

Greenbelt Ltd

To whom it may concern,

There is an absolute imperative for the legislation governing the Forestry Appeals Act to be urgently changed.

Firstly I, as CEO of Green Belt want to point out that society should have the right to submit an appeal and should have a forum through which it can express legitimate concerns.

This forum, namely the Forestry Appeals Unit, should be able to address these appeals in a fair, transparent and **TIMELY**, manner.

I am not against appeals.

However, swamping an appeals unit with appeals with the sole intention of creating and perpetuating a backlog of cases just to make a point or indeed to bring a sector to it's knees is wrong and completely rows against the supposed sustainability principles which the appellants supposedly hold dear (true sustainability looks at 3 pillars equally, environmental pillar, social and economic).

Currently the appeals act is being abused and the outcome is;

- There are long delays in issuing licences causing interested parties to turn away from forestry to other options
- Local interests are preventing neighbours from exercising their rights to plant or sell land by appealing their decision to plant in the certain knowledge that cases will sit for 15 months plus in the appeals unit.
- I regularly hear cases of absolute hardship inflicted on people who want to sell or plant land but their application is "stuck in appeals"
- The FAC cannot cope with the workload placed upon it by 2 to 3 repeat appellants
- People livelihoods are at stake
- Forestry companies are looking at a significant drop in turn over
- Forestry companies are looking at redundancies
- Irish forest owners cannot cut their own crop, cannot bring this crop to market and saw mills are close to closing.
- Ireland is importing "high risk" logs from the continent to keep the mills working, the possibility of introducing bark beetle with these logs is high, are we going to destroy another crop of trees like we destroyed our ash crops?

The proposed changes are not extreme;

1. Introduce a fee to submit an appeal, an extremely reasonable request. This might stop the submission of multiple appeals across multiple sites.
2. Allow numerous appeals to be heard at the same time (i.e. the chair should not need to sit at every hearing, this is like saying the Pope is the only person who can say Mass!!)

3. FAC must have discretion around hearing an appeal even if an appellant originally requested an oral hearing. Postponing ones attendance cannot go on forever. Also; in these days of COVID, cases should not be kicked down the road just because oral hearings are not possible.
4. Appellants should have a meaningful association with the case.

As CEO of Ireland's largest afforestation company I strongly urge that the legislation is changed as drafted and changed ASAP.

If the suggested changes are not introduced the forestry sector will fall and thousands of rural jobs will fall with it.

Kind Regards,
Green Belt Ltd

