IRISH TIMBER GROWERS ASSOCIATION

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Irish Timber Growers Association (ITGA) submission on the

Draft Contingency Plan for *Ips typographus* (Eight-toothed Spruce Bark Beetle)

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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, native woodland owners, 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 Association welcomes the opportunity to make this submission to the Department of Agriculture, Food and the Marine.

1. Introduction

This submission is made in response to the draft *Ips typographus* Contingency Plan (December 2025) and focuses on the implications of the proposed measures for private forest owners, who account for over half of Ireland's forest estate.

The Irish Timber Growers Association fully acknowledge the serious potential impact and phytosanitary threat posed by *Ips typographus* and support the Department's objectives of preventing its establishment and spread. However, experience from comparable outbreaks and contingency responses in other jurisdictions demonstrates that eradication success is highly dependent on early reporting, owner cooperation, and economic proportionality. Several aspects of the draft plan raise concerns in this regard.

2. Financial Liability and Compensation

The draft plan places potentially extensive legal and operational obligations on forest owners, including felling, destruction, transport, biosecurity measures, and withdrawal of timber from the market. However, the plan does not clearly specify how the costs of these mandatory actions will be met.

While reference is made to the Forestry Programme providing "scope" for support, (Page 13; *'The Department's Forestry Programme provides scope for the provision of support to forest owners, whose plantations have been impacted by biotic and abiotic factors.')* this is discretionary and lacks detail on:

- Eligibility.
- Compensation or reimbursement rates.
- Coverage of indirect losses (e.g. market withdrawal, contract breaches).
- Timing and extent of payments.

Recommendation that should be reflected in the Contingency Plan for *Ips typographus*:
- The contingency plan should explicitly:

- Clarify the principle of cost reimbursement by the State for forest owners.
- Commit to compensation mechanisms where statutory actions remove or destroy merchantable timber (current of future production).
- Provide assurance that compliance with official directions will not result in uncompensated financial loss to forest owners.

3. Scale and Duration of Demarcated Areas

The proposal to establish an initial 50 km demarcated area following confirmation of a finding is a matter of particular concern.

Such a large radius has the potential to:

- Encompass significant areas of uninfected private forests.
- Restrict timber movement and harvesting across wide regions.
- Disrupt supply chains.

It is noted that, '*Subsequently, and pending the results of investigations within this area, an infested zone, and a buffer zone will be established, this will be the official Demarcated Area.*' The maximum length of time for these investigations and the parameters for the size of the buffer zones should be clearly stated in this plan and also be subsequently determined through dialogue with forest owners in the area. Also, the requirement that demarcated areas remain in place for three years following the last detection further compounds the long-term economic risk for owners of such a large demarcated area (Page 14: *'the pest concerned has not been found to be present in that demarcated area for a sufficiently long period [3 years]'*).

Recommendation:

- The plan should include risk-based criteria for adjusting demarcated areas as surveillance data becomes available.

- Provision should be made for phased reduction of restrictions where evidence supports it.
- The economic impacts of prolonged demarcation should be explicitly considered and compensated/reimbursed for.

4. Operational Practicality of Eradication Measures

The default eradication measures outlined—on-site burning or chipping and transport to approved destruction facilities—may not be economically feasible in many private forest settings due to:

- Environmental or safety restrictions on burning.
- Limited access to suitable machinery or contractors.
- Distance to approved facilities and associated costs.

Without **flexibility**, these requirements may unintentionally discourage early reporting.

Recommendation:
The plan should:

- Provide a wider range of approved treatment and processing options.
- Ensure adequate national capacity for treatment and disposal with full compensation for forest owners.
- Allow site-specific, risk-based decisions to be agreed with owners.

5. Legal Certainty and Proportionality

The plan requires forest owners to act "immediately" (see page 12) in accordance with Departmental directions, but does not outline:

- How directions will be issued and confirmed in writing.
- What appeal or review mechanisms exist.
- How proportionality will be assessed for small-scale or lower risk holdings.
- Who will pay for where, '*Forest Owners and Professional operators will act in accordance with the direction of the Department to eradicate the pest, prevent its further spread, and provide the information necessary to conduct trace forward/back investigations.'*

Recommendation:

- Clear procedural safeguards should be included.
- Owners should receive written instructions with defined timelines.

- Proportionality, flexibility and feasibility should be explicit guiding principles.
- It must be acknowledged, and appropriate flexibility shown, for some forests that may be subject to legal constraints, probate and or other legal or practical difficulties constraining forest owners from acting “immediately” in accordance with Departmental directions.
- Full reimbursement/compensation must be made to forest owners who receive such direction from the Department.

6. Market and Contractual Impacts

Mandatory withdrawal of timber from the market and movement restrictions may expose forest owners to:

- Breach of existing contracts.
- Loss of market access and market value of roundwood.
- Significant price reductions.

These impacts are not addressed in the draft plan.

Recommendation:

- Significant reduction in market prices/values, and market disruption should be recognised as a material impact as significant timber catchments may be affected.
- Mitigation measures, including facilitated processing and full compensation/reimbursement for forest owners must be put in place.

7. Stakeholder Representation and Engagement

While communication mechanisms are outlined, private forest owners are not explicitly represented in decision-making structures such as the Co-ordination Group.

Recommendation:

- Formal inclusion of private forest owner representation should be central to a Co-ordination Group.
- Ongoing engagement with forest owners should extend beyond notification to genuine consultation on measures and impacts.

9. Conclusion

In conclusion, while the draft Contingency Plan is much improved, its effectiveness will ultimately depend on trust, cooperation, and economic realism at forest owner level.

Addressing the concerns outlined above are critical and would significantly strengthen the plan, improve compliance, and reduce the risk of unintended economic and behavioural consequences.

The Irish Timber Growers Association (ITGA) appreciate the opportunity to contribute to this consultation process and would welcome further engagement as the Contingency Plan is refined.