



# IRISH TIMBER GROWERS ASSOCIATION

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## Irish Timber Growers Association submission to the Agri-Food Strategy to 2030

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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, private woodland estates, forestry investors and forestry pension funds. This wide range of membership allows the Association to 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 Agri-Food Strategy to 2030.

The Association will focus its submission specifically on the forestry and timber sector and the contribution forestry, encompassing all tree planting, including agro-forestry, can make to the Agri-Food Strategy. This submission mainly focuses on GOALS 1-4 of MISSION 1.

### ➤ **Agri-Food Strategy to 2030 should set afforestation targets:**

ITGA welcomes that the Agri-Food Strategy to 2030 mentions *'the significant role forestry has to play'* throughout the proposed strategy. However, it has failed to set targets for afforestation in the 'High-level targets for 2030' (p9) and only mentions *'increasing afforestation'*.

GOAL 1 (MISSION 1) – Action 1 calls for the immediate implementation of the Ag-Climatise Roadmap. ITGA welcomes this, where this also includes the immediate implementation of Ag-Climatise Action 14:

*'Action 14: Increase afforestation levels and maximise the contribution of existing forests to climate change mitigation and adaptation*

- *Increase afforestation levels to 8,000 ha per year.'*

Where the Agri-Food Strategy to 2030 calls for the immediate implementation of the Ag-Climatise Roadmap, it should endorse this afforestation target of 8,000 ha per year and include this in the High-level targets for 2030 (P9).

Despite the fact that past Agri-Food strategies acknowledged that *'the role of Irish forests is key to the country meeting its international climate change targets'* and that

*‘This means that the decline in planting levels in recent years will need to be reversed.’* (Food Harvest 2020) and included the aim *‘Maximise uptake of allocated funding for the Forestry 2014-2020 Programme to help increase afforestation levels to capture carbon, and sustain the production of forest-based biomass to meet renewable energy targets.’* (Foodwise 2025), there has been no improvement in planting levels since these reports were published and the Agri-Food Strategy to 2030 has again missed an opportunity in failing to set afforestation targets and not integrating forestry with the agricultural sector.

While there are numerous references in the Strategy to Ag-Climatise, which does set a target for afforestation of 8,000 ha per annum in *‘Action 14’*, there are no references to this section of Ag-Climatise in GOAL 4 (MISSION 1).

The current low planting levels will have significant repercussions for Ireland’s ability to meet its international climate change targets in addition to its negative effect on renewable energy targets. Also, the decline in planting will have serious repercussions on the country’s future supply of timber for processing, ultimately affecting exports, employment and the rural economy, as well as its carbon sequestration abilities. The shortfall in achieving our planting targets now will have more significant knock on effects for our industry and for Ireland in future years. As an export dependent country, the Irish sawmill and panelboard sector have achieved remarkable success in recent years and are exporting most of their finished products. Over 70% of sawn and over 80% of panelboard products which were produced in Ireland are exported. To date, the main limiting factor to increasing our exports of finished timber and panelboards was the supply of raw material (roundwood), which can only be addressed by increasing afforestation

➤ **Agri-Food Strategy to 2030 should emphasise the role of forestry in carbon sequestration:**

The role of forestry in relation to carbon off sets or carbon sequestration in GOAL 1 (MISSION 1) Actions 4b and 4d (p52) could be further emphasised. Action 4d calls for *‘The introduction of an independent, robust, trustworthy certification mechanism that provides high quality monitoring, reporting and verification’*.

In January 2021, ITGA called for carbon payments for landowners who plant trees through the establishment of a verifiable Forest Carbon Code. Such a Carbon Code in line with the now well-established UK Woodland Carbon Code should be prioritised.

The Agri-Food Strategy to 2030 acknowledges the role of forestry in carbon sequestration, yet it only acknowledges its potential as *‘make a very significant contribution to improving the Irish environment, particularly through carbon sequestration and storage.’* (p85).

There are numerous references to the Farm to Fork (F2F) strategy, but no references to the role forestry could play in the “new green business model” referenced in the EU Farm to Fork strategy.

➤ **Prejudicial language in relation to forestry in the Agri-Food Strategy to 2030 should be removed and the focus on positive contributions of forestry emphasised:**

The manner in which forests are referenced in Action 7 of GOAL 2 (MISSION 1), (P57): Restore and Enhance Biodiversity, of the Agri-Food Strategy is highly prejudicial:

*7. Ensure that farms and forests do not contribute to habitat destruction and isolation, and also protect features of cultural heritage and traditional landscapes. This should include better enforcement of existing environmental rules, including strengthened implementation of the Environmental Impact Assessment (EIA) Agricultural Regulations in order to avoid habitat removal and loss of carbon pools.*

ITGA objects strongly to the inclusion of the above in the Ag-Food Strategy and feels that Action 9 of GOAL 2 implies the same without the negative connotations:

*9. Build on the measures introduced to protect and foster greater biodiversity in forests such as minimum broadleaf composition, setbacks from watercourses and archaeological features, Areas of Biodiversity Enhancement and the Woodland Environmental Fund, whilst recognising the need to maintain their economic viability as forests with rich biodiversity offer significant public goods and societal benefits.*

The call for implementation of the Mackinnon report in Action 1 under GOAL 4 (MISSION 1) (P62) is welcomed, but ITGA would strongly urge the removal of the words ‘*and reducing deforestation.*’ This is legislated for in the Forestry Act, 2014 and adding this as an Action in the Agri-Food Strategy is superfluous.

Also, in its current draft, Action 5 of GOAL 4 (MISSION 1) (P63) shows the same prejudice as it appears to imply that ‘non-compliance’ by the forestry sector with environmental requirements and water objectives is the root cause of the licensing problem, which is a misrepresentation. Without any references elsewhere in the Agri-Food Strategy to Ireland’s River Basin Management Plan 2018-2021, the Blue Dot Catchments Programme and the LIFE-IP Waters of Life Programme, it gives the impression that only the forestry sector has to comply with and/or participate in these programmes.

*Action 5. Implement Project Woodland, to ensure that the licensing system for tree felling, thinning, roads and afforestation provides a predictable and efficient service for applicants, while complying with environmental requirements and those measures listed in the Forests & Water Achieving Objectives under Ireland’s River Basin Management Plan 2018-2021. Active participation should also continue in the Blue Dot Catchments Programme and the LIFE-IP Waters of Life Programme.*

This lack of understanding or appreciation of forestry’s wide range of environmental and social contributions is also evident from the SEA Non-Technical Summary. The SEA highlights that [an unspecified] ‘*Number of farmers and other primary producers participating in schemes conservation schemes*’, yet does not mention the fact that over half of the Irish Forest estate is annually submitted for auditing carried out by an accredited certification body against one or both of two agreed international forest management certification standards, ensuring that these forests are sustainably

managed in accordance with national and international legal, social and environmental requirements. Instead, it only highlights forestry in terms of pressures on water quality from forestry activities, pressures on cultural heritage from extensive afforestation and limited gender diversity. Forestry is completely ignored in the SEA as an area of strength when it comes to human health and mental wellbeing, as an area of strength in terms of flood mitigation, or as an area of strength when it comes to improving air quality, climate mitigation, carbon sequestration, soil improvement etc.

In addition to economic and climate change mitigation benefits, forestry also provides a valuable source of renewable energy and other public goods and services, such as biodiversity, and recreation.

➤ **Forestry should be integrated into agriculture and included in the Department's title:**

Action 3 of GOAL 4 (MISSION 1) (p 62) advocates to '*Place farmers at the centre of a new and improved afforestation scheme*', this cannot be done in isolation, but requires integration of forestry in the agricultural sector. Action 3 also states '*A revised afforestation scheme could include: farmers undertaking the strategic planting of trees to create filtration buffers for example which can reduce sedimentation of adjacent water courses and intercept nutrient runoff from dairy and cattle farms to protect water quality; new native woodlands can provide habitat corridors for wildlife while at the same time providing a source of domestic fuel wood; small forest areas, shelterbelts, riparian planting and continuous cover forestry.*' ITGA welcomes this wording and has advocated this inclusion and integration of forestry in the farm enterprise for many years. However, by adding forestry as a separate GOAL, rather than integrating this into GOALS 1-3 of MISSION 1, the Agri-Food Strategy is failing to take the opportunity to better integrate forestry into farming.

It is important that forestry is properly integrated into farming and that the forestry sector is recognised in the Department's title and in the titles of its framework documents. The title of the agricultural sector's strategic plan Agri-Food Strategy to 2030 does not reflect the importance of the forestry sector within the Department or its potential contribution to the rural economy, sustainable agriculture or its central role in Ireland's Climate Action Plan and Biodiversity Action Plan. The forestry sector affects considerably more livelihoods than the equally important Marine sector, with the forestry sector consisting of 23,000 forest owners and employing another 12,000 people<sup>1</sup>. Aside from its substantial contribution to climate change, renewable energy, recreation and biodiversity, the forest industry, comprising growing, harvesting and processing of forest products, makes a significant and growing contribution to the Irish economy and the output is valued at €2.3 bn per annum. If the Department intend the farming community to positively consider forestry as a significant land use option, forestry should be included in the Departments title. It should also be reflected in the title of this Agri-Food Strategy to 2030, possibly with the amended title, 'Agri-Food & Forestry Strategy to 2030'.

The Agri-Food Strategy to 2030 touches on the pressures on agriculture from the wide range of increasing societal demands. Integration of all sectors under the DAFM umbrella and working together towards a common goal is key to ensuring these demands for quality sustainably produced food and timber, biodiversity, carbon sequestration, air and water quality, nature conservation, health & wellbeing and recreation are met and secured for future generations to come.

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<sup>1</sup> DAFM Forest Statistics – Ireland 2020

➤ **Need for Policy Coherence should include integration with Forest Policy.**

The Agri-Food Strategy to 2030 highlights the need for Policy Coherence ‘*There is a need for policy coherence between food, climate and environment*’ (p14), yet there is no evidence of such coherence when it comes to forest policy, which is only mentioned in the context of ‘GOAL 4: Develop Diverse, Multi-functional Forests’, aims to ‘*place farmers at the centre of a new and improved afforestation scheme*’. This can only be achieved through Policy Coherence. Forest policy consists of more than just afforestation and requires a vision beyond the planting stage.

The Agri-Food Strategy recognises ‘*The interconnectedness of policies for food, health, climate and the environment*’ (p14). A new Forestry Strategy for Ireland is currently being developed as part of Project Woodland and this Forestry Strategy should form an integral and central part of the Agri-Food Strategy to 2030. This new Forestry Strategy currently being drafted should be referenced in the Agri-Food Strategy 2030 as the recognised and adopted Strategy for the forestry sector.

The Agri-Food Strategy contains several references to the Nation’s health in the context of Covid-19. The positive role of woodlands in relation to human health and mental wellbeing is widely accepted in many cultures and has never been more important than during the Covid-19 pandemic. Also, the importance and benefits of trees for animal welfare for shelter and shade is widely acknowledged in many countries and could be encouraged in line with the ‘One Health One Welfare’, approach, endorsed by the Strategy.

➤ **The potential for forestry as an additional income stream for farmers should be emphasised**

GOAL 3 MISSION 2: Increase Primary Producer Diversification & Resilience (p93), acknowledges that ‘*The significant supports available to support afforestation can provide sustainable income streams*’ in a single paragraph with a referral to the Actions in GOAL 4 (MISSION 1).

Ireland currently has one of the widest differentials in the EU between farmers’ incomes and gross wages/salaries in the wider economy (as highlighted in the “Challenges and Objectives of the CAP-post 2020” presentation made by the EU Commission on the future of CAP at the CAP Consultative Conference dated 4<sup>th</sup> July 2018). Forestry income will be critical in bridging the gap between Irish farmers’ incomes and incomes in the wider economy. Forestry income is direct market income and is a source of long-term sustainable revenue for farmers and landowners. Such direct market income from forestry will also ensure a better balance between the operating subsidies and market income per farm and will help ensure the longer-term economic sustainability of the wider agriculture sector through reduced reliance on subsidies and through the generation of a more diverse income source.

The Irish Timber Growers Association (ITGA) through its work and various information and representation initiatives is committed to supporting the sector and its critical role in the sustainable economic, environmental and social development of rural Ireland. ITGA is actively supporting and promoting forestry's contribution to the State and recognises the significant importance of developing and implementing a comprehensive and robust National Forestry Strategy that underpins our national Climate Change and Biodiversity aims.