



# IRISH TIMBER GROWERS ASSOCIATION

17 Castle Street, Dalkey, Co. Dublin, A96 AH57  
Tel: +353-1-2350520 Fax: +353-1-2350416  
Email: [info@itga.ie](mailto:info@itga.ie)  
[www.itga.ie](http://www.itga.ie)

## **Irish Timber Growers Association submission on Ireland's draft Forest Strategy And draft Forest Strategy Implementation Plan**

28-11-22

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.

The Irish Timber Growers Association welcomes the opportunity to make this submission to the Department of Agriculture, Food and the Marine on Ireland's draft Forest Strategy and the draft Forest Strategy Implementation Plan.

ITGA also welcomes the recent announcement by the Minister in relation to the proposed investment of €1.3 billion in Irish forestry through the National Forestry Programme. The importance of planting forests to mitigate climate change is well acknowledged and the new programme must assist in achieving this aim. Ongoing and additional supports for existing forest owners are also critical in ensuring we maximise the benefits, including the many ecosystem services, from our current woodland resource.

The proposed new grant and premium rates for forest creation and agroforestry are positive. Forest creation and agroforestry are the first two measures in the programme, but it is vital that the further six proposed interventions are similarly well funded to maximise the benefits from our existing forest estate. These are particularly important for forest owners given recent disease outbreaks, in addition to ongoing pest, windblow and fire risks.

The new programme encourages species diversity and biodiversity in line with EU Forest Strategy. The EU Strategy also places a strong emphasis on forest ecosystem services and seeks to develop, among other things, financial incentives, for the provision of ecosystem services. These provide important benefits to the wider population such as carbon sequestering and storing, improving biodiversity of flora and fauna, enhancing water and air quality and include health benefits of our woodlands. The EU Strategy acknowledges that forest owners and managers need drivers and financial incentives to provide, "*ecosystem services through forest protection and restoration*". Such drivers and incentives also need to be fully addressed in the

new Forestry Programme. The initial announcement of increased premium payments is positive and will help support new entrants to afforestation, but our early tree planters and existing forest owners must be similarly supported, so as to maximise the benefits of our woodland resource.

Page 1 of the draft Forest Strategy Implementation Plan sets out how Ireland's ambitions to expand its forests and to increase its role in helping address the climate and biodiversity objectives at both National and EU level can be realised. Over the period of the next Forestry Programme, the Irish Timber Growers Association call for a higher level of ambition for our national afforestation target of above afforestation of 8,000ha per year as set out in the Climate Action Plan 2021. The Association endorse COFORD's recommendations and conclusion in their recent series of COFORD Statements on Climate Change Mitigation, that a greatly expanded afforestation programme, reaching some 16,000 ha per year over the coming three decades is necessary for Ireland to approach carbon neutrality in land use by mid-century in accordance with the Paris goals. *'Going beyond the timeframe of the Climate Action Plan, the greater the afforestation rate, the greater the projected sink in 2050. Extending the 8,000 ha/annum afforestation target out to 2050 would provide for a sink of 2.2 Mt CO<sub>2</sub>eq in 2050. Increasing the level of ambition to the policy aspiration in Forest products and people – a renewed vision, some 16,000 ha per annum up to 2050, could provide a sink of circa 4.8 Mt CO<sub>2</sub>eq.'* ITGA therefore call for the afforestation target to increase annually over the period of the next Forestry Programme from 8,000 ha in 2023 to 16,000 ha in 2027 and for this ambition to be reflected in Ireland's Forest Strategy and the Forest Strategy Implementation Plan.

Ensuring the economic sustainability of the new afforestation schemes under this new Forestry Programme is critical through encouraging the planting of forests with an appropriate balance of species which will not disadvantage the economic sustainability of farm holdings into the future. It is therefore important to ensure the longer-term economic sustainability of forests after premiums have finished, through the promotion of productive tree species. ITGA wish to highlight this important objective so as not to have future forest owners disenfranchised when the forest premiums end, and the economic sustainability of their crop is questioned. More afforestation is needed to realise our forestry vision and emphasising the economic aspects to a greater degree will help engage landowners.

Agroforestry can be an important vehicle to attract new entrants into the new Forestry Programme and has been identified in the draft Forest Strategy and the Forest Strategy Implementation Plan as an example of a farming practice that has positive effects on several environmental and climate impacts compared to agricultural land without trees. Agroforestry has also been cited as a means to increase sustainability and biodiversity at a farm level while allowing farming to continue on the same parcel of land. ITGA call for the option that where pre-approval for an agroforestry scheme is granted to a landowner, that the pre-approval is also granted for afforestation of the same lands expiring at the end of the Forestry Programme. In this regard, an arrangement could be examined that where a farmer subsequently decides to afforest some or all these pre-approved lands (which were initially planted with under agroforestry scheme through this programme) that they could do so, without losing past

premiums or grants that were paid out under the agroforestry scheme. This would facilitate and make the transition to afforestation easier for farmers who have previously opted for agroforestry, where they so decide.

ITGA has been consistent in making the case that woodland establishment and sustainable forest management should have the potential to be a future source of income for growers reflecting the ecosystem services and carbon sequestration benefits they provide. This is currently a reality in the UK through their Woodland Carbon Code. This provides reassurance about the carbon savings that companies can achieve by being associated with woodland projects.

According to the latest State of the Voluntary Carbon Markets (VCM) report from the Ecosystem Marketplace, the non-wood market grew in value, approaching \$2 billion in 2021. This represents a quadrupling of the market value over 2020. Irish woodland owners must be encouraged to provide ecosystem services for the public benefit and similarly be acknowledged and facilitated by being appropriately remunerated for the provision of such public goods.

The new Forestry Programme funding measures and interventions should therefore fully remunerate forest owners for the supply of the various public goods and ecosystem services provided by forests including, carbon sequestration, improved biodiversity, air quality, water quality, flood mitigation and prevention of erosion, and others. Additional payments will also be necessary to compensate applicants for the proposed increase in non-productive forestry areas allocated to biodiversity and additional unplanted areas, as a result of licencing conditions or policy decisions, as further outlined in further sections of this submission.

The ITGA initiative in calling for the development of a Forest Carbon Code or Standard that would facilitate the sale of Voluntary Carbon Offsets from private forests is important. This would allow forest owners to attract additional revenue from the corporate sector over and above the grants and premium available in the Forestry Programme itself. It would ensure that forestry is made a more financially attractive option for landowners. COFORD recently recommended in their series of COFORD Statements on Climate Change Mitigation that, *'It is timely to explore the issues around the potential introduction of a voluntary carbon code in Ireland.'* ITGA welcome the proposals in the draft Forest Strategy and the draft Forest Strategy Implementation Plan in this regard and highlight the necessity to progress this in tandem with the commencement of the next Forestry Programme.

ITGA maintain that the grant application process is over complexed, and it is important that the department of Agriculture, Food and the Marine simplify the application processes, Tree Felling Licence application procedures, and the costs and time involved for landowners/forest owners in applications for forestry licences and in engaging with the various schemes in the next Forestry Programme.

It is important that the next Forestry Programme is structured around specific support measures and interventions around a forest management quality assurance and planning system and as a support for achieving Forest Certification which is a market requirement.

Certain Tree Felling Licence terms and conditions introduced in recent years requiring rewilding or reseeded of areas, increased setbacks, increased unplanted areas after felling,

must be re-examined and where they continue to be required, appropriate compensation should be payable to forest owners for such loss of productive areas. Research should now be undertaken on the impact of the overall reduction in the carbon sequestered due to the reduced tree stocking in reforestation areas due to such requirements in light of the recent series of COFORD Statements on Forests and Climate Change Mitigation which states, *'Any loosening of the replanting obligations following clearfelling carries a risk of creating further deforestation and of potentially reducing the sink amounts to well below those indicated over the period 2021-2030.'*

**With regards to Section 6, Strategic Enablers (P. 31 and P.32) of Ireland's draft Forest Strategy (2022-2030), ITGA would like to draw the attention to the following statements;**

**RE: 1. *New Organisational Arrangements*** – *Establish new organisational arrangements to facilitate ongoing monitoring, reporting and implementation of the new Forest Strategy (2022-2030).*

The establishment of an independent and autonomous national Forest Council or national body to have responsibility for the monitoring and implementation of the new Forest Strategy and Implementation Plan is critical to its future success. This is in keeping with the Strategic Action (9.1) in the Ireland's current Forest Policy, *'Forest, Products and people – Ireland's forest policy – a renewed vision'* (2014). The establishment of a Forest Council, representative of the forest and related sectors, with a permanent secretariat and executive, which would have responsibility for ongoing monitoring, implementation and reporting on the Implementation Plan would be core to achieving sector buy in and joint responsibility in achieving the Forestry Programme's aims and objectives. Ensuring long term cross sector input and engagement in implementation of Forest Strategy goals and providing flexibility in responding to emerging issues and opportunities would be a gamechanger for the sector and the new Programme.

**RE: 2. *Effective Communication*** – *Building on the learning outcomes of Project Woodland public consultation and engagement will continue to be an important tool used to improve transparency, efficiency and effectiveness of regulation and in policy decision making.*

ITGA as a leading organisation is in a position to support this measure into the future by continuing to promote forestry in Ireland and will bring its experience and practical knowledge and continue its strong record of providing valuable education and information services to growers and the sector.

**RE: 3. *Regulatory and Legislative Processes*** – *Establish an efficient and effective regulatory and legislative system and support structure for forestry management practices and grant aided forestry schemes.*

Planting progress will depend on momentum, ease of application and confidence in the system. Difficulties with the application and licensing system need to be resolved to restore this momentum and rebuild confidence. The current system must be improved. DAFM's Forestry Licensing Dashboard figures show that current licensing targets are not being met. Willingness to amend as necessary the existing regulatory, legislative and administrative system to ensure

it is efficient, effective and fit for purpose to achieve the targets in the next Forestry Programme is critical.

Also, Section 32 of the Forestry Act 2014 entitled '*Compensation for refusal of felling licence, etc*' which was drafted in the Act to address payment of compensation to a person where an application by the person is refused for a licence to - (a) to fell or otherwise remove trees, (b) to undertake forest road works, or (c) to undertake afforestation. As an assurance for forest owners, the drafting of the required regulations providing for the payment by the Minister of compensation as included in Section 32 of the Forestry Act 2014 should now be prioritised. This Section of the Act is also important in light of the EU Forest Strategy, which places emphasis on drivers and financial incentives for the provision of ecosystem services. The EU Report on NATURA 2000 Case Studies (2015) shows that many EU countries provide direct compensation for income foregone to forest owners, where the designations of forest habitats result in restricted timber production. Section 32 of the Forestry Act 2014 was designed for this purpose and should be prioritised.

The vision statement in Ireland's draft Forest Strategy is positive but could be strengthened. Reference to legacy issues (From Appendix I, Text of the national shared vision, Page 43, '*... Legacy environmental issues associated with past forestry practices are being successfully addressed...*'), is not appropriate in the context of a future vision.

Action 5 of Ireland's draft Forest Strategy Implementation Plan (Page 6) should be prioritised: '*Identify timings for commencement of the individual Forest Action Plan actions including implementation vehicles for non-forestry programme measures.*'

This action is time critical for the success of the new Forestry Programme and as highlighted in the draft Plan, '*Identifying the specific implementation pathways, funding mechanisms and timings for these Non-Forestry Programme Actions is an action in itself and will be a key early deliverable under the Forest Strategy.*' This Action should be prioritised and developed in tandem with the introduction of the new Forestry Programme in early 2023.

The Irish Timber Growers Association is committed to supporting promotion and awareness initiatives that deepen the understanding and cultural acceptance of forestry and the above points will help address some of the important concerns of the association. As with the Department, ITGA acts to foster co-operation between landowners, to encourage and support the creation of new forests and the management of existing ones, and empower, inform and equip forest owners, farmers and other landowners and businesses to make informed decisions about forestry and the association will continue to play its part in achieving the aims outlined in the draft Forest Strategy and the draft Forest Strategy Implementation Plan.

The Irish Timber Growers Association (ITGA) through its work and various information and representation initiatives is committed to supporting the sector and its critical role in the sustainable economic, environmental and social development. ITGA is actively supporting and promoting forestry's contribution to the State and recognises the significant importance of progressing a comprehensive and robust Forest Strategy and related Implementation Plan that drives our national Forestry Programme. ITGA will bring its experience and practical knowledge and continue its strong record of providing valuable education and information services to growers and the sector.