primarily for climate, but in a way that also delivers nature restoration. In these locations, it is proposed to convert the existing forests to open mixed stands, interspersed with open spaces, water, bog and heath. This will be delivered through a process of peatland forest *redesign*.

Management interventions to achieve peatland forest redesign include:

- Tree-felling to remove conifer trees;
- Brash management (e.g. wind-rowing);
- A combination of natural regeneration and, if required, supportive replanting with mixed species;
- Limited re-wetting through measures such as drain-blocking;
- Control of densely regenerating conifer trees;
- Control of invasive species (primarily rhododendron and cherry laurel).

MEASURE 6: The Delivery of Measures to Support Conservation of Hen Harrier and Merlin

Species that will benefit from this measure:

- Hen harrier and merlin are both listed on Annex I of the EU Birds Directive.

Description of the Measure

Funding to support the conservation of the hen harrier and merlin.

This specific measure is proposed under Article 4, primarily for the conservation of two bird species that are closely associated with forestry and for which forest design and forest management are important factors. Measures to protect other birds and mammals would also feature under the BIOForest programme initiatives (Measure 1).

Hen harrier and merlin are raptors that favour upland habitats. As such, there is a strong interaction between the conservation of these birds and the objectives of peatland habitat restoration and forest redesign in uplands.

Hen harrier is a ground-nesting bird that breeds in open bog and heath, as well as young, pre-thicket forests. Merlin is a cryptic species that favours upland bog and heath habitats but also nests in conifer trees close to the edges of forests where they adjoin open bog/heath.

Collectively, approx. 90,000ha of Coillte land is included in the SPAs designated for one or both of these species.

Potential management interventions are likely to also benefit other upland birds.

Management interventions to support the conservation of these species include:

- Peatland forest redesign to create forest mosaics (see Measure 5, above);
- Conversion of forests to open bog/heath (see Measure 4, above);
- The development of MRV systems to measure the impact of interventions on hen harrier and merlin populations;
- Develop best practice guidelines, including dynamic bird surveys, to minimise disturbance by forest operations, during the nesting period.

MEASURE 7: Monitoring, Reporting and Verification (MRV) of Nature Benefits

Contribution to the NRP:

- This Measure is universally relevant to Articles 4 and 12.

Description of the Measure

Funding to support the development of effective and efficient systems and standards to monitor, report and verify the nature benefits of management interventions.

The NRP requires Ireland to mobilise nature conservation actions significantly at national and local levels. There will be a need to engage funding from public and private sources, which in turn will require us to monitor, quantify and report outcomes that represent tangible benefits for nature.

Measurement, Reporting, and Verification (MRV) for nature-based projects is a framework that quantifies, documents, and certifies environmental outcomes like carbon sequestration, biodiversity improvements, or ecosystem health. It ensures transparency and accuracy,

Traditional, manual, and cost-intensive field surveys are increasingly replaced by Digital MRV or "dMRV," which uses AI, remote sensing, and satellite data for real-time, scalable, and more accurate monitoring.

MEASURE 8: The Control of Deer Populations at Landscape-scale Control to Support Improvement in Habitat Condition

Contribution to the NRP:

- This Measure is universally relevant to Articles 4 and 12.

Description of the Measure

Funding to develop and implement a national strategy for the control of deer populations, and site-level measures to protect habitats from grazing.

Overgrazing refers to the effects on habitats when numbers of grazing animals present exceed the levels that would allow natural ecosystem processes to take place.

In Ireland, overgrazing of wild habitats is due to unnaturally high numbers of wild deer in the landscape. All species of deer are at issue here – the introduced species (for example sika deer, fallow deer, muntjac) but also the native red deer, if their numbers are not controlled. In localised situations, the presence of feral goat populations presents a threat.

Ireland lacks any natural predators and so the population numbers of wild deer and goats must be controlled through a national cull that is managed, coordinated and targeted.

The objective is to reduce national deer population and maintain at a level that does not inhibit the development and function of forests and other habitats. For forest habitats, the numbers of deer need to be below 5-10 per km² if broadleaves are to regenerate. Current indications are that deer populations in some parts of the country exceed 40 per km², indicating the severity of the problem and the scale of population reduction required.

Coillte participates actively in the Irish Deer Management Strategy Group (IDMSG) and will collaborate to implement the Irish Deer Management Strategy, once developed.

Management interventions to mitigate the risk of over-grazing by deer include:

- In the shorter term, direct protection measures such as fencing and tree shelters;
- Landscape level and coordinated programs of culling;
- Strategic development of markets and supply-chains to utilise venison in our food supply
- Monitoring and impact assessments to demonstrate effectiveness, e.g. record evidence of regeneration and recruitment of trees and good ground flora.

MEASURE 9: A Review and Refinement of Regulatory Procedures in order to Support Nature Conservation Actions

Contribution to the NRP:

- This Measure is universally relevant to Articles 4 and 12.

Description of the Measure

Concerted action to address the need for regulatory simplification to ensure efficient action on nature conservation projects.

Planning Permission for Peatland Restoration: Many projects that involve removal of forest and conversion to open habitats require formal planning permission from local authorities because they are deemed to constitute land use change under planning regulations. This substantially increases the costs and duration for such projects. The cost of obtaining planning approval for sites of over 70ha are higher because of the requirement to produce an EIAR. However, even for relatively small restoration projects (<70ha), the costs per hectare of planning process are considerable and, in many cases, prohibitive; this affects raised bog restoration projects in particular, given their smaller size.

There is a need for planning reform to facilitate restoration projects. This could include revisions to the Planning and Development Regulations to classify nature-related management interventions as exempted development. For example this could include developments requiring works or a material change in the use of land in the following scenarios:

- Developments directly connected with or necessary to the management of a European Site.
- Development undertaken for the conservation of species or habitat attributes of a Natural Heritage Area (NHA).
- Development which is necessary to achieve the targets set out in the National Restoration Plan for Ireland.
- Development which is undertaken to comply with a Ministerial Direction.

Conflicting Timing Restrictions: The implementation of the Habitats and Birds Directives can result in competing or conflicting requirements. For instance, in large areas within upland SPAs, forest operations are confined to the winter months (October-February) to avoid impacts on breeding birds. This conflicts with water quality guidance which requires that these operations should be conducted during the summer months, when vegetation growth is at its peak and therefore more effective in mitigating any potential impacts on water quality.

It is our view that regulation needs to be adjusted to allow for dynamic survey-based approaches to guide prioritisation of operations within SPAs.