



IRISH TIMBER GROWERS ASSOCIATION

17 Castle Street, Dalkey, Co. Dublin, A96 AH57
Tel: +353-1-2350520 Fax: +353-1-2350416
Email: info@itga.ie
www.itga.ie

Irish Timber Growers Association submission on the draft National Mitigation Plan

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The Irish Timber Growers Association (ITGA) was established in 1977 and is the national representative body of private woodland owners in Ireland. The membership of the Association mirrors the wide range of different timber growers in the country and current membership includes farm forest owners, forestry co-operative members, private woodland estates, forestry investors and forestry pension funds. This wide range of membership allows the Association take a broad view of the industry and issues facing the sector.

The Irish Timber Growers Association welcomes the opportunity to make this submission on the draft National Mitigation Plan to the Climate Policy Division of the Department of Communications, Climate Action and Environment.

There are now significant opportunities for the forestry sector to play a critical role in the National Mitigation Plan and this role must be prioritised in Climate Change Policy, particularly given the marginal cost per tonne of carbon abated which is calculated as c.€20 for the Forestry Programme as against c.€550 per tonne for the Rural Development Programme in the draft National Mitigation Plan (page 91). Many of the additional benefits of forest products and forestry's potential contribution to renewable energy through increased use of forest residues as biomass may not be reflected in these figures.

Forests provide a range of raw materials for industry in addition to many services to society. One of the most important services provided by forests, climate change mitigation, is strongly dependent on having young age classes to balance out harvest and other reductions in carbon stocks. In order to sustain this absorption of carbon dioxide a well balanced age structure is needed at national forest level in addition to ongoing active management of the forest estate.

Afforestation and creation of new woodland

From studies undertaken, it has been estimated by COFORD that there is a need to continue afforestation at a level of 15,000 hectares per annum for the next two decades to sustain the ability of our national forest estate to remove carbon dioxide from the atmosphere in the longer term. Achieving this aim will also provide a renewable energy resource into the future by facilitating the replacement of fossil fuels as a source of energy through the utilisation of forest residues as biomass. In addition, an afforestation programme of 15,000 hectares per annum will also ensure sustainable raw material for construction and a range of other uses

with knock on benefits for the longer term storage of carbon. Expansion of the national forest estate should therefore be a key component of Ireland's National Climate Change and Land Use Policy. This objective has not been given adequate priority in the draft National Mitigation Plan (NMP).

The afforestation figures quoted in the Draft National Mitigation Plan (P.82) of 7,140 hectares in 2017, increasing incrementally to 8,290 hectares in 2020 are significantly below that recommended in the 'Forest Policy Review: Forests, products and people – Ireland's forest policy – a renewed vision,' (see page 88 of draft NMP). Forest Policy has an annual planting target of 15,000 per annum from 2016 as outlined in the Forest Policy document.

If the current afforestation rate continues into the future, this will have significant repercussions on Ireland's ability to meet its international climate change targets in addition to its negative effect on related renewable energy targets given forests are a source of biomass for renewable energy. As highlighted on page 83 of the draft NMP, '*Achieving the anticipated renewable energy usage in the three energy sectors will be very challenging*'.

Also, the low planting level will have repercussions on the industry's future supply of timber for processing into long lived carbon storage products and also ultimately affecting exports, employment and the rural economy. Forestry is a long term investment for individuals and the Irish State and it will pay significant economic, environmental and climate change dividends into the future where the required afforestation levels are achieved as outlined in national forest policy. The shortfall in achieving our forest policy planting targets will have more significant knock on effects in future decades. In this regard, ITGA welcomes the Plan's Mitigation measure under consideration Forestry AF10J - Forest Cover Expansion Post-2020, however, this measure cannot be achieved at current planting levels and must be prioritised in the shorter term as a major climate change mitigation measure.

Role for forestry in climate change mitigation

As outlined in the discussion document on the potential for Greenhouse Gas (GHG) mitigation within the Agriculture and Forestry sector (P.41), 'the forestry sector provides a range of opportunities to mitigate rises in greenhouse gas levels, including:

- afforestation/reforestation;
- forest management;
- reduced deforestation (land use change from forest to non-forest);
- increased use of wood products;
- use of forest products for bioenergy to replace fossil fuel use.'

The following must be encouraged and actively supported and prioritised in the National Mitigation Plan to ensure our national forests role is optimised in Climate Change Mitigation:

- Increasing significantly the afforestation rate to achieve already stated Forest Policy targets.
- Fostering and supporting active forest management
- Encouraging wood and forest residue mobilisation
- Increasing the use of wood products
- Utilising a wider range of forest products for bioenergy to replace fossil fuels
- Knowledge Transfer and innovative forest technology to facilitate the above.

As outlined in the discussion document on the potential for Greenhouse Gas (GHG) mitigation within the Agriculture and Forestry sector (P.29), one of the four main focus areas of the Agriculture Sector Mitigation Action Plan will be 'Increasing the level of forest cover and use of wood products and fuels'. The current draft National Mitigation Plan falls short on addressing this objective.

As outlined on page 80 of the draft National Mitigation Plan, '*Methane (CH₄) and nitrous oxide (N₂O) make up the majority of Irish agriculture GHG emissions, mainly due to the dominance of cattle and sheep livestock production. Methane is the most significant GHG emitted from agricultural activity in Ireland, accounting for 63% of total agricultural emissions.*' The draft Plan outlines how afforestation and forest management practices can contribute significantly to climate change mitigation but policy planting targets are not being achieved. Afforestation is most suited to lands which are currently under livestock production and planting such lands would therefore displace the emissions emanating from livestock production while in addition sequestering carbon within the new forest. Afforestation therefore would have a significant increased benefit in both reducing emissions and also storing increased carbon where such land is planted. Given the general poor profitability of livestock farming as highlighted in successive Teagasc National Farm Surveys over recent years it is difficult to understand why afforestation is not significantly favoured in Irish agricultural policy. Also, given the marginal cost per tonne of carbon abated which is calculated as c.€20 for the Forestry Programme as against c.€50 per tonne for the Rural Development Programme [as in the draft National Mitigation Plan, page 91], the benefits of forestry are clear. This is particularly the case when Ireland is so suited to the growing of trees, more suited than the rest of Europe, while we only have 11% of our land area under trees, forest cover in Europe is c. 40%.

The Irish Timber Growers Association, through its work and various information and representation initiatives is committed to supporting the sector's critical role in contributing to climate change mitigation. ITGA is actively supporting and promoting forestry's climate change mitigation role in afforestation and active forest management, increasing the use of wood products and also in utilising forest products for bioenergy to replace fossil fuels. These aims are progressed through the various information initiatives of the Association.

ITGA will continue to play a leading role in achieving the potential for Greenhouse Gas mitigation within the Agriculture and Forestry Sector and the Association looks forward to working with the Department and industry in meeting this objective.