



IRISH TIMBER GROWERS ASSOCIATION

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Joint Irish Timber Growers Association / PEFC Ireland submission on Review of NPWS 2021

27th May 2021

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.

PEFC Ireland is the National Governing Body of the PEFC Council in Ireland. Formed in 2008, PEFC Ireland administers the PEFC Council's schemes and initiatives in Ireland, and promotes sustainable forest management and the use of credibly certified timber and wood-based products. Two thirds of the global certified forest area is certified as being sustainably managed in accordance with PEFC-endorsed national certification standards. Nearly 30% of all industrial roundwood worldwide is now sourced from certified forests.

Currently certification to PEFC, FSC, or both, standards is the only globally recognised method of ensuring that the wood and wood based products we consume originate in responsibly and sustainably managed forests. This is important given that wood and wood based products have been, and continue to be, fundamental to mankind's survival, not to mention development. No other material has shaped human history to the extent that wood has. Current FAO forecasts predict that global demand for wood fibre will treble between now and 2050, therefore the pressures on the world's forests are set to increase considerably.

The Irish Timber Growers Association and PEFC Ireland welcome the opportunity to make this submission to the Chair of the NPWS Review, Professor Jane Stout, and the Deputy Chair, Dr Mícheál Ó Cinnéide.

This submission will focus on the role of NPWS in engaging with woodland owners on afforestation and forest management in designated areas in general and particularly in relation to forest certification within a workable timeframe.

NPWS' Role in Engaging with the Forest Sector

Approximately half of the Irish forest estate is made up of private forests, the majority of which were planted in the past three decades. Some 70% of these private forests were established through Department of Agriculture, Food and the Marine (DAFM) forest grant aid, involving an approval process which included pre-inspections by DAFM forestry inspectors and then subsequent follow up inspections prior to receiving the final instalments of these grants. Most of the private woodland owners are small woodland owners (the average private grant-aided forest is 8.6 Ha. See DAFM Forestry Statistics Ireland 2020), mainly farmers, who make up the local communities, referred to in the Terms of Reference of the NPWS Review:

“To conserve, protect, manage and present our built and natural heritage for its intrinsic value and as an inspiration to creativity and environmental appreciation as well as a support to local communities, regional economic development and sustainable employment.”

The private forest estate contributes to the local, regional and national economy. According to DAFM statistics, farmers account for 81% of private forests established between 1980 and 2019. While half of the forest land in Ireland is owned by one owner, Coillte, the other half is in private ownership and made up of over 23,000 individual owners.

The fact that forestry in Ireland has expanded to the current forest cover of 11% is thanks to these often small woodland owners, who are now the custodians of half of the Irish forest estate.

Despite forestry's contribution to biodiversity, flood control, air quality, wellness and particularly climate change mitigation, woodland owners do not receive remuneration for supplying these public goods to society.

There is a misperception that these private forests are not practicing sustainable forest management and are not protecting the environment or contributing to biodiversity. Research has shown otherwise, as is outlined in the COFORD Forestry 2030 Paper ‘Irish Forests and Biodiversity’¹, ‘*In Ireland, plantation forests have been established to replace the native forests that were cleared over the centuries. Plantation forests compare favourably with many other intensive land-uses in terms of the biodiversity they support, especially when they replace degraded forest or when they are established on deforested land.*’ Also, ‘*Forest management plans afford us the opportunity to enhance biodiversity in our forests.*’

‘Afforestation allows for forest expansion, and plantations contribute to biodiversity within landscapes through habitat supplementation or complementation, connectivity and buffering effects. Plantations can maintain or create wildlife corridors enhancing connectivity between areas of native ecosystems. Even relatively small forest fragments facilitate biodiversity conservation in human-dominated environments.’

The DAFM IFORIS Internet system, used by registered foresters in Ireland as a forest management planning tool, contains mapping layers, including NPWS referral layers. There is an expectation that when a forest, located in one of these referral areas, requires active sustainable forest management, this is done in agreement with NPWS. This is generally through the DAFM licencing systems that requires submission of detailed Forest Management Plans

1

<http://www.coford.ie/media/coford/content/publications/forestry2030/00504%20Forestry%202030%20Inserts%20-%2006%20Bio%20Diversity.pdf>

and maps which are referred to NPWS as part of the licencing process. Active and timely engagement of NPWS with this licencing process is therefore crucial.

Sustainable Forest Management needs to be undertaken within a national and European legal and environmental framework and forest owners and forest managers take this responsibility seriously in their forest management planning to ensure that forest operations have no negative impact on protected species, water quality, biodiversity and the environment in general.

NPWS has an important role to play in engaging with the private forestry sector to ensure that these private woodlands are managed in a way that contributes to the sector's environmental, social and economic sustainability.

In a recent presentation to Nature Unit of DG Environment of the European Commission, ITGA reiterated that there is now an urgent need for improved interaction and communication by NPWS with Woodland Owners and the Sector.

The Role of NPWS in relation to Forest Certification

In the last decade or so, two international Forest Certification Schemes, PEFC and FSC, have become more established in Ireland.

Almost 450,000 Ha of forestry in Ireland is currently certified to either, or both, of these standards.

Forest Certification is a voluntary process whereby a forest owner decides to submit their forest to be audited by an independent accredited certification body against an agreed forest management standard. PEFC and FSC are both recognised international forest certification standards, which specify compliance of forest management with a range of principles, including legal requirements, social and environmental safeguards, high conservation values, health & safety, workers' rights, etc.

Two national forest certification standards were drafted and endorsed in 2011 and 2012, respectively:

- PEFC Irish Forest Certification Standard (Endorsed 2011 and Revised 2014)
http://pefc.ie/wp-content/uploads/2018/03/IFCS_2nd_edition_Jan_2014.pdf
- FSC Irish Forest Stewardship Standard
FSC-STD-IRL-012012- Irish Forest Stewardship Standard-EN
<https://fsc.org/en/document-centre/documents/resource/360>

Both of the above certification standards have assigned a critical role to NPWS, as the Statutory Agency, to engage with forest owners, wishing to achieve international forest certification, on the management of certified forests in designated areas, through the licencing process as outlined previously or directly where required.

The below Requirement 6.1.1. is an example of the requirement for ‘*Documented evidence of consultation with statutory agencies*’ taken from the current PEFC Irish Forest Certification Standard.

<p>6.1.1 Requirement National Parks and statutorily designated areas shall be identified and mapped. Management in the form of notifiable actions shall be agreed in consultation with the relevant statutory agency.</p>	<p>Guidance Statutorily designated areas include established and proposed</p> <ul style="list-style-type: none"> • Special Areas of Conservation (SACs) • Special Protection Areas (SPAs) • Natural Heritage Areas (NHAs) • Nature Reserves
<p>Means of Verification</p> <ul style="list-style-type: none"> • Maps showing designated areas • Management Plans • Field Inspection • Documented evidence of consultation with statutory agencies 	<p>Notifiable Actions are certain activities or operations In Designated Areas that might be damaging. Notifiable Actions can only be carried out with the permission of the Minister for the Environment, Heritage and Local Government. These vary depending on the type of habitat that is present on the site. Such activities or operations are not prohibited but require the landowner/occupier to consult (in practice with the local Conservation Ranger) in advance. Notifiable Actions do not apply where a licence or permission is needed from a planning authority (e.g. planning permission) or another Minister (e.g. a felling licence or afforestation approval)</p>

There are similar references in Requirement 2.1.3; 3.1.1 and 5.1.7 of the PEFC Irish Forest Certification Standard.

The FSC Ireland Standard has similar requirements, such as Indicator 6.2.4 below, where references are made to NPWS’ role as nature conservation authority.

<p>Indicator 6.2.4 Areas designated as, or adjacent to, Special Areas for Conservation, Special Protection Areas, Ramsar Sites, Nature Reserves and/or proposed/Natural Heritage Areas shall be managed in accordance with plans agreed with nature conservation authorities, and these shall be marked on the habitat map (6.1.1) and all operational maps.</p>

An auditor seeking verification of compliance with the standard, will therefore be looking for evidence of engagement with NPWS on the forest management of forests that are within or in close proximity of a designated area, through the licencing process as outlined previously or directly where required.

NPWS Responsibility in designation of conservation sites & certification implications

In 1995, NPWS published 630 proposed NHAs or pNHAs, as referenced on their website:

<p><i>In addition, there are 630 proposed NHAs (pNHAs), which were published on a non-statutory basis in 1995, but have not since been statutorily proposed or designated. These sites are of significance for wildlife and habitats. Some of the pNHAs are tiny, such as a roosting place for rare bats. Others are large - a woodland or a lake, for example. The pNHAs cover approximately 65,000ha and designation will proceed on a phased basis over the coming years.</i></p> <p><i>Prior to statutory designation, pNHAs are subject to limited protection...</i></p>

The FSC Ireland Standard makes references to these areas that were given pNHA status, as follows:

Proposed NHA (pNHA) sites and Annex 1 habitats (Habitats Directive) occurring outside of designated areas shall also be considered HCVF ♦.

(♦ Once the NHA process has been completed for woodland areas, the completed list of NHA woodland sites will be included as HCV3.)

The majority of these pNHAs sites still have the ‘proposed’ status, few have since been upgraded to designated status. The non-statutory element and the limited protection of the pNHA designation, as defined by NPWS, suggests that the conservation value of these forests has yet to be determined. By engaging with the review of national certification standards (see below), NPWS could clarify such matters to the sector.

Challenges as outlined in the Mackinnon Report in relation to NPWS

ITGA would also like to raise the point that, in relation to NPWS, the DAFM commissioned 2019 Mackinnon Report, *Review of Approval Processes for Afforestation in Ireland*, identified a number of significant challenges for the forestry sector and the aforementioned forestry licencing process.

Specifically, some of the recommendations of this report include;

- Revise MOUs with NPWS and NMS.
- Ensure all State Bodies play their part in implementing the Strategy.

In relation to NPWS, the above referenced Mackinnon Report, *Review of Approval Processes for Afforestation in Ireland*, in section 59, states:

‘Clear guidance should be developed as a priority and as the joint responsibility of the Department, NPWS and the Department of Communications, Climate Action and Environment as many participants in the Review perceived tensions between increasing the area of woodland to help address the challenges of climate change and the protection of habitats and species.’

In section 60, the report continues:

‘The consultation process with PBs must be streamlined. It is not clear why NPWS should be given twice as long to respond as other Bodies. These timescales for PB consultation should be aligned. There are Memoranda of Understanding/Protocols with NPW (2012) and NMS (2004) in relation to referrals. These should be revised and updated by end March 2020 with a view to streamlining current processes. Consultation with the other Bodies should be reviewed thereafter with priority given to the arrangements with those local authorities with the highest workload responding to licensing applications.’

NPWS' Role in Forest Certification Standard Setting and Standard Revision

International Forest Certification standards are regularly revised and updated and a periodic review is therefore required of the national standards, which are based on these international standards. Both the PEFC and FSC Irish forest certification standards are currently being, or due to be, reviewed.

The review of the PEFC Irish Forest Certification Standard is currently underway and a Technical Working Group (TWG) comprising of representatives of various stakeholder groups are currently in the process of finalising a draft revised standard to go to Public Consultation later this Summer.

NPWS was invited to participate in this revision process and to date no response has been received from NPWS in this regard, which constrains the process, given the crucial role assigned to NPWS in both standards. It is hoped that NPWS will participate in the upcoming stakeholder consultation of the Revised PEFC Irish Forest Certification Standard when this gets underway.

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 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 national Climate change and Biodiversity aims.