

## **Submission on the Rural Development Programme 2014-2020 Consultation Paper:**

We welcome the publication of the Forestry Programme 2014-2020 Consultation Paper and the opportunity to comment on it. It may be helpful for us to begin by outlining our starting assumptions, before setting out some general guidelines we feel should be followed and finally giving some responses to details of the proposals in the consultation.

### **Our starting point**

- We wish to see a farmed landscape which delivers a wide range of policy goals, including a range of public goods for which there is currently no properly functioning market. This farmed landscape should include trees, woods and forests. Multiple use for multiple outputs is both possible and desirable in many areas.
- The assumption that *all* forestry projects are ‘Green’ needs to be seriously re-examined, not least so that those forestry projects which are truly green and deliver large environmental benefit ‘bang’ for the public fund ‘buck’ can flourish. On the native woodland side, a landscape scale approach needs to be taken, which recognises the existing role of native trees, sees the potential for natural regeneration *in the context of other biodiversity issues* and recognises the limited benefits of planted native trees for biodiversity in the short to medium term perspective. Particular value must be placed on existing biodiversity, including semi-natural habitats, noting that EU priority habitats deserve appreciation in policy even outwith designated sites. This is not to say that all semi-natural habitats must be ‘protected’ from all afforestation – some less valuable site types may provide opportunities for innovative approaches to agroforestry using deciduous trees (which ‘rain’ fertiliser on poor pastures), as well as to the expansion of native woodlands by natural regeneration.
- While the stress on growth and jobs is laudable, it is a big mental leap to imply that any and all forestry activity is the optimum way to address this goal (or to do so in anything like a cost-efficient manner). Low yield plantations offer few jobs and little value added to taxpayers in return for their large investment. ‘Underpinning’ a rural economy through self-sustaining commercially-successful industries is one thing – choosing where to spend scarce tax money on ongoing subsidies is quite another. Forestry which is meant to be ‘commercial’ should be assisted to a position where it can better respond to the market, while internalising the costs of good environmental stewardship.
- While we believe that all parts of the landscape, including trees, woods and forests, should be managed in as sustainable a way as possible, we recognise also that some areas will produce higher levels of certain outputs and lower levels of others. Taking these together, this implies also that the balance between market and public goods and therefore market income and state support will vary from place to place. The consultation asks, ‘How well do the measures meet market needs?’ In some circumstances the most appropriate ‘market’ is for public goods – in such locations, ‘commercial’ plantations may not in fact meet any real market needs (apart from getting landowners grants and keeping contractors in work).
- We agree that there needs to be ‘Growth’ in rural areas. However, we call for there to be a better measure of this and a more meaningful aspiration than the number of applications for support and the area planted. In some areas afforestation is a ‘respectable’ version of

land abandonment, a sign of the further *weakening* of rural communities, not their strengthening.

- The role of regulation must not be understated. The implications of a regulatory context in which a commercial self-financing business is asked to ‘collaborate’ to deliver environmental sustainability and biodiversity, while far from negligible in the light of ‘polluter pays’ considerations, is nevertheless morally quite different from one where the shape of the regulated business and the pattern of which operations are ‘profitable’ and which are not are substantially determined by public funding. Most of Ireland’s woods and forests fall into the former category and the balance between support and regulation should ensure best value for the taxpayer.
- For biodiversity (and for a range of other public goods, from flood and soil erosion control to carbon sequestration), semi-natural vegetation (including woodland), managed at low intensity, is of paramount importance.

### **Comments on the framework for support**

- Irish forestry policy can deliver a range of benefits for both the economy and for wider public policy goals. But for wider policy goals to be efficiently and effectively delivered, it must be firmly placed within a broader land use strategy. This will mean as much having *more* encouragement for trees, woods and forests in some circumstances as having less in others, but all based on a meaningful assessment of current policy outcomes and future potential under a range of possible scenarios. Integrating public policy should be a task in the first instance for the public authorities.
- An integrated approach of this type means that controls, support payments, advice etc. work in harmony, not independently or even competitively as has tended to happen in the past. As an example, it is not appropriate that valuable wet grasslands producing high quality environmental goods but needing management cannot get meaningful agri-environment support, but can access large planting grants without the need for Environmental Impact Assessment. On the other hand it is wrong that farmers wanting to plant productive agro-forestry (e.g. grazed poplars) should be made to choose between agricultural and forestry support. All CAP and rural development payments must speak with one voice. We strongly urge that forbidding forestry planting in a particular location should be accompanied by a complementary encouragement or reward for an alternative management option. There must be better coordination of payment rates. Given this need it is very unclear why the new forestry measures are not to be included in the wider Rural Development Programme currently being prepared by the Department. This two pronged approach will only exacerbate the difficulty of coming up with a coherent, holistic and complementary measures to realise the overriding priority areas of the RDP.
- The value of semi-natural areas cannot be judged solely in terms of the current poor return from farming. But equally, the perception that only ‘rubbish’ is worthy of being ‘forestry land’- that some land ‘is only good enough for forestry’- must be changed, both to deliver a positive, successful woodland sector and a coherent land use message for farmers and other landowners. This is a task which only an integrated support framework can achieve. The indicative forest statement forest development suitability map for Ireland presented in the SEA forest policy review (<http://www.agriculture.gov.ie/forestservice/publicconsultation/noticeofpublicconsultation/forestpolicyreview/environmentalreport/>) may be a useful starting point for targeting at

a national level. However, this report goes onto indicate that forestry may still occur on semi-natural grasslands and heath. It must be noted that in these circumstances planting is likely to pose a significant threat to existing biodiversity. Proposals which involve a known loss of biodiversity must cross a much higher test if their approval is not to call into question the sustainability of the forestry strategy and is not to breach the minimum environmental standards as detailed in European Union Guidelines for State Aid in the agriculture and forestry sector.

- The integration of delivery actions should also reflect the more fundamental integration of policy objectives, including not only the conservation of existing biodiversity (which is our primary concern) but also climate change amelioration and adaptation and the protection of water quality and supply and the prevention of flooding and soil erosion. In relation to “European Union Guidelines for State Aid in the agriculture and forestry sector and in rural areas 2014 to 2020”, we wish to bring to the attention of DAFM section 2.1.1 paragraph 495 which states the minimum environmental standards that shall apply in the context of the afforestation and creation of woodland measure; “the selection of species to be planted, of areas and of methods to be used shall avoid the inappropriate afforestation of sensitive habitats such as peat lands and wetlands and negative effects on areas of high ecological value including areas under high natural value farming. On sites designated as Natura 2000 pursuant to the Habitats Directive and the Birds Directive only afforestation consistent with the management objectives of the sites concerned and agreed with the Member State's authority in charge of implementing Natura 2000 shall be allowed.” We repeat however that while there are legal obligations to be observed, this is primarily a question of truly integrating serious policy concerns into a coherent message for landholders.
- Integration should also be encouraged at the holding/woodland/applicant level. We welcome any process or mechanism by which the integration of various relevant actions can be achieved, the better to achieve the objectives set out in the Regulation and in national strategies. Beneficiaries should themselves be encouraged to design and realise integrated projects where possible. The implementation of this in practice will require clear guidance and improved knowledge transfer on existing and planned forestry land. It requires clear objectives and a long term plan for forestry areas at either national but preferably regional level. It must contribute to the implementation of the EU Forest Strategy “A new EU Forest Strategy for forests and the forest-based sector”.
- Intensive training and upskilling of the forest industry is required to identify existing areas of high ecological value. And to repeat, in such cases there must be an integrated approach within the wider RDP where land owners of such land are rewarded for keeping land in such high ecological value. Forestry measures together with inadequate support under the wider RDP must not see further loss of this dwindling resource.
- In the past there have been some examples of what would now be considered less than best practice. Awareness and technical developments have also moved on. The opportunities afforded by the RDP to improve both the environmental and commercial performance of existing woods and forests should be firmly grasped. Where sensitive catchments have already been afforested supports should be made available to optimise the timber production and/or delivery of public benefits on those land, including improved performance on water quality, flood control etc. aspects where best practice must evolve rapidly to meet WFD obligations.

## Specific Comments on Proposed Measures

### *Measure 1: Afforestation and Creation of Woodlands*

#### *Agro-forestry.*

We welcome the proposal for including an agroforestry measure and support its prioritisation under certain conditions. It not only reflects the EU vision for the sector, but offers considerable potential for improved delivery of multiple outcomes on a range of land types, not least the more productive areas hitherto largely untapped by the forestry sector. A well designed silvopastoral system could deliver multiple societal benefits both economically and environmentally.

The strategic goals of a sustainable and diverse forestry sector and non-food energy crops are worthy of support but should be integrated into the first two – growth and jobs must be sustainable in all senses; energy crops should be integrated into environmental sustainability and biodiversity considerations.

Thus while this proposed measure needs more detail, we are disappointed that such a potentially integrating concept seems to have been considered only in terms of certain types of highly productive stands – the promise extends much wider in our view. We find the proposed restrictions on planting density particularly rigid, given the range of possible systems which we can already see operating across Europe.

As the agro-forestry measure is being introduced on a pilot basis it must be accompanied by a well-designed monitoring and research programme. This is particularly important given the complexity of a multiuse system where the balance of at least two crops (wood and pasture) need to be balanced. Appropriate management of both components needs to be considered in order to maximise both economic and environmental returns in a sustainable production system.

The statement that it will thereafter be ‘forestry land’ needs to be further clarified in practice – synergies between agriculture and forestry activities and policies should be maximised, with no artificial barriers or choices imposed on the landowner based on the State’s imposition of artificial categories.

#### *Forestry for fibre*

We are concerned that this measure may not be lawful in the light of paragraph 494 of the European Union Guidelines for State Aid in the agriculture and forestry sector and in rural areas 2014 to 2020- “No aid shall be granted for the planting of trees for short rotation coppicing, Christmas trees or fast growing trees for energy production.”

### *Measure 2: Investments in Infrastructure: Forest Road Scheme*

We are unclear why a commercial forestry sector and commercial plantations designed to boost the growth and efficiency of Ireland’s economy at a time of scarce public resources should need assistance with basic infrastructure, safeguards and remedial actions which should have been costed into the forward plans of any good business. These should not be priorities for public spending.

### *Measure 3: Prevention and Restoration of Damage to Forests: - Reconstitution Scheme*

No comment.

*Measure 4: Investments improving the Resilience and Environmental value of Forestry: - NeighbourWood Scheme*

No comment.

*Measure 5: Investments improving the Resilience and Environmental value of Forestry:- Woodland Improvement (Thinning and Tending- Broadleaves)*

Some of the examples used raise concerns in our minds as to the depth of true integration of environmental issues into forestry practice which this measure is, ironically, meant to promote, e.g. brashing to improve access for manual application of fertiliser. If aerial fertilisation not possible overriding sensitivity of site raises questions as to whether the site should be fertilised at all and even as to whether it should have been planted in first place. The option of releasing portions of sites or even whole sites from afforestation for overwhelming environmental reasons should not be forgotten – it is essential in some cases. Once more, there should be no public funding of what a reasonable business should have planned to do. Non-market operations, going beyond ‘polluter pays’ and with wider public benefit should however be considered for support. If this measure wishes to improve the environmental value of forests it should aim to tackle some of the environmental issues with past planting. It should improve the environmental performance and overall sustainability of existing plantations. Actions to include under this measure could include for example restoration of forested peatland (restoring peatland systems where forestry has failed); buffer zone management in sensitive area and on peatlands to manage risks to water and aquatic ecosystems.

*Measure 6: Investments improving the Resilience and environmental value of Forests:- Native Woodland Scheme*

We support the continuation of this measure but as part of targeted land use policy integrated into wider RDP and compatible with environmental objectives of Habitats, Birds and Water Framework Directives. A landscape scale approach needs to be taken, which recognises the existing role of native trees, sees the potential for natural regeneration in the context of other biodiversity issues and recognises the limited benefits of planted native trees for biodiversity in the short to medium term perspective. Particular value must be placed on existing biodiversity, including semi-natural habitats, noting that EU priority habitats deserve appreciation in policy even outwith designated sites. This is not to say that all semi-natural habitats must be ‘protected’ from all afforestation – some less valuable site types may provide opportunities for innovative approaches to agroforestry using deciduous trees (which ‘rain’ fertiliser on poor pastures), as well as to the expansion of native woodlands by natural regeneration.

*Measure 7: Knowledge transfer and information actions*

We firmly support this measure, which is essential to ensure the dissemination of best practice and thereby to deliver a forestry sector and woodland management which is both more environmentally and economically sustainable. Other than in exceptional cases, currently afforested land will remain under trees and should perform at its best for the landowner and the nation. A lot of effort should be made to optimise timber production and/or delivery of public benefits on those land, including improved performance on aspects such as water quality, flood control, where best practice must evolve rapidly to meet WFD obligations, for example.

The forestry programme can indeed be ‘Smart’ – there is plenty of room for incorporating and further developing best practice, not only to maximise the delivery of positive outcomes, but also to minimise negative impacts. This should be a priority for public spending.

*Measure 8: Setting up of Producer Groups*

We support measure as a small component of the overall programme.

*Measure 9: Investments in Forestry Technology*

We are not clear why scarce public resources should be spent on what should be a part of normal business practice.

*Measure 10: Forest Environment and Climate Services: - Forest Genetic Reproductive Material*

In the case of ‘commercial’ species, we are not clear why scarce public resources should be spent on what should be a part of normal business practice.

*Measure 11: Forest management plans*

These should be an obligatory prerequisite for claiming any Government support and for getting permission for any works with wider impact on e.g. river quality, landscape. All new forestry and all restocking should need a management plan. Planning for non-commercial positive work for biodiversity, landscape etc to bring pre-existing forests up to current good practice standards should still be grant-aidable for some time – funding should be limited to these areas, but given some priority.

**Signatories to this Submission:**

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