

## **Working Towards Ireland's Shared Vision for Forestry and a New Forest Strategy.**

### **Consultation response from SWAN, 270422**

#### **A. COPY OF RESPONSES TO ONLINE SURVEY**

*[Note this records only the written text, not the responses to the multiple choice questions. Unfortunately there was no facility to save your full survey response.]*

#### **Forest in Ireland**

##### **'Ireland needs more forests'**

This question does not provide the information needed for an informed response. In relation to water quality /status, the type, location and management of forestry is critical and while these matters are dealt with later in the consultation, this question cannot be meaningfully answered in isolation from them. Generally, more native broadleaves, are to be welcomed, once in the right location.

##### **'The right reasons'**

This question is too simplistic. While of course SWAN recognises the vital importance of appropriately site forestry for carbon sequestration and catchment-based flood management it can also be a net emitter of Carbon if planted on peat soils as, evidence show it currently is. To date, the majority of state afforestation has taken place on unsuitable peat soil, leading to soil drainage and carbon loss. Similarly, in relation to freshwater biodiversity, poorly sited forestry can have a significant negative impact, in particular the critically endangered Freshwater Pearl Mussel.

#### **Forests for tackling Climate Change and enhancing Biodiversity**

It is regrettable that water quality does not receive the necessary attention in this question and wider consultation, along with climate and biodiversity.

The framing of this question is also too simplistic. While SWAN believes that appropriately sited and managed forestry has the potential to protect and improve biodiversity, what is far more pertinent is the negative impact that forestry has on biodiversity and water quality. It is vital to recognise that forestry is one of the most significant pressures on the water environment, in particular high status sites and in that context we strongly disagree with a blanket statement that "*Ireland needs to create more forest to protect and improve biodiversity*" because in fact forest is linked by the evidence to the opposite i.e. declines in the ecological status of waterbodies and more forestry could in fact exacerbate the problem.

## FORESTS FOR PEOPLE

While SWAN focuses primarily on water and catchment management, we also have a strong position on the need for public engagement in water protection and catchment management. Access to a healthy landscape and catchment is important in order that people feel a connection with their local woodlands and the rivers in whose catchment they are found, so that they are motivated to become actively involved in their protection.

## THE RIGHT TREES

It is important to distinguish between 'native' trees and 'broadleaf' trees since broadleaves may be non-native and have the potential to be invasive and cause a negative impact on waterways, through, for example, excessive shading along river banks.

As a general principle SWAN is in favour of maximising the area of naturally regenerating native woodland in particular as part of river restoration and catchment-scale sustainable water management.

## THE RIGHT PLACE

The location of forestry must be decided based on a comprehensive, strategic spatial plan which carefully maps and accounts for ecological sensitivities and which clearly zones certain catchments illegible for planting, where ecological vulnerabilities make it unsuitable. e.g. catchments of freshwater pearl mussel rivers. SWAN only supports woodland of the right species in the right place with the right management.

## THE RIGHT MANAGEMENT

*[This had to be added to a supplemental document as there was no space provided for additional comment in this section]*

The first question is the section above is misleading: "*Forests in environmentally sensitive areas such as peatlands should be managed and maintained in a way that they can have a net benefit to the environment and climate change.*" There is an inbuilt assumption that forests on these sites can be managed in a way that will mean they have a 'benefit' to the environment. This is not the case, in particular for peatland sites, both from a water quality and climate point of view. Planting of trees can impact water levels and thus the hydrology of the site. In addition, drainage can also give rise to the release of silt into waterways and this is an important transport mechanism for nutrients bound to soil particles leading to increased risk of nutrient enrichment and associated oxygen fluctuation.

## LESS FAVOURABLE LIGHT

None of the above. See earlier response regarding the need for spatial planning so that trees are only planted in areas zoned not ecologically sensitive. If this strategic plan was firmly based in the science, adhered to and well communicated this would alleviate well founded public concerns about conifer planting.

## QUESTION ON VISION STATEMENT

This should include a reference to protection of the water environment and the need for sensitivity mapping to ensure that no afforestation happens in ecologically unsuitable sites / catchments.

### B. Supplemental Recommendations and rationale

Forestry has been identified as is causing a significant water quality/status impact in 233 waterbodies nationally and is the second most significant pressure in our most valuable high status waters. This demonstrates that current management is not working to protect water from forestry. EPA catchment characterisation that found that the number of waters impacted by forestry declined by only 2% (5) since the previous river basin management planning (RBMP) cycle.

There must be a requirement that all planting and felling is assessed specifically against WFD objectives, and that permits are only granted if it can be demonstrated that WFD objectives will not be compromised, taking into account cumulative impacts at a catchment scale.

SWAN notes the additional risk that is, and will increasingly be, posed by forestry in line with the national Land Use and Land Use Change (LULUCF) targets to mitigate against climate change. For example, the target of 8,000 hectares per annum set in the 2019 Climate Action Plan<sup>1</sup> and annual afforestation rate increases “consistent with realising [the] ambition” to “reduce Ireland’s net LULUCF emissions by 4.6 MtCO<sub>2</sub>eq. in 2030 against current projected emissions” in the current Climate Action Plan.<sup>2</sup> However, this risk is not identified in the draft plan: it doesn’t propose any additional measures to mitigate this very significant land use risk. In this context, it is particularly important for carbon emissions as well as for water protection, that the Hydrofor recommendation to halt afforestation on peat soils in acid sensitive headwater catchments is implemented.<sup>3</sup>

In order to inform the national planning context for crucial catchment-specific WFD-specific assessments, and to ensure “the right tree in the right place”, it is important that a programme of catchment sensitivity mapping is initiated in order to identify the extent and location of suitable soil and other catchment conditions for various forms of afforestation and to ensure afforestation of appropriate species takes place only in suitable catchment locations. This should take place as part of a comprehensive spatial mapping exercise that identifies sensitive areas and zones them unsuitable, where necessary for forestry.

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<sup>1</sup> Government of Ireland (2019) CLIMATE ACTION PLAN 2019 - To Tackle Climate Breakdown. Download [here](#)

<sup>2</sup> Government of Ireland (2021) CLIMATE ACTION PLAN 2021 - Securing Our Future. Download [here](#)

<sup>3</sup> Kelly-Quinn, M., Bruen, M., Harrison, S., Healy, M., Clarke, J., Drinan, T., Feeley, H, Finnegan, J., Graham, C., Regan, J., Blacklocke, S. (2016) Research 169: HYDROFOR: Assessment of the Impacts of Forest Operations on the Ecological Quality of Water, (HYDROFOR), (2007-WQ-CD-2-S1), Environmental Protection Agency, Wexford

[HYDROFOR is an EPA and DAFM-supported multi-institution co-operative academic project to investigate the impacts of forestry operations on Ireland’s aquatic ecology. <https://www.epa.ie/publications/research/water/EPA-RR-169-Essentra-final-web.pdf>

SWAN recommends the following:

- All forestry planting and felling licences must include a WFD-specific assessment, and contain site-specific stipulations for water protection, taking account of catchment-scale cumulative impacts.
- As a minimum, introduce a prohibition on afforestation on peat soils in acid sensitive headwater catchments, as recommended by the Hydrofor research project.
- A programme of sensitivity mapping should be initiated as a priority in order to effectively manage the impacts of the projected increased afforestation in coming decades.