



Dr Eugene Hendrick
Forest Sector Development/COFORD Division
Department of Agriculture Food and the Marine
Agriculture House
Kildare Street
Dublin 2

23rd August 2013

Our Ref: SCP130304.2

Re: Draft Forest Policy Review and Strategic Environmental Assessment

Dear Dr. Hendrick

The EPA acknowledges your correspondence, received 1st of July 2013, in relation to the Draft Forest Policy Review (FRP) and associated SEA Environmental Report (ER). The EPA welcomes the opportunity to make a submission on which we have focused primarily on the integration of environmental considerations into the FPR and on significant aspects in relation to the SEA ER. You are also referred to the EPA's SEA scoping submission dated 23rd of May 2013.

The EPA recognises the potential role that forestry has in Ireland's economic recovery. The realisation of significant increases 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. As such, the FPR should provide for a high level of protection of the environment and to promote environmentally sustainable development and management of forestry. This will be achieved by fully integrating environmental considerations in the preparation and implementation of the proposed policy.

The EPA acknowledges that the sub-objectives proposed in the FPR include specific commitments to sustainable forest management principles, taking into account biodiversity and habitat impacts, soil and water impacts and climate change mitigation and adaptation issues. We note that a specific sub-objective is included on Environment and Public Goods, and welcome the commitment that the management of existing forests and the development of the forest sector will be undertaken in a manner that enhances their contribution to the environment and the capacity to provide public goods and services.

Forest Policy Review

It is noted and welcomed that the environmental benefits of forestry are acknowledged and reflected in the new strategic goal for the FPR. The need for environmental protection should also be reflected in this updated strategic goal in the context of the forestry sector and related developments. Consideration should also be given to embedding the principles of and promotion of the principles of environmentally sustainable forestry industry in the strategic goal in keeping with the principles of sustainable forest management.

The stated commitment to ensuring that afforestation, management of existing forests and development of the forest sector are undertaken in a manner that enhances their contribution to the environment and the capacity to provide public goods and services is welcome. However, it is not clear how the proposed phased increase of the level of annual afforestation from the current rate of 7,000 ha to 10,000 ha per annum to 2105 and to 15,000 ha per annum for the period 2016 to 2046 will be achieved in this context.

In particular the geographical areas where this will be achieved needs to be guided by the application of SEA and AA at an appropriate scale. In this regard, it is recommended that a commitment be included in the FPR 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.

As previously highlighted in the EPA scoping submission it is important the FPR be assessed in the context of the relevant aspects of *Food Harvest 2020 (FH2020)* and should take into account any associated environmental assessments. This is not clear in the SEA ER. It was also recommended that the FPR should outline the mechanisms/forest planning systems to be established and implemented, along with the criteria to be applied to spatially identify those areas best suited to afforestation.

There would also be merits in considering preparing an Implementation Plan(s) which will provide a road map for delivery of the various Strategic Actions (SAs) within the FPR and assign responsibility and time frames for their delivery. The SAs should be prioritised and the relevant authorities/agencies responsible for their implementation should be identified.

An aspect of particular relevance in the context of the proposed increase in forest cover is the requirements to ensure existing and proposed forestry does not result in conflict with the overall objectives of the Water Framework Directive. In this regard, in particular, pristine high status waters need to be afforded adequate protection. The FPR and any subsequent spatial forestry plans should include specific additional measures to ensure pristine high status water bodies are not in any way compromised due to forestry or related forestry developments.

For new forestry developments, it will be important that the location of high status sites downstream of the proposed area are identified and protected. In catchments where existing forestry developments may impact high status sites, tighter controls may be needed on clear-felling and crop sizes harvested. There are opportunities for enhancing protection of high status sites through promotion and fiscal support for riparian buffer strips, utilising existing mechanisms, and integrating new forest areas within the landscape with the goal to attenuate nutrient mobility.

Additional aspects which the FPR will need to consider in the context of potential water quality impacts include the potential for commercial forestry to impact on water quality, especially when planted 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.

Consideration will also need to be given to the application of appropriate exclusions based on predefined criteria to ensure the on-going maintenance of high status waters. These should be identified in consultation with the DECLG, EPA, IFI and key relevant stakeholders.

In relation to climate change mitigation, three interlinked activities are discussed (sequestration, replacement of fossil fuel (bioenergy), and materials substitution). While, the discussion is useful, further elaboration is necessary on how the risks of not meeting such an ambitious afforestation programme would impact each activity.

The projections of timber supply highlight this key issue; where there is a requirement to sustain a relatively high level of afforestation in order to maintain various sectors of the industry. However, there appears to be little analysis of the potential impacts should the proposed rates of afforestation not be achieved. For example, if the bioenergy policies outlined are successful, but the afforestation rate manages only to achieve rates seen in recent years, then there is a risk that the carbon sequestration rates projected will be undermined by greater harvest of biomass from a smaller than projected total forest resource.

There is also little consideration of the land use conversion associated with this scale of forest expansion (an increase of between 300-500kha). Careful consideration needs to be given to 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. There is a need to consider the availability of suitable lands for afforestation. However, the FPR does not articulate an effective policy framework by which afforestation on inappropriate soil types can be avoided (leading to a loss of carbon to the atmosphere), other than suggesting that a Working Group would consider and provide guidelines.

Further consideration is required of the possible impacts on the landscape arising from the proposed increase in total forest area. An important policy component to consider is to promote planting of climate resilient, high ecosystem value species. The impact of the FPP on spatial pattern of afforestation needs to be elaborated on more fully. The historic pattern of afforestation has produced fragmented plantation patterns. Analysis and discussion of policies to enhance connectivity to allow movement of flora and fauna in adaptation to climate change is required and could be promoted in the proposed policy.

SEA Environmental Report

A number of aspects of the SEA Environmental Report (ER) should be reviewed and updated as appropriate to fully reflect the requirements of the SEA Directive and national SEA Regulations.

These include the following:

- *Information on how the assessment was undertaken:* the ER should include information on who carried out the SEA; how consultation comments were taken into account; what changes have been made in response to the SEA process; and difficulties encountered in compiling the required information etc. (SEA Directive Annex 1h).
- *Scoping:* an outline should be provided of the SEA scoping process. Where specific topics are not included in the scope (e.g. population, air and material assets), justification should be provided as necessary. A summary of the SEA Scoping process should be included in the ER. This will be required to be included for the post-adoption SEA Statement.

- *SEA findings are not clearly influencing the plan:* There is a lack of clarity on how the SEA process has informed the preparation of the FPR. Both processes would appear to be disconnected and the findings of the SEA process are not clearly reflected in the FPR. Neither the FPR nor the SEA ER refers to how the SEA has influenced the development of the FPR. The role of the SEA in the development of the FPR should be clearly documented in both the FPR and the SEA ER.

In addition, it is not clear whether an Appropriate Assessment (AA), in accordance with the Habitats Directive and associated national Regulations has been undertaken. The status of the AA, either in terms of screening and/or subsequent assessment would need to be clarified. Where AA has been undertaken the findings and recommendations should be reflected in the ER and the FPR.

- *Alternatives:* Alternatives are considered but their significant effects are not identified, described and evaluated as required by Article 5.1 of the SEA Directive. Chapter VII of the SEA ER lists a range of alternatives, and cites parts of the FPR to justify the choice of preferred alternatives. The SEA ER does not, however, assess or compare the impacts of the alternatives. The FPR and the ER provide reasons for making the policy recommendations (i.e. justifying the proposed policy), not "an outline of the reasons for selecting the alternatives dealt with" (as required by Annex I of the SEA Directive).

As previously suggested at the SEA scoping stage, the nature and extent of alternative scenarios to achieve the proposed national forestry targets should be described and included within the scope of the SEA. The alternative scenarios considered and justification of selection of the preferred scenario should be described in both the FPR and the ER.

- The assessment should also take into account the potential for cumulative/ in-combination effects in the context of both the SEA and Habitats Directive, and other key plans/strategies. In particular, the potential for conflict with the objectives of the WFD should be assessed. The implications Food Harvest 2020 and Climate Change should also be considered. In this context, a total life cycle assessment of the carbon footprint of the proposed forest coverage would be useful to take into account carbon storage potential of forestry. The impact of the proposed increased forest cover on freshwater ecosystems would also need to be considered and assessed.
- *Absence of an impact assessment:* The likely significant effects of the FPR (as required by Annex I (f) of the SEA Directive) are not identified in the ER. In this regard, the effects of the FPR's strategic actions should be assessed against a series of SEA objectives. This is a key component of the SEA process, and its omission is in conflict with the requirements of the SEA Directive.
- *Lack of Mitigation Measures:* As an assessment of the effects has not been undertaken, it is not possible to identify "the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan" (Annex I (g) of the SEA Directive). While Chapter VI (pp. 46-47) of the ER is entitled 'Measures envisaged...', the listed measures already form part of the FPR, and are not considered to be those envisaged to deal with *effects/impacts* of the FPR.

Appropriate mitigations measures should be identified to address any specific significant effects identified in the assessment. These measures should be reflected in specific commitments / Strategic Actions in the FPR.

- *Monitoring:* A detailed programme to monitor the significant effects of implementing the proposed new annual planting targets should be established in partnership with other relevant stakeholders. To facilitate monitoring Actions should be assigned specific Target and where relevant an Indicator to facilitate monitoring, review and reporting on implementation of the Actions.

The relevant aspects should be set within a WFD River Basin District framework. These monitoring proposals should also be reflected in regional/ catchment level spatial Forestry Plans. Subsequent reviews of the FPR and associated reporting should also be linked with SEA related environmental monitoring and reporting.

Given the scale of the FPR and its relevance in the context of International River Basin Districts., transboundary consultation with the relevant Northern Ireland authorities should be considered in accordance with the SEA Directive and Regulations.

Finally, the EPA would welcome an opportunity to meet with you and discuss the Draft FPR and associated SEA ER to outline more detailed comments and areas for clarification.

Should you have any queries or require further information in relation to the above please contact Tadhg O'Mahony at t.omahony@epa.ie. Please provide an acknowledgement of receipt of this submission to sea@epa.ie.

Yours Sincerely



**Dr Mícheál Lehane,
Programme Manager
Office of Environmental Assessment**