



IRISH TIMBER GROWERS ASSOCIATION

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Irish Timber Growers Association submission in relation to the review of Section 40 of the Wildlife Act - Burning/Cutting Controls

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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 in relation to the review of Section 40 of the Wildlife Act - Burning/Cutting Controls.

In recent years there has been a significant increase in the incidence of forest fires and wildfires in Ireland. Teagasc have highlighted that in 2011 some 16,000 hectares, mostly valuable habitat, were destroyed by wildfires costing €20 million in addition to 3,000 hectares of productive forestry destroyed in 2010 / 2011 period alone.

This incidence of forest fires resulted in the Department of Agriculture, Food and the Marine developing a Code of Practice for Prescribed Burning with the sector. This publication was launched in 2012 by the Minister of State for Forestry at the time, Shane McEntee TD who stated at the launch and in the accompanying press release, ‘...*This is one of the most important recommendations of the Working Group as it addresses one potential source of land fires and, as experience has shown us when such fires get out of control, they become the source of many forest fires.*”

The current Minister of State for Forestry, Tom Hayes TD, mentions the risk and impact of forest fires in his newsletter Issue 3 March 2014, and states, ‘*To put this in context, it is estimated that around 1,500 hectares of forestry were lost to fire in 2011. That represents almost a quarter of the total new planted area under my Department’s afforestation schemes in that year. The cost of fire suppression in and replacement of State-owned forests is estimated to be over €8 million. That figure does not include the value of lost timber crops or the future wealth and employment that would have been generated as a result of their harvesting and processing.*’

See

<http://www.agriculture.gov.ie/media/migration/aboutus/ministersnewsletters/ministerhayesnewsletter/Issue3MinHayesFinal260314.pdf>

It is the sector's experience that uncontrolled burning is a very significant if not the main source of forest fires. In Ireland, fire poses the greatest risk to young forests and this review of Section 40 of the Wildlife Act is an opportunity to reduce this risk by ensuring specific actions are taken prior to and during any controlled burning along the lines outlined in the Department of Agriculture, Food and the Marine's Code of Practice for Prescribed Burning.

To permit controlled burning within the current closed period (1st March – 31st August) would certainly lead to a greater risk of fire spreading given the drier period from March 1st and would therefore significantly increase the fire risk to our forests. With the forest reconstitution grant no longer available for forest fires the entire risk of fires is now exclusively with forest owners. This has implications for future insurance costs, fire prevention costs and potential fire losses to the forest owning community.

The Irish Timber Growers Association have become concerned about the proposed burning of large areas of commonage in relation to the proposed new GLAS Scheme and the significant fire risk that this practice will pose to our members forests. The recent report in the Irish Farmers Journal that the *'huge areas of commonage that are now overgrown would have to be brought back to grazing condition, including by controlled burning, and this will be stipulated in CMPs'*, (Commonage Management Plans) will increase risk of forest fires in already high risk areas and potentially increase forest insurance costs and insurance availability.

Legislation acknowledges the significant fire risk posed by burning of vegetation and under Section 39 of the Wildlife Act, 1976, if one intends burning within one mile of a forest one must notify the local Garda Station and the forest owner, who has the right to object by counter-notice. This requirement to notify the local Garda Station and the forest owner if a landowner intends to engage in controlled burning does not appear to be well known and should be highlighted and enforced in the future in tandem with any new licensing or other procedures.

The Irish Timber Growers Association submit the following;

1/ That given the proven significant risk of forest fires from 'controlled' burning that no burning should be permitted outside the current opened period of 1st Sept to 28th February.

2/ ITGA submit that landowners must seek and secure a burning licence from the relevant Department in order to burn at any time within the open period 1st Sept to 28th February when burning is proposed within 1.6 km of any forest area. This could operate with current legislation, where if one intends burning within one mile of a forest one must also notify the local Garda Station and the forest owner, who would retain the right to object by counter-notice.

3/ It should also be a pre-requisite that all those who intend to undertake controlled burning must provide to the relevant Department proof of full third party insurance to cover neighbouring forests/lands for any and all losses that might be caused through their burning activities. These losses should include both investment loss of the tree crop and also the cost of replanting after fire damage.

4/ That where a forest fire occurs as a result of any scrub/vegetation burning a forest reconstitution grant would be made available to fund the replanting of any forest area so destroyed by fire.