



IRISH TIMBER GROWERS ASSOCIATION

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Irish Timber Growers Association submission to the Department of Agriculture, Food and the Marine on the Interim Standards for Felling and Reforestation (October 2019)

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 (DAFM) on the Interim Standards for Felling and Reforestation (October 2019).

A critical point to be made in this submission is that ‘*universal standards*’ as outlined in the first sentence of the introduction to the Interim Standards for ‘*all felling (thinning and clearfelling) and reforestation projects on all sites throughout Ireland...*’ would not serve the best interests of DAFM in achieving forest policy aims or the forestry sector. By definition, a ‘*universal standard*’ would be required to accommodate and address standards for sensitive sites which then results in the need to incorporate potentially inordinate constraints and controls in such a Standard.

In this regard, it should be noted that sites differ with regards to size, location, environmental sensitivity and designation, elevation, soil type, topography and many other factors and consequently require different approaches to thinning, felling and reforestation in terms of timing, harvesting methods, equipment and work systems employed. A *universal standard* as proposed would not be appropriate to all sites, as by its definition it would have to cater for more environmentally sensitive areas, and for many sites the measures propose inordinate constraints and over prescription with consequent excessive cost and resource requirements.

The original Forest Harvesting and the Environment Guidelines acknowledged this, and the wording was more appropriate in this regard:

The guidelines describe a range of measures intended to cover all situations relating to forest harvesting and the environment. **Not all of the measures outlined will be applicable to every site.** However, it is the responsibility of forest owners to identify and apply those measures which are appropriate to their particular forest.

An overriding concern of the Irish Timber Growers Association is that a number of these requirements may simply not be feasible on some sites. Where unrealistic requirements are incorporated into this document it effectively means that the forester involved and potentially the forest owner will be in breach of the Felling Licence, therefore in breach of the Forestry Act 2014 with consequently legal repercussions for all parties involved. Also, as these Standards must be adhered to ‘*on all sites throughout Ireland..*’, in order for forest owners and forest managers to comply with Forest Certification requirements, where such standards are not achievable in practice it will have significant repercussions for our forest estate achieving Certification to either the FSC or PEFC Schemes. A particular concern in this regard is Section 11; Timing of Operations, where it states;

“Cease all felling and extraction and other machine operations onsite (or redirect to more stable areas of the site) during and after periods of rainfall which result in the possibility of the surface mobilisation of silt.”

‘*...the possibility of the surface mobilisation of silt,*’ can occur on a forest site during normal and typical harvesting conditions without recent heavy rainfall. This requirement to, ‘*Cease all felling and extraction and other machine operations onsite...*’ is not workable in reality and should only be a requirement where there is a real risk that silt will end up in a watercourse.

With regards to Reforestation, on reviewing these guidelines they appear to be the same as the [Environmental Requirements for Afforestation December 2016](#) in which case consideration might be given to stating that the [Environmental Requirements for Afforestation December 2016](#) also apply to Reforestation. Where and if there are differences under relevant headings these might then be highlighted.

Re: 2. Harvest Plan

It is recommended that this requirement should be made appropriate to scale. For the average small woodland holding this requirement is too onerous for all thinning and felling operations.

The following statement requires further consideration before finalisation of the standard: ‘*Depending on nature and scale of the operations, it may be advisable to liaise with various statutory bodies... Key bodies include Inland Fisheries Ireland, the County Council and the National Parks & Wildlife Service.*’

Careful consideration should be given as to whether various bodies have the resources to liaise with forest managers in this regard given the significant increase in harvesting forecast in the coming years. It would be counterproductive to include this requirement where such bodies are not in a position or properly resourced to address such requirements.

From professional experience with similar requirements in relation to forest certification, some statutory bodies appear not to be equipped and resourced to deal with such ongoing requests from forest managers regarding liaising on Forest Management Plans and resulting in inordinate delays in finalising Plans.

Statutory bodies should commit to any such role with strict implementation timelines to ensure that requests from forest managers when attempting to liaise with statutory bodies, whether these are mandatory or *'advisable'*, are met with a timely response. Timelines for responses must be built into these Standards.

Re: 3.2 Clearfell coupe size and greening-up requirement

'The maximum allowable size for any single clearfell coupe is 25 ha.'

This is a departure from previous guidelines as outlined in *Felling and Reforestation Policy (May 2017)* which outlines a more nuanced approach to Felling coupe sizes:

2.6 Felling coupe size

The Code of Best Forest Practice - Ireland outlines current forest policy in relation to felling coupe size. In Ireland, a general distinction is made between coupes under 25 ha and coupes over 25 ha. When felling coupes are extended, consideration should be given to scheduling clearfells so that adjoining reforestation areas are well-established. Other issues to be considered are wind risk on adjoining stands and potential edge effects, particularly with Norway spruce. **Large felling coupes over 25 ha may be acceptable on flat terrain or valley bottoms where visual impact is minimised.** Felling in very sensitive landscape areas should be limited to 5-15 ha. While broad guidelines on coupe size are to be considered, size limits should not be absolute but relate to the size of the forest or water catchment unit. In the latter case, the coupe size will influence the likelihood of nutrient pollution. This would be an important issue if a catchment contributes to a drinking water supply.

To define a maximum allowable felling coupe size of 25 ha in the new standard for all sites is restrictive and in very large woodland areas may not be appropriate. Also, the requirement that, *'No other coupe within 120 m can be clearfelled until the original coupe has greened up'* is a significant distance between coupes in smaller forests, particularly where initial felling coupe size is small. There must also be a clear definition made as to what is the minimum size that constitutes a *'clearfell coupe'*. If this is not defined any small coupe felled would be subject to this 120 m radius. For example, within a woodland improvement scheme or potentially in Continuous Cover Forestry (CCF) where small coupes are felled to encourage natural regeneration or for enrichment planting, these would require to be 120 metres apart. This requirement must be revised, as to have 120 metre distance between such small coupes in a woodland improvement or CCF scheme or within a small forest would not be in keeping with the aims of these management regimes.

Re: 5. Contingency Plan

The Contingency Plan in Appendix C may have omitted important contact details as there are no contact details suggested for local hospitals or emergency services, nor are there details prompted for the property co-ordinates, entrance points, etc.

The description of potential emergency scenarios and what to do is very onerous to be included in a contingency plan and would have the potential to be very large in order to be exhaustive. Again, in making this a requirement it should also be considered that in order for forest owners and forest managers to comply with Forest Certification requirements this will then become a requirement that could be interpreted by auditors to require an exhaustive list. This type of information should be provided in appropriate training courses for forestry workers and operators.

A 'Template Emergency and Contingency Plan' was developed as part of the recent Group Certification Project funded by DAFM, which provides details for use in case of an emergency. See <http://www.groupcertification.ie/images/docs/FMM/Tem.4.2b%20V1-0%20Emergency%20and%20Contingency%20Planning.pdf>

Re: 6 Exclusion Zones

If there is a requirement for a Harvest Plan with associated maps, as stated in Section 2, it would follow that Exclusion zones are marked on these associated maps, so that no additional site map would be required.

Re: 8 Temporary water crossings

The reference '*Permanent water crossings are dealt with COFORD Forest Road Manual and roading sections of the Forest Harvesting & the Environmental Guidelines (2000)*' may be misleading if it is intended that this Standard is to replace these previous Forest Harvesting & the Environmental Guidelines (2000).

Re: 9 Managing Extraction

A requirement in this section, as below, is overly restrictive and not necessarily required in many suitable dry sites particularly during summer harvesting

- Harvesting and extraction machinery must not operate on unprotected or unbrushed routes, regardless of weather conditions.

In dry conditions many drier sites would not necessarily require this protection or brush paths during thinning/felling operations in the summer months. This requirement would be impractical on many appropriately dry sites where brush, lop and top and residue harvesting is planned as part of the harvesting operations to provide biomass for renewable energy markets.

The requirements “*Locate timber landing bays at least 50 m from the nearest aquatic zone*”, will not always be feasible, particularly in narrow forest properties or due to difficult terrain and other issues, and where included in this Standard are likely to make thinning and potentially felling unviable on some sites due to site dimensions, access, terrain and harvesting constraints and ground conditions. The minimum plantation width in past DAFM afforestation grant schemes was less than 50 metres thereby making the thinning/felling of such grant aided properties impossible where access is not available to adjoining lands to locate such timber landing bays.

It should also be noted that the requirements that, “*No forwarding or ground haulage operations are to take place on either forest or public road surfaces... Keep roadside drains and culverts free of logs, debris and obstructions*” will not always be feasible, particularly in narrow forest properties or due to steep terrain. It will, at times, be necessary for machinery operators to forward or undertake ground haulage along a forest road to ensure roundwood stack heights are safe and where steep terrain or ground conditions necessitate and when harvesting employing skyline or high lead systems. Also, roadside drains sometimes have to be employed for safe stacking where there is limited space on site. Temporary filling of dry roadside drains with logs may be required at times where there is a such limited stacking space and should not be removed as an option.

Re:10 Other measures

With regards to these measures, Health and Safety should be of foremost importance. Health and Safety should be outlined during works pre-commencement meetings. In this regard, a pre-commencement checklist would be useful, such as the Work Planning Checklist developed for the DAFM funded Group Certification scheme
http://www.groupcertification.ie/images/docs/FMM/Tem.7.3_V1-2_Work_Planning_Checklist.pdf

It is important to note that Pollarding should only be undertaken where this is safe to do so and where the operator is specifically trained in the proper procedure and has machinery and safety equipment capable of undertaking such operations employing best practice. Only specialised machinery is suitable to undertake such pollarding on forestry sites and the Standards should recognise this in the text.

Re: 11 Timing Operations

As previously mentioned, in relation to the requirement, “*Cease all felling and extraction and other machine operations onsite (or redirect to more stable areas of the site) during and after periods of rainfall which result in the possibility of the surface mobilisation of silt.*”

‘...the possibility of the surface mobilisation of silt,’ can occur on a forest site during normal and typical harvesting conditions. This requirement to, ‘*Cease all felling and extraction and other machine operations onsite...*’ is not workable in reality and should only be a requirement where there is a real risk that silt will end up in a watercourse.

Given the requirements to be met in these Standards, particularly in Managing Extraction and Timing of Operations sections, many forest owners and their managers will be reluctant to undertaking thinning in their woodlands due to the significant difficulty in meeting these

requirements and the consequent risk they will run in contravening Felling Licence conditions. In addition, many timber growers are likely to decide on summer felling to minimising these risks which will then result in the timber industry experiencing mobilization issues and supply difficulties during the winter/spring months.

Re: 13. Reforestation

Reforestation map should be appropriate to scale as this will be particularly onerous for small plantations.

In many instances parallel windrowing will be necessary on reforestation sites and it should be noted that windrows will only be visible for a number of years after planting before thicket stage.

In relation to fertiliser application and soil analysis, for many nutrients soil analysis is very limited in its ability to determine and measure nutrients levels required for tree/forest growth. A prescription by a professional forester based on the health of the previous crop should be acceptable in determining if fertiliser is required and an appropriate application rate.

Re: 15 Preparation, storage and use of potentially hazardous material

It would be good practice that forest operators carry a pollution control spill kit in their machine in case of accidental spillage of chemicals or oils.

In the paper entitled, '*Water, Forests, People: The Swedish Experience in Building Resilient Landscapes*', Eriksson, M., Samuelson, L., Jägerud, L. et al. Environmental Management (2018) 62: 45. outline the major changes in practices that transformed Swedish forestry. The following is an extract from the paper;

*'In 1993, a major revision of the Swedish Forestry Act (SFA) was undertaken leading to two major changes (Swedish Forestry Act 1993). First, an ambitious environmental goal was included in the SFA that led to environmental concerns being given equal value to the previous production goal. **Secondly, the forest governance system was softened, replacing detailed regulation, command and control, monitoring and enforcement with information sharing and education and advisory services (Appelstrand 2012; Beland Lindahl et al. 2017). Forest owners were thereby given greater autonomy but were still required to take special measures to protect valuable biotopes, aquatic systems and cultural heritage. The expression "freedom under responsibility" became a signature of this change in governance system and characterizes "the Swedish Forestry Model" (KSLA 2009).***

In the context of the success of the Swedish approach highlighted in the above study, the general forest governance system employed might be examined in the context of these Standards and the level of detailed regulation, command and control proposed in the document might be softened allowing more autonomy for forest owners and professional forest managers to achieve the aims of the Forestry Act 2014 on a site by site basis.