



IRISH TIMBER GROWERS ASSOCIATION

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Irish Timber Growers Association submission to the independent review of DAFM support schemes for landowners impacted by Ash Dieback

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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 to take a broad view of the industry and issues facing the sector.

ITGA encourages and supports a considerably improved Reconstitution and Underplanting Scheme (RUS) for Ash woodlands affected by Ash Dieback (*Hymenoscyphus fraxineus*) and the Association welcomes the opportunity to make this submission to the Review Group.

Since the discovery of Ash dieback in Ireland in October 2012 there have been regular surveys undertaken by DAFM which show the consistent progression of the disease and the susceptibility of our Ash tree population. The most recent survey in 2022 showed that the disease has spread throughout Ireland with significant findings in all 26 counties in the Republic.

The response by DAFM with the introduction of the Reconstitution Scheme (Chalara Ash Dieback) for younger Ash forests in 2013 was positive and met with the engagement and active uptake by growers and the forestry services sector. With the relentless progression of the disease, this scheme required revision to reflect the expanding incidence and increasing age profile of infected Ash plantations. In 2018, DAFM commenced a review of the national response to Ash dieback including the then Reconstitution Scheme on the basis that eradication of the disease was no longer a possibility and suspended the grant scheme that had been in place since 2013. There was subsequently no support scheme for growers or the sector for over 2 years with forest owners and infected plantations left in abeyance as growers watched their Ash either succumb to infection or deteriorate significantly during this period. This 2-year hiatus affected Ash owner's and sector confidence in the national response, and more significantly, our growers lost valuable time and revenue in not replacing their infected Ash crop.

In 2020, a new Reconstitution and Underplanting Scheme (RUS) was launched and since this revised RUS Scheme was initiated, it has been subject to stop/start availability and has been subject to various amendments which have further affected the confidence and morale of both the growers and the sector. Where a conscientious Ash grower wished to fell and replant the diseased Ash crop at their own cost, when no RUS scheme was in place over this period or subsequently, there was always the requirement for a Tree Felling Licence (TFL) with related professional costs, time and significant TFL delays, these ongoing barriers to action have had a significant affect on forest owner's sense of autonomy and control over their plantations. The past stop/start approach and ongoing changes to the RUS scheme, with growers unable to affect appropriate works, address the disease and its progression, or to effect improvement in their forest while observing their investment deteriorate and their forests die has had longer term impacts on growers. The experience has left a legacy of personal and financial loss and understandably also a crisis of confidence in the wider forestry sector together with the negative effect on biodiversity and these ecosystems nationally, with the loss through the death and decline of our Ash tree species. The nature of the reaction to Ash dieback and how it was managed nationally since its emergence in 2012 reflects deep personal, financial, social, and environmental impacts that Ash growers have experienced together with the lack of empowerment felt by owners not being permitted to address dying Ash due to Tree Felling Licence delays and the stop/start nature of the RUS Scheme since 2018.

This review of the DAFM approach and supports for landowners affected by Ash Dieback and the future design and implementation of considerably improved support schemes for those impacted by Ash Dieback is critical to owners of Ash plantations and it must also look to build future confidence in the wider forestry sector.

Reflecting the deep dissatisfaction and disillusionment of forest owners that have Ash woodlands, the Irish Timber Growers Association would make the following points on the general importance of improving the available supports and the Reconstitution and Underplanting Scheme (RUS);

- The improvement of the RUS Scheme is critical in maintaining the confidence of growers and the wider sector in the new Forestry Programme by ensuring that there is an adequate safety net in place for those who established Ash woodlands under the State afforestation programme.
- The RUS Scheme must assist in maintaining the economic and social values and benefits associated with these woodlands, including continued and improved carbon sequestration into the future.
- Woodland owners and their foresters must be encouraged through an improved scheme to take prompt measures to address the disease. Forest owners need to be encouraged to take centre stage and be given more autonomy in progressing the replanting of these areas. Woodland owners must be directly engaged, and RUS approvals must be issued promptly to ensure growers buy in.
- Infected Ash plantations present serious health and safety risks to forest owners, foresters and the public and there is now considerable urgency in dealing with older Ash woodlands, particularly adjacent to public roads or in areas used by the public.

To address the above, the following measures are urgently required;

- The RUS application process must be simplified, made more flexible with a prompt turnaround time for approvals and be consistent in its approach. The scope and need for Further Information Requests from DAFM must be reduced. A separate streamlined RUS application process within DAFM should be introduced to facilitate the prompt turnaround time for applications to the scheme. There should be a senior inspector given responsibility for achieving prompt approval times well within 3 months of receipt of submitted applications.
- The RUS Scheme must cover the full clearance and reestablishing costs for the infected areas.
- The RUS Scheme must permit greater flexibility in species choice by the applicants.
- Given the extent of Ash dieback in all 26 counties and its progression within forests, the underplanting element of the current RUS Scheme should be reconsidered as this is likely to lead to future health and safety risks within the area when these trees invariably become infected with consequent future costs for both forest owners and the State in addressing this in the future.
- The RUS Scheme must have an additional element to cover the significant expense of tree surgery where there are roadside Ash trees infected, that covers the additional costs in such tree removal and potentially public road traffic management where this is required.
- New forest premiums should be paid out to the forest owners of Ash plantations who replant under the RUS scheme. The premiums should be paid under the new Forest Programme rates for the full duration of the premium period to reflect the loss the grower has experienced due to the delay in addressing Ash dieback and the years for which there was no RUS scheme in place.
- The RUS Scheme should include compensation for the full value of the Ash crop removed.
- The RUS Scheme clearance grant should be improved further for older plantations and those adjacent to public roads.
- Where the owner decides to replant broadleaves under the RUS Scheme, where deer are present the full cost of appropriate deer fencing should be allowed within the grant costs.
- A public information campaign on the Health and Safety dangers of diseased Ash, including within forests, adjacent to roadsides and in areas with public access is required.
- The RUS Scheme must be actively promoted through all relevant State agencies.

Following the publication of the DAFM Plant Health & Biosecurity Strategy 2020-2025, ITGA called for an Implementation Plan and an Emergency Response Plan for future pest outbreaks. The Mid-Term Review (2022) lists these two issues under '*Important Steps for Us to Include*'.

At a presentation at the 2020 National Forestry Conference, ITGA pointed out that physical inspections may be insufficient since some pests and pathogens are not visible to the naked eye. It is therefore likely only a matter of time before further pests will enter this country undetected. Case in point is the recent discovery (not for the first time) of the Oak processionary

moth, notably discovered by the public. ITGA welcomed the establishment of the Pest Risk Analysis Unit (PRAU). There is now an urgent need to progress an Implementation Plan and to formalise Emergency Response Planning and Biosecurity procedures and communicate this to the forestry and growing sector to mitigate the risks of further damaging forest pathogens entering and spreading within Ireland.

The Irish Timber Growers Association (ITGA) through its work and various information and representation initiatives is committed to supporting the forestry sector and its critical role in the sustainable economic, environmental and social development of rural Ireland. ITGA is actively supporting and promoting forestry's contribution to the State and recognises the significant importance of developing and implementing a comprehensive and robust National Forest Strategy that underpins our new Forestry Programme, our Climate Action Plan and National Biodiversity Action Plan amongst others. To achieve these aims, ITGA calls for considerably improved support schemes for landowners impacted by Ash Dieback as outlined above.