



IRISH TIMBER GROWERS ASSOCIATION

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Irish Timber Growers Association submission on Carbon Farming Framework for Ireland

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The Irish Timber Growers Association (ITGA) was established in 1977 and is the national representative body of private woodland owners in Ireland. The membership of the Association mirrors the wide range of different timber growers in the country and current membership includes farm forest owners, forestry co-operative members, native woodland owners, forestry investors and forestry pension funds. This wide range of membership allows the Association take a broad view of the industry and issues facing the sector.

The Irish Timber Growers Association welcomes the opportunity to make this submission to the Department of Agriculture, Food and the Marine (DAFM) on a Carbon Farming Framework for Ireland.

ITGA note that DAFM in the Guidelines on the Carbon Farming Framework consultation states that the aim of the framework is *'to support putting farmers, landowners, and foresters at the centre of meeting our National Climate objectives'* and that the framework *'aims to increase the ambition and participation of our land managers in the areas of carbon removal, emission reductions, and ecosystem services.'* The Association support this prioritisation of timber growers and foresters within the Carbon Farming Framework. It is important to acknowledge that forest owners and foresters are already, and have always been, at the centre of providing carbon removals and ecosystem services and have been doing so successfully without receiving appropriate acknowledgement or reimbursement for the provision of these public goods.

For the past decade significant difficulties have been encountered by forest owners and foresters in providing these services effectively. The administration, paperwork and bureaucracy required in securing forestry licences, for what most countries consider normal forest management, and the well documented delays in obtaining afforestation licences in Ireland are major obstacles to a future Carbon Farming Framework and should be addressed as an integral part of this process. It should be noted that afforestation is specifically included in the scope of the EU Regulation for establishing a certification framework for carbon removals (2022/0394) and an important aim of the Framework should be to facilitate a user friendly and prompt afforestation process.

The Irish Timber Growers Association (ITGA) have made the case that woodland creation and sustainable forest management should be a source of income for growers through their carbon storage and their capability to provide a myriad of ecosystem services. For several years, ITGA have called for a Forest Carbon Code for Ireland to provide a quality assurance standard for carbon capture through tree planting and related ecosystem service projects that can generate independently verified carbon or ecosystem services units. Such units can then generate important revenue for growers from corporates and others who wish to show mitigation of carbon emissions through Voluntary Carbon Offsets with added ecosystem services benefits. Such initiatives will facilitate carbon removals at scale, particularly where more rapidly sequestering species are planted, while simultaneously generating an economic return for the landowner and the State and providing rural employment. The UK Woodland Carbon Code, launched back in 2011, by the Forestry Commission, is just one example of such a scheme. These are models that the Carbon Farming Framework should consider in developing an Irish Forest Carbon Code.

A UN background analytical study¹ on the contribution of forests to the achievement of Sustainable Development Goals, labelled these forest ecosystem services as, ‘Untapped Potential’, outlining, *‘The world’s forest ecosystems provide critical and diverse services and values to human society. As primary habitat for a wide range of species, forests support biodiversity maintenance and conservation. Forest growth sequesters and stores carbon from the atmosphere, contributing to regulation of the global carbon cycle and climate change mitigation. Healthy forest ecosystems produce and conserve soil and stabilize stream flows and water runoff—preventing land degradation and desertification and reducing the risks of natural disasters such as droughts, floods, and landslides. Forests also serve as sites of aesthetic, recreational, and spiritual value in many cultural and societal contexts, and contribute to poverty eradication and economic development by providing food, fibre, timber, and other forest products for subsistence and income generation.’*

This same study also states, *‘Ultimately, countries must establish regulations and incentives which properly acknowledge and account for the values provided by forest ecosystems to society, and which direct sufficient finance to safeguard these services over the long-term for sustainable development.’* The study concludes that *‘bold action will be necessary to scale-up this progress in order to fully achieve the 2030 Development Agenda goals.’*

Many studies have been undertaken over the years to establish how many hectares we should be planting in Ireland to meet the ever-increasing demand for timber and the demand for climate mitigation through carbon sequestration. All reports, including a Series of COFORD Statements², agree that Ireland should be planting more than the 8,000 Ha per annum target set in the Climate Action Plan and in the new Forestry Programme 2023 -2027. Various acknowledged experts and researchers, such as Dr David Styles, of University of Galway, believe that this target should be as high as 20,000 Ha per annum and should focus on commercial forestry³. Especially given the fact that planting rates over the past number of years have fallen to as low as 2,300 Ha per annum. The use of timber in construction to replace high emission manufacturing of concrete and steel supports the case for commercial forestry and

¹ https://www.un.org/esa/forests/wp-content/uploads/2018/05/UNFF13_BkgdStudy_ForestsEcoServices.pdf

² <http://www.coford.ie/media/coford/content/COFORDSTRATEGYFULLFINALREPORTJAN2022240122.pdf>

³ <https://www.farmersjournal.ie/more/forestry/turning-a-forestry-vision-into-reality-779945>

timber production. Faster growing conifer species also sequester and lock up carbon at a significantly faster rate than slower growing broadleaved species and will therefore be more effective in achieving Ireland's Climate Action Plan targets. The Carbon Farming Framework must reflect and prioritise growing conifers to sequester larger amounts of carbon more rapidly and at the same time producing timber for construction to substitute for more emissions producing concrete and steel building materials.

Studies have been undertaken to investigate various planting scenarios, afforesting land to substitute for beef cattle and sheep livestock systems and highlighting how much carbon can be abated by doing so over the rotation of a forest crop, showing the critical role economically sustainable forests can play in meeting the urgent need to tackle rising agricultural emissions.⁴ Similarly, studies are being undertaken to quantify ecosystem services in order to place a value on these services.⁵

A recent Study on Circular Wood Use⁶, advocates '*cross-sectoral integration of sustainability objectives*' and '*focus on more circular use and recycling of wood as part of a coherent decarbonisation strategy.*' Given the predicted rise in consumption of processed wood products forecast by 2050, there is '*considerable scope to increase the sustainability of forestry value chains and increase their contribution to achieving net-zero greenhouse gas (GHG) emissions, in alignment with Paris Agreement goals.*'

DAFM '*Guidance to inform Consultation on the development of a Carbon Farming Framework for Ireland*', asked consultees to consider 7 key points and ITGA comments on these key points are outlined below:

1. Feasibility of emissions reductions/avoidance; carbon removal; co-benefits of biodiversity and ecosystem restoration.

All of the above can be delivered through an adequately resourced Forestry Programme, including afforestation and also improvement measures for existing forests. All proposals in the Carbon Farming Framework must be based on the best forestry options for the landowner, taking into account the location, soil type and forest/landowner objectives, including economic sustainability and value creation. The Framework should avoid promoting and focussing primarily on native species and accommodate our more rapid carbon sequestering conifer species. The Carbon Farming Framework must embrace economically sustainable forestry, which is also the most rapid and effective terrestrial carbon sequestration tool Ireland can deploy in meeting its climate change targets.

2. Review and establishment of governance structures.

The Association have called for the development of a Forest Carbon Code or Standard that would facilitate the sale of Voluntary Carbon Offsets from private forests. This would allow forest owners to attract additional revenue, over and above the grants and premium available in the new Forestry Programme itself. It would ensure that forestry is made a more financially attractive option for landowners and farmers. The

⁴ <https://www.sciencedirect.com/science/article/pii/S0301479720304576>

⁵ <https://www.for-es.ie/>

⁶ 'Circular wood use can accelerate global decarbonisation but requires cross-sectoral coordination'
<https://www.nature.com/articles/s41467-023-42499-6>

administrative burdens in our afforestation procedures are major obstacles to a future Carbon Farming Framework and should be addressed as an integral part of this process specifically under this heading in reviewing and establishing governance structures.

COFORD recently recommended in their series of COFORD Statements on Climate Change Mitigation that, 'It is timely to explore the issues around the potential introduction of a voluntary carbon code in Ireland.' ITGA publicly welcomed this proposal and highlighted the necessity to progress this in tandem with the commencement of the new Forestry Programme.

As the Department of Agriculture, Food and the Marine's name implies, the focus of the Department is perceived to be on agriculture and food production. Forestry does not feature in the Department's name which can be seen to reflect the often negative perception of forestry in the farming community. This should be addressed as part of the Carbon Farming Framework.

Forestry is our best terrestrial carbon sequestration option to combat both climate change and also to enhance biodiversity, yet there is a perceived continued lack of priority within the Department to champion forestry. The Association and the wider forestry sector has calling for new governance structures to achieve our ambitious new Forestry Programme targets and for the establishment of a Forestry Development Agency to address the sectors ongoing issues, this should be addressed as an integral part of this the Carbon Farming Framework process.

3. Credibility of realised mitigation.

The nature of forestry is that it is long-term. Even a single rotation of a conifer crop is at least 30-40 years. The carbon sequestration abilities of forests have been well researched and studied and are well documented and the benefits of forests for the economy, environment and society go far beyond the capturing of carbon. The possibilities for timber use in construction are extensive and would go a long way in avoiding emissions associated with concrete and steel production, and again are long-term. Carbon is locked into timber products and has a longer lifespan when being re-used as part of the circular economy.

4. Monitoring, Reporting & Verification

For those familiar with forest certification and carbon schemes, such as the UK Woodland Carbon Code, monitoring, reporting, and verification are part and parcel of recognised certification schemes. The key is to draft/develop, appropriate standards that outline how this is being undertaken, or adapt existing standards. There are various UK and EU schemes and standards available: we can use these, adapt them, and learn from existing standards.

5. Availability of necessary skills and expertise

ITGA have for many years advocated for forestry to be taught in agricultural colleges as an agricultural land use model, rather than an alternative (and perceived threat) to traditional farming models.

6. Funding Framework.

The key to uptake in any scheme is appropriate promotion and funding, largely through EU/State funding, but could also be part-funded by industry and through a consumer price mechanism.

Agricultural schemes should be designed in such a way that they complement each other to ensure that afforestation is regarded as an equal opportunity for farmers and as a comparable land use option, not as an alternative (and perceived threat) to farming. The results of ongoing research, such as the FOR-ES work, into quantifying and qualifying ecosystem services should be used to reward farmers and landowners appropriately for the ecosystem services they provide. Schemes such as WEF are welcomed. These schemes need to be scaled up and expanded beyond Native Woodland planting also employing innovative technologies to demonstrate carbon capture and ecosystem services provided by particular woodlands.

7. Ensuring fairness.

There is a perception among farmers that planting their land with trees is a transition out of agriculture. This goes back to item 2 above, and the fact that forestry is not perceived or acknowledged by the Department of Agriculture, Food and the Marine in its name as an agricultural activity. Those farmers who have planted their lands as part of the earlier schemes in the 1980's and are now reaping the rewards of that early decision, will often comment on the fact that their decision to plant was often greeted with animosity by the farming community. If this perception is not addressed and if forestry is not accepted as a viable farming enterprise, it will be very difficult to 'ensure fairness'.

There is another type of fairness that is potentially not being addressed in this DAFM Carbon Farming Framework consultation document. The fairness of being allowed to plant the right tree in the right place for the right reason. Too much emphasis is being placed on our small number of native tree species and the word timber does not feature sufficiently in Government forestry campaigns. Timber production provides the critical income stream, but only when you plant the right tree in the right place and are allowed to manage this sustainably in accordance with best forestry practice. Economically sustainable commercial forestry must be central to the Carbon Farming Framework to 'ensure fairness' for landowners and farmers who wish to generate a return from afforestation while sequestering carbon and providing public goods.

ITGA agree with the conclusion of the research being undertaken in relation to circularity that in order to gain carbon neutrality by 2050, we have to address reductions in carbon emissions on many fronts, forestry is the best land-based option to address climate change, biodiversity enhancement and provision of ecosystem services and this should be facilitated rather than the forestry sector having to fight for every tree they wish to plant. We must endeavour to scale up our afforestation programme by ensuring economically sustainable forestry for landowners and the State, while sequestering carbon at a rapid pace, thus facilitating the success of the Carbon Farming Framework in achieving our Climate Action Plan targets.

The Irish Timber Growers Association (ITGA) through its work and various information and representation initiatives is committed to supporting the forestry sector and its critical role in the sustainable economic, environmental and social development of Ireland. ITGA is actively

supporting and promoting forestry's contribution to forest owners and the State and recognises the significant importance of developing and implementing a comprehensive and robust Carbon Farming Framework to support our Climate Action Plan, National Biodiversity Action Plan, our new Forestry Programme, amongst others.