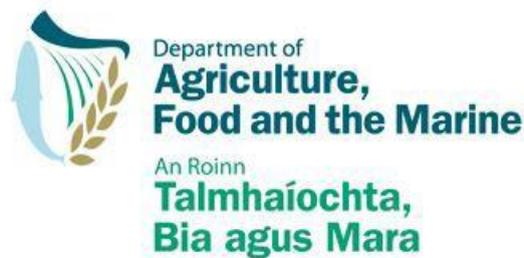


SEA STATEMENT
ON THE
FOREST POLICY REVIEW:

Forests, products and people – Ireland’s forest policy – a renewed vision

STRATEGIC ENVIRONMENTAL
ASSESSMENT



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SECTION 1 INTRODUCTION

1.1 Purpose of Report

This is the Strategic Environmental Assessment (SEA) of the Forest Policy Review Forests, products and people – Ireland’s forest policy – a renewed vision. The main purpose of the SEA Statement is to indicate how environmental considerations, the views of consultees and recommendations have been incorporated in the decision making process in the formulation of the Forest Policy Review.

1.2 SEA Definition

SEA is a systematic process of predicting and evaluating the likely environmental effects of implementing a plan, or other strategic action, in order to ensure that these effects are appropriately addressed at the earliest appropriate stage of decision-making on a par with economic and social considerations.

1.3 Legislative Context

The requirement to carry out a Strategic Environmental Assessment stems from the Strategic Environmental Assessment Directive (2001/42/EC) which states:

The objective of this Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans..... with a view to promoting sustainable development.....

The Directive was introduced into Irish Law in 2004.

1.4 Content of the SEA Statement

Article 9 of the SEA Directive (2001/42/EC) provides that the environmental authorities and the public must be provided with an SEA Statement as soon as is practical after a Plan is adopted.

The SEA Statement is required to include information summarising:

- a) how environmental considerations have been integrated into the Plan,
- b) how
 - the environmental report,
 - submissions and observations made of the proposed Plan and the Environmental Report, and
 - any transboundary consultationshave been taken into account during the preparation of the Plan.
- c) the reasons for choosing the plan, as adopted, in the light of other reasonable alternatives dealt with, and
- d) the measures decided upon to monitor the significant environmental effects of implementation of the Plan.

1.5 Implications of SEA for the Review

In line with legislation, the Review -Forests, products and people – Ireland’s forest policy – a renewed vision - was required to undergo Strategic Environmental Assessment (SEA).

An Environmental Report was prepared in conjunction with the production of the 1st formal draft of the Review. The purpose of the Report was to provide an understanding of the likely environmental consequences of decisions regarding the future strategic direction and expansion of forestry in Ireland.

SECTION 2 How Environmental Considerations were integrated into the Review

Environmental considerations were integrated into the Review at a number of stages during its formulation. The Review was conducted by a Stakeholder Group (SG) which comprised representatives from across the forest sector and from environmental groupings. In addition, an *ex ante* public consultation process was undertaken to inform the SG and its work in formulating the Review.

The submissions¹ contained a number of issues related to the environment and forestry which were subsequently considered.

Chapter 3 of the Review (Environment and Public Goods) deals specifically with forestry and the environment and contains the following policy statement:

To ensure that afforestation, management of existing forests and development of the forest sector are undertaken in the manner that ensures compliance with environmental requirements and objectives, and enhances their contribution to the environment and their capacity for the provision of public goods and services.

Chapter 3 concludes by putting forward 12 strategic actions related to environmental issues. Other chapters also contain references to crosscutting environmental considerations.

Additionally, environmental considerations were also integrated during the SEA process i.e. at the Scoping Stage, at the Environmental Report Stage and following receipt of submissions and observations from Environmental Authorities, stakeholders and the general public.

Regarding appropriate assessment (AA) under Article 6 of the Habitats Directive, comprehensive Forest Service AA and forest consent procedures are in place at project level. Plans of a general policy nature (such as the Review) require an appropriate assessment to be undertaken only where there is a clear and direct link between the content of the Plan and the likely significant effects on an identifiable Natura 2000 site.

¹ See Appendix no 7 in Forest Policy Review for list of *ex ante* submissions.

2.1 Scoping Report

On 26th March 2013 a detailed Scoping Document for the Preparation of an Environmental Report on the Review of Forest Policy was sent to the five statutory Environmental Authorities (the Environmental Protection Agency; the Department of Environment, Community and Local Government; the Department of Communications, Energy and Natural Resources; the Department of Arts, Heritage, Gaeltacht; and the Department of Agriculture, Food and the Marine) seeking their views on the scope of the SEA within a six week timeframe.

The Scoping Document provided information on

- I. General background to the forest policy review and the environmental report;
- II. Key aspects of the terms of reference from an environmental perspective and for consideration in the preparation of the environmental report;
- III. Forest policy review formulation process;
- IV. Contents of the forest policy review to be referred to in the environmental report;
- V. Main policy objectives and related environmental issues;
- VI. Implementation of recommendations and actions contained in the review with reference to the environmental report;
- VII. Context for the forest policy review in relation to other policies and measures, particularly those relating to the environment; and
- VIII. Relevant aspects of the current state of the environment to be dealt Environmental Report.

2.2 Environmental Report

The Environmental Report was prepared alongside the Forest Policy Review. It describes and evaluates implementation of the Review on the receiving environment. The Environmental Report also benefits from and contains material suggested for consideration by the Environmental Authorities.

2.2.1 Baseline

The overall policy baseline for the Review was Growing for the Future, which was issued in 1996. In addressing the environmental considerations in the Review the specific baseline applied was the Environmental Protection Agency report Ireland's Environment 2012 - An Assessment. It "... provides an integrated assessment of the overall quality of Ireland's environment, the pressures being placed on it and the societal responses to current and emerging environmental issues".

The Environmental Report also contains supplementary baseline information under key environmental headings:

- biodiversity
- human health
- fauna
- flora
- soil
- water
- climatic factors
- cultural heritage
- landscape and
- the interaction of these factors

2.2.2 Key Environmental Issues Identified

Key environmental issues that were identified in the course of the development of the Forest Policy Review {including discussions in the SG, from the ex ante stakeholder consultation, during the Scoping stage and during the follow-on public consultation (see 3.3)} fell into two categories:

1. Drivers of forest policy in their own right:
 - climate change mitigation and adaptation,
 - expansion of native woodland and
 - provision of forest recreation space.

2. Environmental issues arising from forest expansion and increased levels of harvesting:
 - potential impacts on habitats,
 - water quality and
 - biodiversity.

In addition, environmental issues and drivers were identified for a number of sub-objectives in the Review:

Sub-objective	Environmental issues and drivers
<p>1. <u>Expansion of the Forest Resource</u> - To increase the forest area in accordance with sustainable forest management principles, in order to support a long term sustainable roundwood supply of 7 to 8 million m³ per annum.</p>	<p>Biodiversity and habitat impacts including fauna and flora, expansion of native woodland, expansion of forest recreation space, soil and water impacts and ameliorative aspects of forest cover expansion, climate change mitigation and adaptation, protection of archaeological heritage</p>
<p>2. <u>Management of the Resource</u> - To ensure the sustainable management of the forest resource in accordance with best practice thereby ensuring its capacity to provide the full range of timber and other benefits.</p>	<p>Need for adherence to principle of sustainable forest management and to develop systems that support its implementation, such as forest management planning. Sustained provision of public goods, including biodiversity conservation and enhancement, water quality, climate change mitigation and public recreation. Support for the research into and the more widespread use of low impact silvicultural systems (LISS)</p>
<p>3. <u>Environment and Public Goods</u> - To ensure 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.</p>	<p>Compliance with international and national legislation, as well as guidelines and practice procedures, with the objective of sustaining and increasing the level and quality of public goods provision.</p>

4. <u>Supply Chain</u> - To develop an efficient and environmentally responsible supply chain, compatible with forecast volumes, which will enhance the competitiveness of the processing sector and increase its wood paying capacity to forest owners.	Guidelines for forest harvesting and transport of roundwood for good environmental practice including guidance on forest road construction, upgrading and maintenance
5. <u>Wood Processing</u> - To support the development of an innovative, value-added and market focused sector which provides sustainable solutions to a diverse portfolio of users in the construction, lifestyle, energy, furniture and related markets.	Potential for increased impact through increase in capacity and or change of processes
6. <u>Forest Protection and Health</u> - To maintain a healthy forest environment through sustainable forest management, early detection and control measures for pests and diseases	Protection of biodiversity, control of alien and damaging species
7. <u>Education Training and Research</u> - To ensure the availability of suitable programmes of education and training across the sector and research programmes targeted at identified needs.	Research on forest soils and water and biogeochemical cycling in support of sustainable forest management, research and assessment of forest genetic resources and the impacts of forests and forest operations on specific flora and fauna and on biodiversity in general, quantification of the impacts of forests on climate change mitigation and the adaptation of forests to climate change
8. <u>Policy Implementation and Review</u> - Policy will be implemented through ongoing monitoring and reporting of progress in consultation with stakeholders, and the policy will be updated to meet changing needs and circumstances.	Review would include environment related matters as outlined in the policy
9. <u>Funding</u> – To support the development of the forest sector through a combination of funding and fiscal arrangements including joint EU funding, direct State funding and private investment.	
10. <u>Legislation</u> – To ensure that forest related legislation is relevant to the needs of the sector and underpins the principles of sustainable forest management while recognising the multifunctional nature of forestry.	Changes in the regulatory framework to ensure co-ordinated and holistic approach to the treatment of environmental issues and compliance
11. <u>State Forest Enterprise - Coillte</u> – Coillte, in common with other State enterprises, is the subject of a separate Government policy examination	
12. <u>Institutional Arrangements</u> - To support the development of the Forest Service as an efficient delivery service organisation meeting the needs of Government, national forest policy and the forest sector.	
13. <u>Sectoral Development</u> - To set up a Task Force to consider the establishment of a stand-alone government body or agency which could have the responsibility of addressing the developmental and promotional issues of the forest sector.	The stand alone agency would in effect act as the Competent Authority for forestry and environment matters

2.2.3 Environmental Assessment

Chapter 2 of the Environmental Report provides an assessment of relevant aspects of the current state of the environment related to the headings in 2.2.2.

Chapter 3 outlines environmental characteristics of areas likely to be significantly affected by the implementation of the recommendations in the Review.

Chapter 4 identifies existing environmental problems that are relevant to Forests, Products and People including, in particular, those relating to any areas of a particular environmental importance, such as areas designated under the Birds and Habitats Directives.

2.2.4 Mitigation

As a result of the consultative processes and on the subsequent deliberations of the SG, a number of mitigation measures are included as Strategic Actions (SA) in the Review (principally in Chapter 3 – Environment and Public Goods). The rationale for the actions and the continuation of the existing mitigation measures are outlined in Chapters I, II and VI of the Environmental Report and these are tabulated below.

Environmental issue	Existing and envisaged measure(s)
Habitats, biodiversity and flora and fauna	Compliance with the procedures outlined in the Forest Service Forestry Schemes Manual and the

	<p>Appropriate Assessment Procedures in relation to habitats and species²</p> <p>Updating and implementation of the Forest Service Guidelines on: Forestry Biodiversity Forest Harvesting and the Environment Forestry and Freshwater Pearl Mussel Requirements Forestry and Otter Forestry and Kerry Slug Forestry Protection</p>
Water quality	<p>Implementation of the Programme of Measures and Standards For Forest and Water under the Water Framework Directive</p> <p>Implementation of the Protocol for the determination of the acid sensitivity of surface water in the context of afforestation and the recent update³, and water quality protection measures laid out in the Forestry Schemes Manual.</p> <p>Updating and implementation of the Forest Service Guidelines on: Forestry and Water Quality Forestry and Aerial Fertilisation Forest Harvesting and the Environment</p>
Archaeological heritage and landscape	<p>Updating and implementation of the Forest Service Guidelines on: Forestry and Archaeology Forestry and the Landscape Forest Harvesting and the Environment</p>
Soils	<p>Compliance with the procedures outlined in the Forest Service Forestry Schemes Manual</p> <p>Implementation of the recommendations on minimum site productivity for afforestation</p> <p>Introduction of guidance and criteria for the identification and future management of peat areas currently afforested which are to be deforested to mitigate continued environmental degradation.</p>

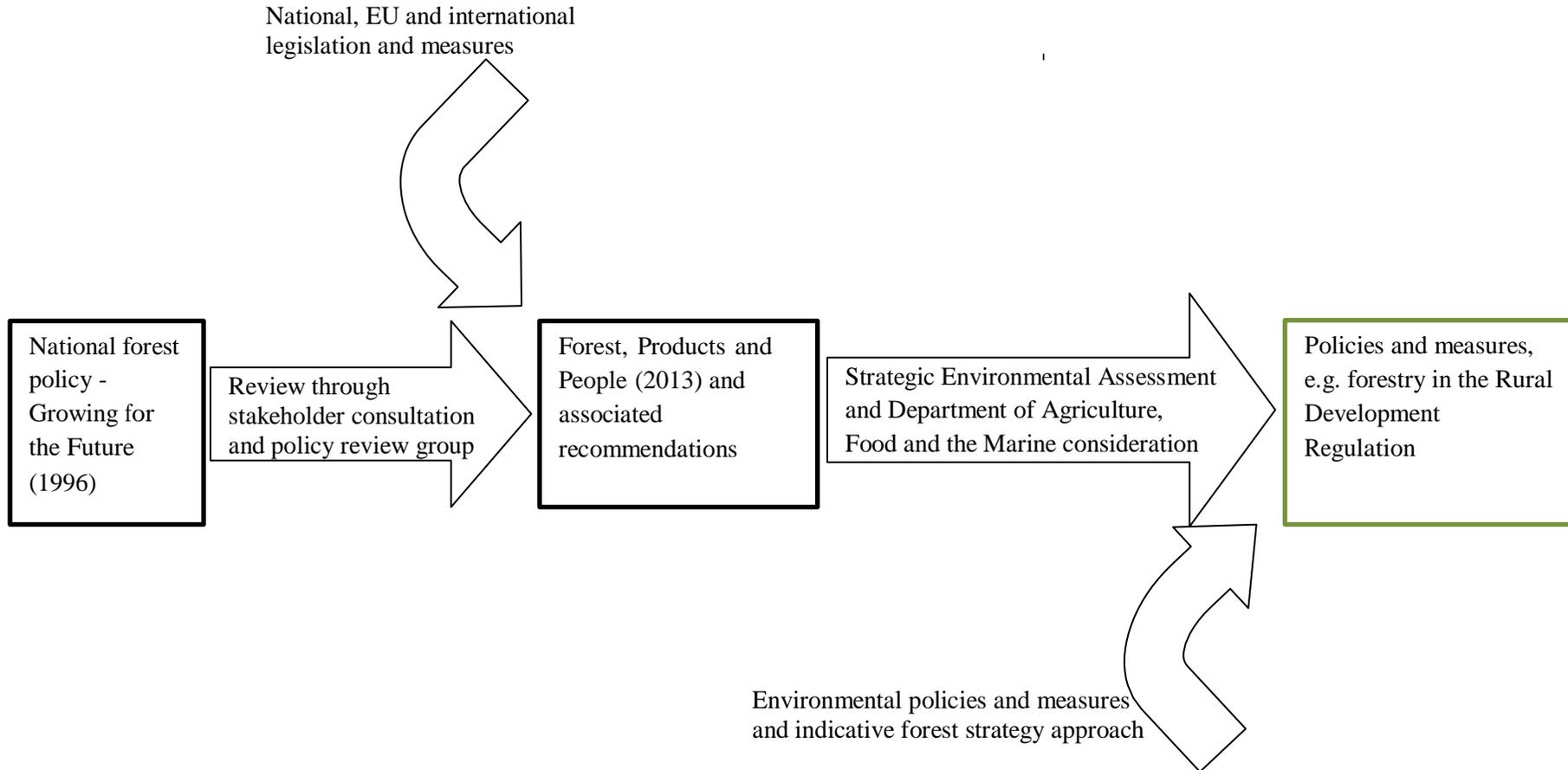
² An updated version of the procedure has been issued in Forest Service Appropriate Assessment Procedure Information Note, March 2012. It covers Natura Impact Statements as well as procedures in relation to freshwater pearl mussel and Hen Harrier.

³ See Forest Service Circular 4 of 2013: Native Woodland Establishment Scheme – Acid Sensitivity Protocol for Afforestation and revised Native Woodland Scheme Establishment Site Appraisal Framework (14Feb13),

Section 3 Submissions and observations during the SEA process

3.1 Introduction

In order to illustrate how submissions and observations were considered during the SEA, the overall process involved in developing the Review is outlined below. The baseline forest policy was Growing for the Future which was published in 1996. As indicated previously, the baseline environmental policy was Ireland's Environment 2012- An Assessment. Other national, international and EU legislation and measures were also considered in formulating the Review.



It should be pointed out that the preliminary text of the Review was formulated as a result of the deliberations of the SG which met on 15 occasions from 2010 to 2012.

The process involved the following stages where submissions and observations were received and considered:

- 2010 call for submissions for consideration by SG.
- Deliberations of SG (2010-2012).
- Scoping consultation with statutory environmental authorities (March 2013).
- Full public consultation on the Review and the draft Environmental Report (June to August 2013).
- Final SG consultation (January 2014).
- Bilateral discussions and meetings with statutory environmental authorities at all consultation stages.

3.2 SEA Scoping Consultations

Following the Scoping Consultation round, discussions took place with the Environmental Protection Agency in relation to the following issues and these were addressed as indicated below:

Issue raised - Spatial identification of areas suitable for afforestation.

Response – As a result of this issue being raised, Chapter III of the Environmental Report under Afforestation outlines productivity thresholds and environmental considerations to guide forest expansion⁴. In addition, the Indicative Forestry Statement approach was outlined. In brief, the Indicative Forest Statement recognises four broad categories to identify areas for afforestation:

Category 1 - Suitable for a range of forest types,

Category 2 - Suitable for certain types of forest development,

Category 3 - Suitable, where appropriate, for nature conservation and/or amenity forests and,

Category 4 - Unsuitable, unproductive or unplatable areas.

Issue raised - Preparation of forest plans at national and river basin district level.

⁴ It should be noted that the approach as outlined generally applies at a macro level and not at individual site level. In practice, individual sites are assessed based on productivity potential and environmental and other considerations.

Response – The Review encompasses a national high level forest policy. Also, the current River Basin District Plans (RBDPs) include measures relating to forestry. It is anticipated that the RBDPs will be reviewed and updated by the appropriate environmental authority, to include a review of the existing forestry measures.

Issue raised -Alternative scenarios to achieve national forest cover targets.

Response – As a result of this suggestion, Chapter VII of the Environmental Report outlines how the assessment of alternative courses of action was undertaken and how policy recommendations were formulated. Specifically in relation to the achievement of national forest cover targets, the main alternatives analysed were:

- Continuation of current levels of afforestation i.e. 6-7,000 ha per annum.
- Increase level of afforestation to 10,000 ha per annum.
- Increase level of afforestation to 15,000 ha per annum.
- Increase level of afforestation to 20,000 ha per annum.

Chapter VII also outlines the detailed rationale for the afforestation rates recommended in Strategic Action 1.1.

Issue raised - Potential for cumulative and in-combination effects.

Response – On foot of this suggestion, the Environmental Report in Chapter III, sets out that *where these areas contain or are adjacent to Natura 2000 areas, including Hen Harrier SPAs and SACs designated for Freshwater Pearl Mussel (FPM), permission for afforestation, forest roads or aerial fertilisation is contingent on the Forest Service arriving at a conclusion, through its Appropriate Assessment Procedure, that the project – either singly or in combination with other plans and projects – will not significantly affect the Natura site.*

Chapter III also sets out that *roundwood harvesting and associated forest roading operations will take place on a range of site types including blanket peat over the coming decade and the period encompassed in Forests, Products and People. Over 40% of the forest estate is estimated to be located on peat soils (Forest Service 2007). Harvesting may also take place in areas designated under the Birds Directive as Hen Harrier SPAs and in SACs designated for Freshwater Pearl Mussel (FPM), where, following the application of its Appropriate Assessment Procedure, the Forest Service has determined that the project – either singly or in combination with other plans and projects – will not significantly affect the Natura site.*

Issue: Total life cycle assessment of carbon footprint of the proposed increase in forest cover including impacts on freshwater ecosystems.

Response: The Environmental Report (Chapter I) sets out the role of forests in addressing climate change mitigation and it deals with the full carbon footprint of forests and forest products. Chapter II (on relevant aspects of the current state of the environment) also considers climate change mitigation and adaptation aspects of forests and the impacts of increased levels of afforestation on mitigation including, materials and fossil fuel substitution.

Regarding impacts on freshwater ecosystems from the proposed increase in forest cover, the Environmental Report (Chapter I) outlines the national policy in relation to forests and water which is set out in the Programme of Measures and Standards for Forest and Water under the Water Framework Directive. Chapter II deals with significant effects of the expansion of forest cover and harvesting and points out the role that the current Forest Service guidelines have in relation to the protection of water quality. The Environmental Report also refers to the proposals in the Review to update the suite of environmental guidelines based on recent scientific findings. It also covers measures related to protection of the Freshwater Pearl Mussel. Chapter VI of the ER outlines in summary format (in Table 2) environmental effects (including water quality) likely to arise as a result of the recommendations in the Review and measures envisaged to prevent, reduce and offset them.

Issue: Need to identify control measures for silt and nutrient losses from forestry.

Response: The control measures are outlined in ER Chapter II in relation to implementation of the Water Framework Directive (see above). Table 2 in Chapter VI outlines in summary format environmental effects (including water quality) likely to arise as a result of the recommendations in the Review and measures envisaged to prevent, reduce and offset them. These include measures to control silt and nutrient losses from forests.

Issue: Potential of the review recommendations to provide a net environmental benefit in relation to ecosystem services, flood prevention, decreased soil erosion and increase in biodiversity to be highlighted in the Environmental Report.

Response: Chapter II of the Environmental Report outlines the benefits of the implementation of the Review recommendations for flora and fauna, human health, climate change mitigation, water quality and flood risk attenuation, cultural heritage and landscape. The analysis includes a comparison of the baseline scenario with the implementation of the recommendations contained in the Review.

Issue: Potential of clear felling to adversely impact on environmental benefits, and possible mitigation measures to be outlined.

Response: The potential for clearfelling to adversely impact on environmental benefits are outlined in ER Chapter III/ Roundwood Harvesting. In addition Chapter IV outlines issues likely to arise in areas of particular environmental importance including areas designated under the Birds and Habitats Directives. Table 2 in Chapter VI outlines in summary format environmental effects (including water quality) likely to arise as a result of the recommendations related to increased levels of harvesting.

Issue: Monitoring programme to be established to consider significant effects of proposed new annual planting targets.

Response: Chapter VIII of the Environmental Report provides a description of the measures envisaged to monitor impacts of the proposed new annual planting targets.

Issue: Transboundary consultation with relevant Northern Ireland authorities.

Response: From a transboundary perspective, the Northern Ireland forest authority was informed of and provided with copies of the draft Forest Policy Review and the associated draft Environmental Report.

3.3 Submissions and Observations on the Draft Plan and Environmental Report

Following the Scoping Report Stage, an Environmental Report was prepared in parallel with the production of the draft Review. The purpose of the Environmental Report was to provide an understanding of the likely environmental consequences of decisions regarding the future strategic direction and expansion of forestry in Ireland.

The public consultation on the draft Review and the draft Environmental Report took place from June to August 2013.

Submissions received by the closing date as part of this phase of the SEA process are listed herewith:

Birdwatch Ireland
Climate Change Section, DAFM
Crann
Department of Communications, Energy and
Natural Resources
Department of Arts Heritage and the Gaeltacht
CELT, Forest Friends, The Woodland League and Irish Natural
Mr. James Doorley
Forestry Foundation
Forestry and Forest Product Stakeholders Group
The Environment Protection Agency
Geological Survey of Ireland
Dr. Rory Harrington
Irish Farmers Association Inland
Fisheries Ireland Irish Timber
Council Kerry County Council
Laois Sawmills
Roscommon County Council
Society of Irish Foresters

These were considered and resulted in changes to both the draft Review and the draft Environmental Report – see below for summary.

In addition, observations by DAFM and the Stakeholder Group were also considered.

In the following table amendments and additions from the circulated versions of the Review and the Environmental Report are italicized.

Review	ER	Organisation	Suggestion	Amendment/Addition
Review. Strategic Goal.		Environmental Protection Agency	The Strategic Goal should be in accordance with the Forest Europe definition of sustainable forest management.	To develop an internationally competitive and sustainable forest sector that provides a full range of economic, environmental and social benefits to society and which accords with the Forest Europe definition of sustainable forest management.
Review. Strategic Goal.		Mr. John Phelan (SG)	Footnote to elaborate on source of Forest Europe definition of sustainable forest management.	<i>Forest Europe (The Ministerial Conference on the Protection of Forest in Europe) is the pan-European political process for the sustainable management of the continent's forests and defined SFM (Helsinki 1993) as the stewardship and use of forests and forest lands in a way, and at a rate, that maintains their biodiversity, productivity, regeneration capacity, vitality and their potential to fulfil, now and in the future, relevant ecological, economic and social functions, at local, national, and global levels, and that does not cause damage to other ecosystems.</i>
Review. Chapter 1. Expansion of the Forest Resource Area		Environmental Protection Agency	Suggested adoption of a catchment based approach regarding forest expansion and operations	The Indicative Forestry Statement, which provides a map-based approach towards consideration of applications for forest operations, together with the phasing in of forest management plans, are considered to provide for an based approach.

<p>Review. Chapter 1. Expansion of the Forest Resource Area</p>		<p>Department of Arts, Heritage and the Gaeltacht.</p>	<p>Provide further information of the Forest Service Indicative Forest Statement procedure.</p>	<p>The following text was added: <i>The overall aim of the Indicative Forestry Statement (IFS) is to provide high-level, national guidance in relation to the suitability of land for afforestation. One of the key aspects of delivering a balanced programme is to ensure, as far as possible, that new forests integrate, enhance and reflect the diversity and local distinctiveness of the landscape in which they are set. It is also fundamentally important to provide the public and the forest industry with the earliest indication of the areas where potentially sensitive issues may arise in relation to, for example, landscape, water quality, archaeology and biodiversity. Because of the large number and density of recorded archaeological monuments they are not represented on the IFS national map. Instead all forestry applications that may affect an archaeological monument or site are forwarded to the Forest Service archaeologist who consults with the National Monuments Service (NMS). It is planned that maps of all ‘archaeological areas’, ‘zones of archaeological potential’, ‘zones of archaeological amenity’ and World Heritage Sites will be included on the IFS map when digitisation is finalised by the NMS⁵.</i></p>
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⁵ Whilst not visually represented at present on the IFS national map, potential impacts on “archaeological areas”, “zones of archaeological potential”, and World Heritage Sites, are also taken into consideration. See pages 27 to 29 of the Environmental Report for further details.

				<p><i>The IFS is a map-based approach which integrates many different spatial datasets which take account of a wide range of environmental factors and other opportunities and constraints. The IFS identifies areas most suitable for planting primarily on the basis of environmental considerations and soil-productivity. The map-based environmental considerations have been captured from a variety of state organisations, such as the National Parks and Wildlife Service, the Fisheries Boards, the EPA and the Local Authorities. The forest productivity map was compiled in co-operation with Teagasc and is based on soil type and elevation, displaying the potential rate of growth of forests throughout the country.</i></p>
Review Strategic Action 1.11		DAFM	Need to take account of climate change adaptation needs in relation to reviewing the most appropriate species mix	DAFM in collaboration with the wood products and wood energy sectors and other stakeholders should regularly review the most appropriate species mix to meet expected market needs taking into account sustainable forest management <i>and climate change adaptation needs.</i>
Review. Strategic Action 1.16		The Woodland League, CELT, Forest Friends and the Irish Natural	Recognition of the potential role of agroforestry in meeting renewable energy, climate	DAFM in collaboration with the Department of Communications, Energy and Natural Resources to undertake an appraisal of the appropriate balance

		Forest Foundation	change mitigation and forest industry raw material needs.	between afforestation including short rotation forestry, biomass support schemes <i>and other related measures such as agroforestry</i> in meeting renewable energy, climate change mitigation and forest industry raw material needs, <i>in the context of the overall level of roundwood availability.</i>
Review. New Strategic Action 1.18		Dr. Rory Harrington	Role of riparian woodlands.	<i>DAFM will consider proposals for the establishment of riparian woodlands with a view to their function in mitigating flooding and enhancing water quality (see also 3.12)</i>
Review. Strategic Action 2.11		Mr. John Phelan (SG)	Clarification of conservation management interaction.	DAFM will encourage the management of all broadleaves including native woodlands for timber production and where there is a particular conservation <i>or protection requirement</i> , shall, in cooperation with the National Parks and Wildlife Service and other Government agencies, facilitate management that is compatible with such objectives.
Review. Strategic Action 2.11		DAFM	Clarification of role of other agencies in conservation management.	DAFM will encourage the management of all broadleaves including native woodlands for timber production and where there is a particular conservation or protection requirement, shall, in cooperation with the National Parks and Wildlife Service <i>and other Government agencies</i> , facilitate management that is compatible with such objectives.

Review. Strategic Action 2.12		DAFM	Need to formalise a national tree improvement programme.	DAFM to establish a representative National Forest Genetic Resources Advisory Group to guide all aspects of future genetic requirements and advice on the management of reproductive material and tree improvement and breeding programmes <i>including formalising the national tree improvement programme.</i>
Review. Chapter 3.		DAHG	Clarification of Forest Service appropriate assessment procedures in context of forest consent system.	<i>To this end, the Forest Service operates an Appropriate Assessment Procedure (AAP) which is applied to all forest related activities requiring Forest Service consent, i.e. afforestation, forest road construction, felling (thinning and clearfell/replanting) and aerial fertiliser application.</i>
Review. Chapter 3.		DAHG	Expansion of forest area not contingent on Natura areas. Role of Forest Service appropriate assessment procedure in determining that afforestation proposals, either alone or in combination with other proposals, will not significantly affect the Natura site. Continued focus on Native Woodland Scheme in Natura areas to contribute to the protection of relevant habitats and species.	<i>The overall expansion of the forest estate as envisaged in this Review will not be contingent on afforestation in Natura areas. Such planting will only receive approval if the Forest Service, through the application of the AAP, has determined that the project - either alone or in combination with other plans or projects - will not significantly affect the Natura site. There will continue to be a focus on the use of the Native Woodland Establishment Scheme in Natura areas, where compatible and in partnership with landowners and the National Parks and Wildlife Service, to contribute to the protection of relevant habitats and</i>

				<p><i>species.</i></p> <p><i>Full details of the operation of the AAP are set out the Forest Service Appropriate Assessment Procedure Information Note (see consolidated version March 2013).</i></p>
Review. Chapter 3.		EPA	Clarification of procedures and initiatives re Freshwater Pearl Mussel (FPM) and Hen Harrier.	<p><i>The Forest Service is currently engaged in specific initiatives regarding Freshwater Pearl Mussel (FPM) and Hen Harrier, both of which are species of high conservation value and under significant threat. Regarding FPM, the Forest Service is currently developing Catchment Forest Management Plans for eight priority FPM catchments identified as having the greatest potential for the successful long-term conservation of the species. Regarding Hen Harrier, the Forest Service will be inputting to the development by National Parks and Wildlife Service of a Threat Response Plan for SPAs designated for the species which commenced in mid 2013 and is expected to be completed by mid 2015.</i></p> <p><i>Both processes recognise the potential impacts that can arise from forestry, and also the potential contribution this landuse can make to the protection of each species. Both processes will also involve detailed consultation with forestry stakeholders. Further details are set out in the document entitled Environmental Report on the Forest Policy Review.</i></p>
Review.		Mr. John Phelan (SG)	Add “relevant” in context of	All relevant proposed EU regulations, EU

Strategic Action 3.2.			proposed EU Regulations etc.	Directives and national legislation should be subject to full stakeholder consultation and Regulatory Impact Assessment as per RIA guidelines.
Review. Strategic Action 3.2.		Ms. Anja Murray (SG)	Remove “forest related” in context of proposed EU Regulations etc as Birds and Habitats Directives apply generally across SACs and SPAs.	Word “relevant” added to replace “forest related” - All <i>relevant</i> proposed EU regulations, EU Directives and national legislation should be subject to full stakeholder consultation and Regulatory Impact Assessment as per RIA guidelines.
Review. Strategic Action 3.2		DAFM	Add “as per RIA guidelines” in order to set out the scope of RIA process.	All relevant proposed EU regulations, EU Directives and national legislation should be subject to full stakeholder consultation and Regulatory Impact Assessment <i>as per RIA guidelines</i> .
Review. Strategic Action 3.3		EPA	Forest Service Water Quality Guidelines to include reference to buffer zones. The revised guidelines to facilitate compliance of forestry activities with the overall environmental regulatory framework including the WFD (to include high status waters) and other Directives.	DAFM in collaboration with the main sector stakeholders to update the complete set of environmental guidelines with priority given to guidelines that address water quality, fertilisation and biodiversity. In the revision consideration should be given to structuring the guidelines so they can be used either at forest developmental stages (establishment, thinning, harvesting) or thematically to deal with water, biodiversity etc. The revised guidelines should be comprehensive, provide clarity regarding requirements <i>including buffer zones as appropriate</i> , permit procedures and facilitate compliance of forestry activities with the overall environmental

				regulatory framework <i>including inter alia the Water Framework Directive (including high status waters), the EIA Directive, the Birds Directive and the Habitats Directive.</i>
Review. Strategic Action 3.3		Ms. Anja Murray (SG)	Add “Birds Directive” to the inter alia listing of environmental regulatory framework instruments.	DAFM in collaboration with the main sector stakeholders to update the complete set of environmental guidelines with priority given to guidelines that address water quality, fertilisation and biodiversity. In the revision consideration should be given to structuring the guidelines so they can be used either at forest developmental stages (establishment, thinning, harvesting) or thematically to deal with water, biodiversity etc. The revised guidelines should be comprehensive, provide clarity regarding requirements including buffer zones as appropriate, permit procedures and facilitate compliance of forestry activities with the overall environmental regulatory framework including inter alia the Water Framework Directive (including high status waters), the EIA Directive, <i>the Birds Directive</i> and the Habitats Directive.
Review. Strategic Action 3.4		Dr. Rory Harrington	Consider the “ecosystem approach” in updating the Code of Best Forest Practice and National Forest Standard.	DAFM to update the Code of Best Forest Practice and the National Forest Standard to reflect changes in the suite of environmental guidelines, changes in best practice, changes in the regulatory and

				compliance framework and as a means to support compliance with the principles of sustainable forest management <i>and the ecosystem approach as elaborated in the 2008 MCPFE (now Forest Europe)/PEBLDS jointly adopted Pan-European Guidelines for Afforestation and Reforestation.</i>
Review. New Strategic Action 3.5		DAFM	Clarification that the Irish National Forest Standard will be used as the basis for reporting on state of Ireland's forests.	<i>The Irish National Forest Standard will be used as the basis for reporting on the state of Ireland's forests and on sustainable forest management.</i>
Review. New Strategic Action 3.7		DAHG	Forest Service inspectors would benefit from training in assessing habitat types in afforestation proposals.	<i>Training will be provided to Forestry Inspectors in the first instance; and its rollout to forestry practitioners will be considered as appropriate, to enable the assessment of habitat types in afforestation proposals.</i>
Review. New Strategic Action 3.12		Dr. Rory Harrington	Consideration of the water and wetlands benefits of forests to be included in a reformulation of the Native Woodland Establishment Scheme.	<i>Initiatives and measures which aim to enhance the water and wetlands benefits of forests will be considered under the Native Woodland Establishment Scheme.</i>
Review. Chapter 4 Policy Statement		Irish Council Timber	Add "sustainable" in context of development of supply chain.	To further develop an efficient, sustainable and environmentally responsible supply chain that is compatible with forecast volumes, which will enhance the competitiveness of the processing sector and its wood paying capacity to forest owners.

Review. Strategic Action 4.1		Mr. John Phelan (SG), Mr. Gerard Murphy (SG), Mr. Donal Whelan (SG).	Consider amending SA 4.1 in order to clarify the development of a National Roundwood Mobilisation Strategy	<i>In consultation with stakeholders, DAFM will develop a National Roundwood Mobilisation Strategy to implement improved efficiency and logistics along the supply chain from grower to final end user, bearing in mind the increased volumes that will now come from the private sector; and taking account of best international practice.</i>
Review. Strategic Action 4.1		Irish Timber Council	Delete reference to review of the “OptiLog report” as, in the decade since it first issued, the market for Irish timber has radically changed and sawmills have to respond to short lead in times. The report did not include the private sector which is now a significant source of supply.	As part of the development of a National Mobilisation Strategy the OptiLog report ...
Review. New Strategic Action 4.9		Roscommon County Council	Add text relating to good practice in roundwood haulage.	<i>Support measures, initiatives and awareness-raising aimed at achieving good practice in roundwood haulage.</i>
Review. Re-numbered Strategic Action 4.10		Roscommon County Council	Add stakeholder consultation text re identification of most suitable roundwood transport routes.	<i>In consultation with stakeholders, provide support measures and initiatives to identify the most suitable roundwood transport routes and their co-ordination with Local Authorities.</i>
Review. Chapter 5 Policy		Irish Timber Council	Add “competitive” to policy statement text.	To support the development of a <i>competitive</i> , innovative, value-added and market focused wood processing sector

Statement.				which provides sustainable solutions to a diverse portfolio of users in the construction, lifestyle, renewable energy, furniture and related markets.
Review. Strategic Action 6.1		Irish Farmers Association	Consider landowner involvement re establishment of National Deer Management Unit and development of deer management policy.	A full-time National Deer Management Unit (NDMU) to be established within DAFM to coordinate deer management policy development and implementation, <i>in consultation with stakeholders</i> , and to lead the development of a professional deer management culture in Ireland.
Review. Strategic Action 6.5		Irish Farmers Association	Consider increasing awareness of forest fires and thereby reduce the risk of fire occurrence.	The current forest fire warning risk assessment carried out by the Meteorological Office should be supported. DAFM in collaboration with the Local Authorities and relevant stakeholders to put in place guidance, <i>in order to increase awareness and reduce the risk of forest fires</i> , which would facilitate a co-ordinated system of fire plans (including dealing with fire outbreaks) for forest plantations and implement by 2014 the recommendations of the Land and Forest Fires Working Group.
Review. Strategic action 6.5		Mr. John Phelan (SG)	Add “including dealing with fire outbreaks” in context of DAFM guidance.	The current forest fire warning risk assessment carried out by the Meteorological Office should be supported. DAFM in collaboration with the Local Authorities and relevant stakeholders to put in place guidance, in

				order to increase awareness and reduce the risk of forest fires, which would facilitate a co-ordinated system of fire plans (<i>including dealing with fire outbreaks</i>) for forest plantations and implement by 2014 the recommendations of the Land and Forest Fires Working Group.
Review. Strategic Action 6.7		Mr. John Phelan (SG)	Consider adding “and analyse” to DAFM’s role re pest risk analysis and identification.	DAFM to continue to identify and analyse forest pest and disease risks from abroad and to maintain monitoring, biosecurity and phytosanitary measures to reduce the risk of entry and establishment of harmful non-native pests, diseases and invasive alien species and, depending on impending threats, consider the establishment of a Biosecurity Taskforce.
Review. Strategic Action 6.7.		Irish Farmers association	Establish a Biosecurity Taskforce to deal the increasing threat of pests and pathogens, with stakeholder representation, to review and advise on a strategic approach to forest health.	DAFM to continue to identify and analyse forest pest and disease risks from abroad and to maintain monitoring, biosecurity and phytosanitary measures to reduce the risk of entry and establishment of harmful non-native pests, diseases and invasive alien species and, depending on impending threats, <i>consider the establishment of a Biosecurity Taskforce.</i>
Review. Strategic Action 6.8		Irish Farmers Association	Outline the role of forest companies and consultants in providing guidance to match suitable well adapted	DAFM/COFORD to implement a decision support system (DSS) to facilitate the selection and planting of most appropriate species in the light of the potential impact of climate change <i>and to guide the forest</i>

			provenance to site.	<i>industry accordingly.</i>
Review. Strategic Action 13.3		Society of Irish Foresters	Feature Forest Service Annual Report on DAFM's website. The annual report should be published on the web as an interactive facility on the DAFM's website.	The Forest Service should re-instate a stand-alone Annual Report, providing a review of achievement versus specific goals in areas such as afforestation, timber production, environmental compliance and climate mitigation while also providing a statistical database for reporting and planning. <i>The Annual Report should also feature on DAFM's website.</i>
	Environmental Report. Chapter I	DAFM	Continuation of AA screening and AA application in relation to Natura sites.	The level of land use change envisaged in <i>Forests, Products and People</i> will require <i>the continuation of AA Screening</i> and <i>Appropriate Assessment in relation to Natura sites (SACs and SPAs)</i> , and the updating of Forest Service guidelines as outlined previously.
	Environmental Report. Chapter I	Inland Fisheries Ireland	Role of IFI in protecting, managing and conserving the inland fisheries resource and applicable freshwater species under Habitats Directive.	<u>Inland fisheries</u> Inland Fisheries Ireland is a statutory body which has the primary function of protecting, managing and conserving the inland fisheries resource. These functions extend to the following freshwater species which are listed under the Habitats Directive.

				<p>Species Annex of Habitats Directive Allis shad (<i>Alosa alosa</i>) II & V Brook lamprey (<i>Lampetra planeri</i>) II Killarney shad (<i>Alosa fallax killarnensis</i>) II & V Pollan (<i>Coregonus autumnalis</i>) V River lamprey (<i>Lampetra fluviatilis</i>) II & V Salmon (<i>Salmo salar</i>) (in freshwater only) II & V Sea lamprey (<i>Petromyzon marinus</i>) II Twaite shad (<i>Alosa fallax</i>) II & V</p>
	Environmental Report. Chapter II	DAFM	Clarification of Forest Service AA Screening and AA procedures.	In March 2012, the Forest Service formalised its application of AA Screening and Appropriate Assessment in accordance with the Habitats Directive, through the development of an Appropriate Assessment Procedure
	Environmental Report. Chapter III – Afforestation.	DAHG and EPA	Clarification that permission for afforestation, forest roads and aerial fertilisation is contingent on the FS AA procedure concluding that the project ,either singly or in	Where these areas contain or are adjacent to Natura 2000 areas, including Hen Harrier SPAs and SACs designated for Freshwater Pearl Mussel (FPM) ⁶ , permission for afforestation, forest roads or aerial fertilisation is contingent on the Forest Service arriving at a conclusion.

⁶ <http://www.agriculture.gov.ie/media/migration/forestry/grantandpremiumschemes/schemecirculars/AppendixDAAPregardingFPMAug12210812.pdf>

			combination, will not significantly affect the Natura site.	<i>through its Appropriate Assessment Procedure, that the project – either singly or in combination with other plans and projects – will not significantly affect the Natura site.</i>
	Environmental Report. Chapter III – Indicative Forest Statement	DAFM	Updated information of land availability for afforestation.	<i>More recent work by Teagasc (Appendix 1) provides an estimate of land suitable for afforestation by county. It should be noted that most of the land in the “wide use” and “limited use” categories, currently in grass/arable and wet grassland and shown as land suitable for afforestation net of conservation areas in the Farrelly and Gallagher report, is already under intensive agriculture (3,464,000 ha).</i>
	Environmental Report. Chapter III – Roundwood Harvesting	DAHG and EPA	AAP procedure continued in relation to roundwood harvesting in Natura sites.	Harvesting may also take place in areas designated under the Birds Directive as Hen Harrier SPAs and in SACs designated for Freshwater Pearl Mussel (FPM), where, following the application of its Appropriate Assessment Procedure, the Forest Service has determined that the project – either singly or in combination with other plans and projects – will not significantly affect the Natura site (see Chapter V re AAP).
	Environmental Report. Chapter IV	DAHG and DAFM	Further clarification of FS procedures in relation to protection of FPM and Hen Harrier.	<u>Freshwater Pearl Mussel</u> <i>The Freshwater Pearl Mussel (FPM) is a bivalve with a distribution range across northern Europe from Ireland to Russia, and across North America. For most of its life, the animal is a filter feeder, pumping large quantities</i>

				<p><i>of water through its siphons to trap food particles. There are two types of FPM in Ireland. The most common is <i>Margaritifera margaritifera</i>, which is present in 139 rivers across the country but in serious decline throughout its entire range. The second species is <i>Margaritifera durrovensis</i>, which is unique to Ireland and found only in the River Nore catchment where it is extremely rare and in danger of becoming extinct. Consequently, measures to conserve this species include a captive breeding programme.</i></p> <p><i>The Republic of Ireland is estimated to hold 46% of total European Union FPM population. Individual populations range from very small relic populations comprising a few remaining older mussels that have not successfully recruited for 50 years, to some of the largest populations of FPM in the world.</i></p> <p><i>The FPM is protected under Annex II and Annex V of Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (Habitats Directive). It is listed on Appendix 3 of the Bern Convention. It is also listed as critically endangered in the Republic of Ireland in the IUCN threat status of Irish molluscs. Under Irish law, the Wildlife</i></p>
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				<p><i>Act 1976, the Wildlife (Amendment) Act 2000 and the European Communities (Birds and Natural Habitats) Regulations 2001 (S.I. No. 477 of 2011), it is illegal to interfere with the FPM. Finally, there are 19 Special Areas of Conservation (SACs) for the species in Ireland, including 27 separate mussel populations.</i></p> <p><i>In September 2011, Irish authorities produced a Road Map for Conservation of the Freshwater Pearl Mussel in Ireland. The road map prioritises the conservation of FPM populations in eight of the 27 sub-basin catchments. The eight sub-basin catchments are: Bundorragha (Mayo), Currane (Kerry), Dawros (Galway), Caragh (Kerry), Kerry Blackwater (Kerry), Ownagappul (Cork), Owenriff (Galway) and Glaskeelan (Donegal).</i></p> <p><i>These eight priority catchments contain approximately 80% of the total known Irish FPM population (c.9.58 million individuals) and have been identified as having the greatest potential for the successful long-term conservation of the species. The strategy aims to achieve maximum conservation outputs for the restoration effort in terms of the</i></p>
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				<p><i>numbers of mussels and individual populations conserved and protected over the long term.</i></p> <p><i>The roadmap details measures for various sectors in the eight priority catchments. With regard to forestry, the road map proposes the production of detailed FPM Catchment Forest Management Plans (CFMPs) for each of the catchments. Forest activities such as afforestation, harvesting and road construction represent a potential source of sediment and nutrients (particularly phosphorus) to rivers. This is especially the case where forests are planted on peat or peaty soils. Consequently, the principal conservation measure set out in the CFMP is the control of forest management operations during the life-cycle of a forest, such as thinning, clearfelling, forest road construction and reforestation. The CFMP identifies the most appropriate options for different forest activities, based on the sensitivity of the site regarding sedimentation and eutrophication. This may result in some forest areas being identified for long-term retention, alternative silvicultural regimes such as continuous cover forestry, the establishment of</i></p>
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				<p><i>protective forests (predominantly native woodland), or no replanting in selected areas.</i></p> <p><i>The CFMPs provide a structure for forest owners and registered foresters to assess the sensitivity of an individual site in relation to FPM, and to select from a range of presented options the most appropriate approach to the project in question which best reflects that level of sensitivity. By following this process, applicants and registered foresters can develop applications for Forest Service approval/licensing which take account of the risk to FMP populations. The information provided may then enable the Forest Service to arrive at the conclusion after AA Screening that the project, alone and in combination with other plans and projects, will not have a significant impact on FPM (or other qualifying interests of the NATURA site).</i></p> <p><i>If AA Screening results in the Forest Service arriving at the conclusion that the project may have a significant effect, or where uncertainty exists (which might arise in situations where the above process is not followed by the applicant and registered forester), an Appropriate Assessment is</i></p>
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				<p><i>necessary and the applicant will be required to submit a NATURA Impact Statement (NIS) to facilitate that process. Therefore, applications to the Forest Service for approval/licensing within the priority eight FPM catchments can only advance where: (i) the applicant and registered forester have assessed individual site sensitivity and have tailored the proposed project accordingly (either at initial application stage following the above process, or through a NIS, with its associated cost and time delay); <u>and</u> where (ii) the Forest Service is satisfied that the project will have no significant effect on the NATURA site.</i></p> <p><i>It is intended that this approach, coupled with proactive engagement with forest owners and foresters, and the availability of proposed incentives primarily under the Native Woodland Scheme (to establish new protective native woodland and to convert existing conifer forest to native woodland along watercourses), will minimise the potential for impact arising from forestry, and will, over time, change the profile of forest cover within the catchments in terms of species mix and silviculture, to</i></p>
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				<p><i>contribute proactively to the long-term protection of the FPM.</i></p> <p><i>Under the Native Woodland Establishment (NWS) Scheme, landowners can avail of grants to develop new native woodland. The NWS scheme document highlights the potential to develop native riparian woodland and it specifically notes that projects focussed on creating significant areas of native riparian woodland primarily to protect a designated riparian or aquatic habitat or species (e.g. Freshwater Pearl Mussel) may also be eligible for funding. Such projects to be examined, on a case-by-case basis, by the Forest Service at a national level, with a focus on site suitability, relative strategic merit and other factors.</i></p> <p><i>In a meeting with the European Commission in September 2011, a draft pilot plan for forestry in the Caragh FPM Catchment was presented by the Forest Service. This plan has been used as a template for the completion of a single CFMP which will include all eight catchments. Draft text for the first four catchments is nearing completion and draft text for the remaining catchments will be finalised early in the New Year. Engagement of forest stakeholders in the development of the CFMP has</i></p>
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				<p><i>commenced, and will intensify once draft text is finalised and prepared for consultation.</i></p> <p><u><i>Hen Harrier</i></u></p> <p><i>A recent COFORD Connects Note states “Hen Harriers are listed, along with 32 other rare and vulnerable bird species, on Annex 1 of the Birds Directive (79/409/EEC). This instrument legally requires Ireland to ensure their protection and to designate a suite of the most important sites for this species as SPAs, or else face heavy fines in the European Court. Over recent centuries a number of raptor species have been lost from the island of Ireland, and the Hen Harrier (Figure 10), one of our rarest birds of prey, is now classed as vulnerable here and at a European scale. Traditionally it used heather moors for nesting during the breeding season and foraged in the surrounding landscape which included extensive farmland. Due to the depletion of significant proportions of suitable habitat from the Irish landscape by afforestation and reclamation, they have adapted to nesting in young conifer plantations and are now frequently associated with these</i></p>
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				<p>forests.”</p> <p><i>The conversion of unimproved/unenclosed open moorland and heath/bog habitats to forestry and other land uses such as agriculture and windfarms, can negatively affect Hen Harriers by removing nesting and foraging habitats in the long term. There is also some evidence to indicate that nests located in second rotation pre-thicket forests may be associated with low levels of breeding success. In addition, other forestry operations such harvesting and road construction can cause disturbance to nesting harriers, resulting in nest abandonment. Forest expansion and operations therefore need to be carefully planned in SPAs that have been designated for Hen Harrier protection.</i></p> <p><i>Since the SPAs were designated in 2007, afforestation has been severely restricted and confined to improved agricultural grassland within each SPA, with no afforestation permitted on unimproved land such as open moorland and heath/bog habitats.</i></p> <p><i>More recently, approval for afforestation within these SPAs has been curtailed. As communicated to</i></p>
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				<p><i>the forestry sector by Forest Service Circular 13/2013 (August 2013), the National Parks and Wildlife Service (NPWS) of the Department of Arts, Heritage and the Gaeltacht is commencing the development of a Threat Response Plan (TRP) for the conservation of Hen Harrier, as provided for under Regulation 39 of the European Communities (Birds and Natural Habitats) Regulations 2011 (Statutory Instrument No. 477 of 2011). The plan is expected to take approximately 2 years to complete. Forestry will form an important element of the plan, given the significance presence of this landuse in relevant SPAs. The Forest Service will be liaising closely with the NPWS in its formulation of the TRP, on aspects relating to afforestation, felling and replanting with a view to wider forest restructuring, and will be consulting with key forest stakeholders during this process. Until the TRP is completed and the measures involving forestry are clear, the Forest Service is not in a position to issue approvals for afforestation within Hen Harrier SPAs.</i></p> <p><i>Afforestation applications outside of Hen Harrier SPAs continue to be</i></p>
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				<p><i>subjected to the Forest Service Appropriate Assessment Procedure, with individual AA Screening and follow-up Appropriate Assessment applied, as required.</i></p> <p><i>Forest management operations, including thinning, felling and forest road construction, still continue within Hen Harrier SPAs, subject to Forest Service approval under the relevant legislation. Due to the possibility of disturbance to breeding birds arising from associated operations, the Forest Service operates a procedure developed with NPWS and embedded within the Forest Service AAP, whereby operations within designated 'Red Areas' centred on known nesting sites are not permitted within the Hen Harrier breeding season. These restrictions also apply to sections of Red Areas extending beyond the SPA boundary. The procedure is set out in Appendix C ('AAP requirements regarding Hen Harrier SPAs, felling and other disturbance operations') of the Forest Service AAP Information Note.</i></p>
	<p>Environmental Report. Chapter IV- Former planting now considered unsuitable.</p>	Inland Fisheries Ireland	<p>Management of peat areas currently afforested which are to be considered for reforestation.</p>	<p><i>This would include carefully considering options other than full reforestation, particularly where there are strong indications that full reforestation could contribute to a delay in a recovery of surface water to good status.</i></p>
	<p>Environmental Report. Chapter</p>	DAHG	<p>Elaboration of FS Appropriate Assessment Procedures.</p>	<p><i>Regarding Natura sites (SACs and SPAs), the Forest Service operates an</i></p>

	V			<p><i>Appropriate Assessment Procedure (AAP) in relation to all forestry operations requiring its consent, i.e. afforestation, forest road construction, felling (thinning and clearfell/replanting) and aerial fertilisation. Under the AAP, individual projects are screened to assess whether or not there is the possibility for a significant effect on a Natura site. Where the possibility is identified, or where uncertainty exists, the proponent of the plan is required to submit a Natura Impact Statement and the Forest Service undertakes the appropriate assessment. The appropriate assessment is undertaken to assess the nature of possible impacts, and the effectiveness of any mitigation measures proposed. A project can only receive approval if the Forest Service has determined that it will not significantly affect the Natura site. Full details on how the Forest Service AAP operates are set out in the Forest Service Appropriate Assessment Procedure Information Note (consolidated version March 2013)</i></p> <p>http://www.agriculture.gov.ie/media/migration/forestry/publications/ForestServiceAAPInformationNoteMarch12</p>
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				<i>CONSOLIDATED060312.pdf3</i> and the <i>Forest Service Appropriate Assessment Procedure Forestry Inspector's Manual (September 2013)</i> .
	Environmental Report. Chapter VII – page 52 final paragraph.	DAHG	Clarification that reference is to the Teagasc report on soil types suitable for afforestation and not to this Environmental Report itself.	This That analysis was limited to soil types only and did not address designated areas unavailable or with limited application for afforestation.

Section 4 - Alternatives considered and assessed, and preferred alternatives selected.

Alternatives were considered and assessed at the following stages of the formulation of the Review:

1. As part of the work of the Stakeholder Group discussions took place on alternatives related to the Strategic Actions in each chapter.

The alternatives are described in Chapter VII of the Environmental Report in relation to

- (a) expansion of the forest resource area,
- (b) forest management and silviculture systems,
- (c) forest management planning,
- (d) environment and public goods,
- (e) non-wood benefits,
- (f) forest protection,
- (g) education, training and research, and
- (h) legislation.

The assessment of the alternatives is also described in Chapter VII of the Environmental Report.

2. Alternatives were also considered as part of the initial stakeholder consultation, in response to the scoping consultation phase and following the public consultation round. These alternatives were also assessed by the Stakeholder Group.

Section 5 Monitoring

DAFM has the overall responsibility to monitor the level of implementation of the Strategic Actions set out in the Review, and in this regard will establish a monitoring mechanism, which will include indicators and targets, where appropriate.

Strategic Action 9.1 of the Review recommends the establishment of a Forest Council, representative of the forest and related sectors, with a permanent secretariat and three subordinate committees (a) research and sectoral development, (b) schemes and measures and (c) environment, which would have the responsibility for ongoing monitoring and reporting of progress on policy implementation against agreed indicators of achievement and providing advice on the updating of policy and or strategic measures.

In addition, Chapter VIII of the Environmental Report sets out monitoring measures envisaged as part of the Review. These include

1. The Forest Service Appropriate Assessment Procedure.
2. Environmental audits of forest operations by the Forest Service Inspectorate.

3. Water quality monitoring in forest catchments by the EPA as part of the implementation of the Water Framework Directive.
4. Assessment of the status of EU protected habitats and species in Ireland by DAHG under the Habitats Directive.
5. Floral biodiversity and the level of native tree species cover as well as carbon stock changes assessed under the National Forest Inventory.