



Mr Karl Coggins  
Assistant Principal  
Forest Service Policy Section  
Forest Service  
Department of Agriculture, Food and the Marine  
Johnstown Castle  
Wexford

13<sup>th</sup> October 2014

Our Ref: SCP140503.2

**Re. Draft Forestry Programme 2014-2020: Ireland and Strategic Environmental Assessment Environmental Report**

Dear Mr Coggins,

The EPA acknowledges your notification, dated 10<sup>th</sup> September 2014, on the Draft Forestry Programme, the Programme, and the associated SEA Environmental Report (ER) and welcomes the opportunity to make a submission. This submission focusses primarily on the integration of environmental considerations into the Forestry Programme.

You are referred to the following previous EPA submissions to your Department relating to forestry:

- SEA scoping submission - 23<sup>rd</sup> May 2014
- Submission on the Draft Forest Programme –Summary of Proposed Measures 2014 - 2020 - 14<sup>th</sup> May 2014
- Submission on the Draft Forest Policy Review - 23<sup>rd</sup> August 2013

The key aspects of these submissions, attached, some of which are reiterated below, should also be taken into account in finalising the Programme. You are in particular referred to the recommendations and suggestions on the proposed Measures in our previous submission on the *Draft Forestry programme- Summary of Proposed Measures 2014-2020*.

*Overall observations*

The EPA recognises the potential role that forestry has in Ireland's economic recovery along with the range of associated ecosystem services forestry can provide. The realisation of a significant increase in national targets for forest cover to up to 18% of land area from an existing 11% has, however, the potential to result in conflicts with Ireland's commitments to achieving and maintaining a good quality environment in accordance with EU Directives.

The Programme should provide for a high level of protection of the environment and promote environmentally sustainable development and management of forestry. This will be achieved by fully integrating environmental considerations in finalising and subsequent implementation of the Programme. This is particularly relevant for Measures 1: Afforestation and Creation of Woodlands and its associated schemes. It is also relevant for Measure 2 –Neighbourhood Wood Scheme, Measure 3- Forest Roads, Measure 4 - Reconstitution Scheme, Measure 5 - Woodland Improvement (Thinning and Tending), Measure 6 - Native Woodland Conservation Scheme, Measure 7 - Knowledge Transfer and Innovation Actions, Measure 11 - Forest Management Plans.

It should be ensured that, the proposed forestry measures are compatible with existing EU and national environmental objectives and that there are no negative environmental impacts resulting from the implementation of the Programme. In particular, it will be necessary to

ensure existing and proposed forestry does not impact on the achievement of Ireland's obligations under the Water Framework Directive (WFD) and the Habitats Directive. In this regards, the Programme should clearly reflect the Mitigation and Enhancement Measures in *Section 7 – Mitigation and Enhancement* of the SEA Environmental Report and in *Section 6 – Mitigation* of the Appropriate Assessment Natura Impact Statement.

High status waters should, in particular, be afforded adequate and appropriate protection. Specific measures to ensure high status water bodies are not compromised should be included in the Programme. Relevant monitoring should be implemented in association with the relevant authorities to ensure this is the case. In catchments where existing forestry developments may impact high or good status sites, tighter controls may be needed on clear-felling and harvesting.

Opportunities to encourage retrospective fitting of measures to mitigate impacts from sedimentation and nutrient run-off from clear-felling should be clearly identified and be reflected in the proposed forest measures. This may be assisted by reference to the HYDROFOR project outputs and findings and other relevant research projects. Additional aspects which the Programme will need to consider in the context of potential water quality impacts include the potential for commercial forestry to impact on water quality, especially in upland areas. These areas are often prone to soil erosion and have a low capacity to buffer against acidification. The potential for high quantities of sediment loads to arise from catchment disturbance associated with forestry needs to be considered when assessing any applications under measures 1, 2 3, 5 and 6. The EPA emphasises the need to avoid planting environmentally sensitive land in the absence of suitable forestry management and mitigating measures.

The Programme should promote opportunities for enhancing the protection of high and good status sites through promotion and support for riparian buffer strips, utilising existing mechanisms, and for integrating new forest areas within the landscape with the goal to attenuate nutrient mobility. In the context of the 'NeighbourWood Scheme' measure, priority should be given to proposals which provide an additional benefit of enhancing the protection of waterbodies and watercourses adjacent to the proposed planting. Guidance of the most suitable location for NeighbourWoods should be provided to applicants considering this measure.

The implications of land use conversion associated with the proposed scale of forest expansion should be considered. The dynamics of carbon stocks during land use change, which may act to negate a significant proportion of the potential carbon sequestration once the forest has been established, should be addressed. There is also need to consider the availability of suitable lands for afforestation.

Further consideration of the possible impacts on the landscape arising from the proposed increase in total forest area is required. The impact of the Programme on spatial pattern of afforestation needs to be elaborated on more fully. The historic pattern of afforestation has produced fragmented plantation patterns. The Programme should take into account the Draft National Landscape Strategy (DAHG, 2014),

*Section 2 – Strategic Context of the Forestry Programme* outlines the relationship between the Programme and relevant EU and national policy. The links in *Section 2.2 - EU Policy Framework* between the relevant aspects of the Programme and *Europe 2020* are noted. The requirements under the WFD, Habitats Directive and Climate change mitigation should also be reflected under national Policy. Of particular relevance is *Section 2.2.7* on NATURA 2000 and Water Framework Directive. In implementing the Programme, it should be ensured that

Ireland's obligations in relation to the EU Habitats Directive and the Water Framework Directive are not compromised.

#### *Potential Additional Measure*

There would be merits in including a specific Measure promoting relevant Forestry related research. The European FP7 research and innovation programme includes a range of priorities in relation to agriculture including forestry. In particular it includes:

1. Fostering knowledge transfer and innovation in agriculture, forestry and rural areas.
2. Enhancing farm viability and competitiveness of all types of agriculture in all regions and promoting innovative farm technologies and sustainable development of forests.
3. Restoring, preserving and enhancing ecosystems related to agriculture and forestry.
4. Promoting resource efficiency and supporting the shift towards a low carbon and climate resilient economy in agriculture, food and forestry sectors.

EPA would welcome an appropriate emphasis be placed on the funding of projects that shift behaviour towards priorities 3 and 4.

#### *Measure 10 – Forest Environment and Climate Services*

The details relating to *Measure 10 – Forest Environment and Climate Services* should be reviewed in relation to the inclusion of specific aspects relating to *Forest Environment and Climate Services*. There would be merits in considering including a separate Measure dealing specifically with this aspect.

#### *Catchment Forest Plans*

It is recommended that a commitment is included in the Programme to prepare a series of appropriately scaled catchment based Forest Plans which will capture the Forestry Life Cycle—including planting, felling and replanting. These plans should be spatially relevant and should be prepared in accordance with the requirements of the SEA and Habitats Directives.

#### *Integration of SEA, AA and Programme Development*

The Programme should clearly reflect the outputs from the SEA and Appropriate Assessment processes. The final Programme should include a specific section which clearly recognises and outlines the interaction with, and the influence of, the parallel SEA and Appropriate Assessment processes in the development of the Programme. In particular, the Key Mitigation Measures and Recommendations proposed in *Section 7 – Mitigation and Recommendations* of the SEA Environmental Report (ER) should be reflected in the Programme.

#### *Implementation and Monitoring*

In implementing the Programme Measures, provisions will need to be put in place for relevant environmental monitoring and associated reporting on the environmental outcome of the implementation of the measures. This should be developed and agreed with the relevant statutory environmental authorities. The relevant environmental commitments at the EU and national level should be reflected in implementing the Programme Measures and in monitoring and reporting on the achievement of the Measure specific objectives. The proposed Monitoring Measures in Table 7.1 should be reviewed and suitable Indicators and Targets assigned against the specific SEA objectives.

A set of outcome-based indicators should be developed to assist in overall monitoring of the implementation of the Forestry Programme. These could be used to demonstrate linkages between investment through the Programme and positive environmental outcomes in areas including water quality, resource efficiency and climate resilience. These Indicators should be linked with relevant SEA related environmental monitoring



A commitment to environmental monitoring, and reporting on the results of monitoring, should be included in the Programme

There would be merits in considering preparing an Implementation Plan(s) which will provide a road map for delivery of the various Programme Measures and associated Schemes. There may also be merits in establishing a national working group overseeing the implementation and monitoring, including environmental and associated outcomes of the programme.

Specific Comments on the SEA Environmental Report are outlined in Attachment 1 and should be taken into account in finalising the Programme.

#### **Future Amendments to the Draft Programme**

Where amendments to the Programme are proposed, these should be screened for likely significant effects in accordance with the criteria as set out in Schedule 1 of the SEA Regulations and should be subject to the same method of assessment applied in the “environmental assessment” of the Draft Programme.

#### **SEA Statement – “Information on the Decision”**

Following adoption of the Programme, an SEA Statement, should summarise the following:

- How environmental considerations have been integrated into the Programme;
- How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Programme;
- The reasons for choosing the Programme adopted in the light of other reasonable alternatives dealt with; and,
- The measures decided upon to monitor the significant environmental effects of implementation of the Programme.

A copy of the SEA Statement with the above information should be sent to any environmental authority consulted during the SEA process.

Should you have any queries or require further information in relation to the above please contact the undersigned.

I would be grateful if an acknowledgement of receipt of this submission could be sent electronically to the following address: [sea@epa.ie](mailto:sea@epa.ie).

Yours sincerely

A handwritten signature in black ink, appearing to read 'Tadhg O'Mahony'.

**Tadhg O'Mahony**  
*Senior Scientific Officer*  
*SEA Section*  
*Office of Environmental Assessment*  
*Environmental Protection Agency*  
*Regional Inspectorate*  
*Inniscarra, County Cork*

### **Specific Comments on the SEA Environmental Report**

The Agency notes the framework of measures and associated schemes to meet the future long term needs of Ireland's forestry sector along with ensuring the need at the same time to protect environmental sensitivities /vulnerabilities.

*Table 1.2 IFS categories* describe the application process and environmental designations associated with the various categories. Both *Table 1.2* and *Table 1.3 Environmental protection and consultation controls process* would be useful to include in the Programme.

#### **Section 3 – Findings of the Scoping Process**

We note that the FWPM catchments have been prioritised for their conservation in Ireland and that proposals for detailed Forest Management Plans for each of these catchments are being considered. A commitment should be included to integrating the Programme and relevant lower level Forestry Plans with the relevant WFD RBMPs and FWPM SBMPs. In addition, the Programme should include a commitment to the requirement for SEA and AA for these Forest Management Plans.

#### **Section 3.4 Key Issues and Likely Future Trends**

In Section 3.4.6 in relation to climate adaptation and mitigation, expansion of native woodland, increased harvesting effects (impacts on habitats, water quality and biodiversity), we note the reference to issues to be addressed under the recently adopted Forestry Policy Review. The summary of key issues in subsection 3.4.8 is also noted. The Programme should clearly identify how these issues are to be addressed in the Programme and, where necessary, in association with other key plans/programmes as appropriate.

#### **Section 4 – SEA Framework and Assessment Methodology**

The inclusion of *Table 4.1- SEA Objectives* is noted. The consideration of ecosystem services is welcomed. *Table 4.2- Forest Ecosystem Services* describes the various provisioning services, regulating, cultural and supporting services considered. The intention to consider an appropriate ecosystems approach in the implementation of the Programme is acknowledged. This concept should be reflected in the final Programme and in its implementation.

Section 6.4 describes the uncertainties associated with the Programme. The Programme should include a commitment that these uncertainties will be taken into account in the implementation of the Programme and lower level plans/programmes and projects arising out of its implementation.

#### **Section 6.5 Cumulative Effects Assessment**

The SEA ER recommends that adhering to existing Forest Service controls and additional mitigation measures outlined in section 7 –Mitigation and Recommendations will minimise the potential for transboundary effects. The proposed Mitigation /Enhancement Measures should be clearly reflected in the Programme.

#### **Chapter 7 Mitigation and Recommendations**

The proposed mitigation measures suggested as well as the additional enhancement measures are welcomed. The Mitigation Measures and Recommendations proposed in *Section 7 – Mitigation and Recommendations* of the SEA Environmental Report (ER) should be reflected in the Programme.

In relation to *Section 7.2.5- Ecology and Nature Conservation*, while it is welcomed that Annex I habitats or habitat of Annex I birds or Annex II species should be avoided, it would also be useful to consider, where relevant, interconnected lands immediately adjoining these habitats are also avoided to ensure that the integrity of these habitats and species are not



adversely affected. An approach to consider would be to apply a minimum buffer zone around relevant designated sites (EU and national) in consultation with the NPWS and other key stakeholders as relevant/appropriate. This should be based on the specific characteristics of the habitats and species in question.

Enhancement measures relating to climate change and carbon sequestration, supporting measures to avoid climate change impacts could be more clearly identified in relation to afforestation, woodland improvement and genetic reproductive material.

### **Chapter 8 – Monitoring and Next Steps**

A commitment to monitoring and reporting on the results of Monitoring Proposals in Section 8 - *Monitoring and Recommendations* should be included in the Programme. The Monitoring Measures in Table 7.1 should be reviewed and suitable Indicators and Targets be assigned against the specific SEA objectives.

A commitment should be provided for reporting on environmental monitoring. This reporting should be linked with relevant Programme related implementation monitoring. This should be developed and agreed with the relevant statutory environmental authorities and should be based on *Table 7.1 - Suggestions for Possible monitoring and measures*.