



An Roinn Ealaíon, Oidhreachta,
Gnóthaí Réigiúnacha, Tuaithe agus Gaeltachta

Department of Arts, Heritage,
Regional, Rural and Gaeltacht Affairs

Our Ref: DP00019/2017

(Please quote in all related correspondence)

24 March 2017

Forest Service,
Department of Agriculture, Food and the Marine,
Johnstown Castle Estate,
Co. Wexford

Via email: alan.sheridan@agriculture.gov.ie

Re: A review of Forests, products and people, Ireland's forest policy – a renewed vision

A Chara,

The Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs refers to the correspondence of 10th February 2017 from the Forest Service of the Department of Agriculture, Food and the Marine (DAFM) in relation to the planned review of 'Forests, products and people, Ireland's forest policy – a renewed vision'. It is understood that this review is being carried out by the COFORD Forest Policy Review Group, following the initial publication of this policy document in 2014.

Outlined below are heritage-related observations/recommendations of the Department under the stated headings.

Archaeology

Since the publication of the COFORD report in 2014, the suite of guidelines relevant to the environmental implications of afforestation has been amalgamated, although they have not as yet been published. The approach to archaeology and built heritage to be outlined in that document should be referred to in the proposed COFORD document.

In the discussion of Environment and Public Goods, (chapter 3 of the 2014 document), reference is made to the contribution archaeological monuments might make to the provision of public goods and to tourism and recreation in private forests, as well as on the Coillte estate. The Department would encourage this approach and would be in a position to advise as to how this might be achieved in such a way as to avoid any breaches of National Monuments legislation. In general, it would be expected that the notification requirement of section 12(3) of the National Monuments (Amendment) Act, 1994 would be relevant but in a smaller number of cases national monuments subject to Ministerial consent requirement may be involved.

Strategic action 3.10 of the Environment and Public Goods chapter refers to the working group charged with introducing guidance and criteria for the management of peat areas. As peatlands have repeatedly been proven to have increased archaeological potential, it will be important that the Department should be a party to the compilation of guidance on the treatment of these areas.

There seems to be a suggestion on page 4 of the 2014 document that if a GIS layer showing archaeological monuments were included on the Indicative Forestry Statement (IFS) national map,

this would facilitate easier identification of areas suitable for afforestation. Information regarding the location and nature of archaeological monuments is available to private sector foresters via INET, to the Forest Service via IFORIS and to the general public through this Department's online Historic Environment Viewer. It is not clear that the inclusion of information relating to built heritage on the IFS national map would contribute significantly to the identification of land that is suitable for afforestation and the existing consultation between the Forest Service and the Department would in any case, still take place.

Nature Conservation

From a nature conservation perspective, critical among the considerations for forest policy in Ireland are:

- the likely significant effects of forest policy on European (Natura 2000) sites, noting that adverse effects on the integrity and conservation objectives of European (Natura 2000) sites should not result from forest plans, projects or operations alone, or in combination with other plans and projects.
- the likely significant effects of forest policy on the environment, including on biodiversity, flora and fauna, noting that adverse effects on nature conservation sites, and natural habitats and protected species should not result from forest plans, projects or operations. Our two Departments are working together on issues around conservation of pearl mussel, hen harrier and curlew, and these species continue to be of concern.

The Department outlined these considerations for the Forest Service in its submissions on the Forestry Programme 2014 – 2020 when that programme was in preparation and subject to associated environmental assessments (i.e. Strategic Environmental Assessment (SEA) and appropriate assessment (AA)). These submissions are appended for the COFORD Forest Policy Review Group's information and consideration in the context of the current review.

Forestry and Peatlands

Ireland's National Peatlands Strategy published in 2016

(<https://www.npws.ie/sites/default/files/publications/pdf/NationalPeatlandsStrategy2015EnglishVers.pdf>)

sets out a number of principles in relation to the management of Ireland's peatlands including that they will continue to be used for many purposes including forestry and that their future management will ensure the protection of threatened peatland habitats and associated species in compliance with all relevant environmental law. The Department welcomes the commitments made by DAFM in 'Ireland's forest policy – a renewed vision' in relation to the establishment of a working group to introduce guidance and criteria for the identification and future management of peat areas currently afforested which are to be deforested to mitigate continued environmental degradation and to give guidance on future afforestation of peat soils.

The National Raised Bog Special Areas of Conservation (SAC) Management Plan 2017-2022, due to be published in the coming period subject to government approval, sets out a series of measures to restore designated raised bogs in Ireland in order to meet national conservation objective targets.

The National Parks and Wildlife Service (NPWS) looks forward to working with all relevant stakeholders, including the Forest Service and Coillte, regarding the implementation of conservation measures proposed in the Plan. NPWS is available to meet the group to discuss the content of these submissions if it would assist.

You are requested to send further communications and any requests for clarification to this Department's Development Applications Unit (DAU) at manager.dau@ahg.gov.ie (team monitored); if this is not possible, correspondence may alternatively be sent to:

The Manager
Development Applications Unit (DAU)
Department of Arts, Heritage and the Gaeltacht
Newtown Road
Wexford
Y35 AP90

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Joanne Lyons
Development Applications Unit
Tel: 053-9117447

Encl:

- Pre-planning response to Department of Agriculture, Food and the Marine of 13/06/14 regarding the AA Screening Report and SEA Scoping Report for Ireland's Forestry Programme (G Pre00191/2014)
- Pre-planning response to Department of Agriculture, Food and the Marine of 13/10/14 regarding the SEA of the Draft Forestry Programme 2014-2020 (G Pre00364/2014)