



Submission to the draft Implementation Plan on Review of the Afforestation Application Process

Introduction

The future of the afforestation programme is dependent on the successful implementation of the recommendations of the Review of Approval Processes for Afforestation in Ireland. The actions set out in the draft implementation plan are very vague and greater clarity is needed, as well as assigning responsibility to designated personnel for the delivery of all actions. The importance of this plan should not be underestimated as its success is key to restoring confidence in the afforestation programme and ensuring that afforestation targets are achieved into the future.

To ensure the successful implementation of the review, IFA is proposing the following:

1. An external Project Manager is appointed to oversee the delivery of the actions, as well as to provide more detailed plans under each action section to deliver on the recommendations. It is IFA's preference that Mr. Mackinnon is retained in this role as he is familiar with the actions required and has expertise in delivering a revitalised afforestation programme.
2. The Working Group to oversee the implementation plan must be compromised on a permanent basis of relevant agencies and stakeholders selected from the Forestry Implementation Group.

IFA Response to Actions

No.	Ways Forward	Lead Ownership	Others	Actions	Deadline
1	Raise the political profile and commitment to woodland creation.	DAFM		<p>The Minister of State, along with the Minister for Agriculture, Food and the Marine, will continue to seek support for woodland creation from government colleagues, particularly in the context of achieving targets within the Climate Action Plan 2019 and contributing to the National Biodiversity Plan.</p> <ul style="list-style-type: none"> • The actions stated here are already taking place, the recommendation is to raise the profile and commitment to woodland creation. Please can you outline the Departments plan to raise the profile? 	On-going

				<ul style="list-style-type: none"> • As per IFA's General Election submission, IFA is seeking that forestry be the responsibility of the Senior Minister in the Department of Agriculture, Food and Marine. • Including Forestry in the title of the Department should be considered. 	
2	Focus action on reducing current backlog of applications.	DAFM		<p>Applications are being categorised to ensure that the most appropriate process is applied towards timely approval.</p> <p>Resource issues with new Appropriate Assessment procedure are dealt with under Action 9.</p> <ul style="list-style-type: none"> • Resolving the current backlog in the licence application is paramount and must be the top priority for the Department. • A clear and targeted plan is needed to address the backlog. • Farmers need confidence that licences will issue in a timely fashion, as per the timeline in the Farmers Charter. 	Q1 2020
3	Introduce Pre-Application discussions with Issues/Action Log.	DAFM	Teagasc	<p>The Department to consider the introduction of a pre-application 'face to face' discussion process (with an inspector not involved in approval of the application), and limited to advice of a scoping nature, and to examine the potential for Teagasc involvement.</p> <ul style="list-style-type: none"> • The pre-application discussion meeting <u>must be</u> introduced as a matter of urgency. • This will improve the quality of applications and ensure that farmers are aware of the potential issues on site and additional costs associated with licence applications. • It may also reduce the number of applications being appealed. 	Q2 2020
4	New Requirement for Environment Report supported by Planning Grant.	DAFM	Industry	<p>The Department to require that Individual licence applications be accompanied by more detailed baseline environmental information. Other environmental/ecological information to be sought as needed, including walkover habitat surveys, pre-screening AA report, Natura Impact Statements (NIS) or other environmental report.</p> <p>The Department to examine the possibility of covering any additional costs that may be incurred.</p>	Q2 2020

				<ul style="list-style-type: none"> • The introduction of a Planning Grant <u>must</u> be introduced in tandem with the any new requirement for an Environment report. • Farmers will not plant if they have to incur this additional cost. THERE CAN BE NO MORE ADDITIONAL COSTS FOR FARMERS UNDER THE AFFORESTATION PROGRAMME. 	
5	Address problems with poor quality applications.	DAFM	Industry	<p>The Department to provide better guidance (via training and written) on the minimum requirements for mapping and supporting environmental information to accompany forestry licence applications.</p> <p>The Department to introduce improved quality control, which may lead to the rejection of poor-quality applications.</p> <ul style="list-style-type: none"> • The communication between local Inspectors and registered foresters needs to improve. There should be regular meetings between both parties at a local level to improve relationship and facilitate improved communication. • Poor quality applications are directly related to the poor communication from the Department. 	Q2 2020
6	Develop guidance on the Habitats Directive as it affects licensing applications.	DAFM		<p>The promotion of a greater awareness and understanding of the requirements of the Habitats and Birds Directives permeate Department actions under Actions 3, 4 and 5 above (e.g. will be reflected in any related training or circulars).</p>	Q2 2020
7	Discuss with the European Commission the impact of the Directive and woodland creation to support the Climate Action Plan.	DAFM	EU Commission COFORD PAW*	<p>The Department to begin regular dialogue with European Commission desk officers in relation to transitional arrangements for the current forestry programme (as new State Aid regulations delayed) and the development of the next forestry programme. This dialogue to cover, among other things, compliance with environmental legislation and alignment with Europe-wide priorities, e.g. Habitats Directive, Water Framework Directive, EU Climate Action strategies and targets. Such interaction will explore the Commission's expectations regarding the practical implementation of these directives in terms of new or amended forestry measures.</p>	Q2 2020 Ongoing

				<p>It may be appropriate for other stakeholders to meet the Commission to help increase their understanding of this issues facing Irish forestry (the PAW advisory is considering such an approach).</p> <ul style="list-style-type: none"> • Side by side with increased communication with the European Commission, there needs to be improved communication with other Government Forestry Departments within the EU to get better insight into how other countries comply with environmental legislation. • From IFA's discussions with other member states Ireland seems to have a more onerous licencing system, that lacks any flexibility. 	
8	Revise Memorandums of Understanding (MOU) with National Parks and Wildlife Service (NPWS) and National Monuments Service (NMS).	DAFM	NPWS NMS	<p>To review the MOU between the Department and the NPWS and the NMS, who as prescribed bodies are consulted on forestry licence applications in sensitive areas. Any revisions to be based on needs of the parties involved, with a view to a timely and value-added referral process.</p> <ul style="list-style-type: none"> • Please can there be a presentation on the current MOU at the next Forestry Implementation Group meeting and a discussion to understand the changes that the Department is seeking. 	Q3 2020
9	Recruit additional inspectors and environmental specialists.	DAFM		<ol style="list-style-type: none"> 1. The Department to appoint two additional ecologists in Quarter 1, 2020. 2. A specialist environmental consultancy is in place and will continue to assist with Appropriate Assessment screening of applications for the foreseeable future. 3. A multi-annual tender for ecology services will be published in Quarter 1, 2020. 4. The recruitment of additional forestry inspectors and ecologists is under consideration. 	<ol style="list-style-type: none"> 1. Q1 2020 2. On-going 3. Q1 2020 4. On-going
10	Introduce genuine Key Performance Indicators (KPIs).	DAFM	Industry	The Department to review current statistical information on forestry licence approvals in order to develop quantifiable indicators of performance to evaluate the Department's success in meeting	Q2 2020

				<p>targets. Preparation of these indicators will be in consultation with the relevant stakeholders.</p> <ul style="list-style-type: none"> • There is a significant need for greater transparency in the information provided by the Department to stakeholders. • The KPIs should include information on the number of applications being screened in, screened out, requiring NIS, requests for additional information, information at county level, turnaround times with Statutory consultees, additional information being requests from Statutory consultees, observations, appeals etc. • The expansion of the KPIs and the information should be viewed as an opportunity to identify and resolve blockages in the system. 	
11	Develop a Customer Service Charter.	DAFM	COFORD PAW Industry	<p>Review the Farmers' Charter of Rights 2015-2020 and the Customer Charter and Customer Action Plan 2015-2020 with a view to incorporating them into a broader Forestry Customer Service Charter.</p> <ul style="list-style-type: none"> • There must be meaningful engagement with industry in the development of this Customer Service Charter. • The level of customer service being provided to new and existing customers needs to be significantly improved. 	Q2 2020
12	Prepare a Forestry Strategy for Ireland.	DAFM	COFORD Working Group on Forestry Policy COFORD PAW	<p>Develop a Forest Strategy for Ireland as part of the new Forestry Programme. The COFORD Working Group on Forestry Policy (or sub-group) will provide guidance for the development of this strategy. The Group will collaborate with COFORD PAW and other entities in this process.</p> <ul style="list-style-type: none"> • IFA is supportive of the development of a new Forest Strategy for Ireland that puts farmers and rural communities back at the centre of the forestry programme. 	Q4 2020
13	Ensure all State Bodies play their part in implementing the Strategy.	1. DAFM 2. Coillte	1. Public bodies 2. Bord na Móna	<p>1. The Department to provide funding to public bodies to establish native woodlands on suitable public land under a new Woodland Creation on Public Lands scheme.</p> <p>2. Coillte to re-enter afforestation, which includes the planting of native woodlands under the Coillte Nature Initiative.</p>	1. Q1 2020 2. On-going

14	Establish an Irish Forestry Standard.	DAFM	Industry NMS, NPWS, Environmental eNGOs [Others to be advised]	<p>The Department to consolidate the existing suite of environmental and silvicultural guidance into a new Irish Forestry Standard (or Good Forest Practice - Ireland), in consultation with stakeholders.</p> <ul style="list-style-type: none"> A new standard must be practical, flexible and recognise the size of the forests in Ireland. There will be increased forest abandonment if management costs continue to rise. 	Q4 2020
15	Raise the status and profile of the Inspectorate.	DAFM		<p>The continued evolution of forestry in Ireland and the Department's role in promoting and developing a sustainable forestry sector will be kept under review. Organisational responses, including the need for structural change, role revision or title change, will be assessed on an on-going basis.</p> <ul style="list-style-type: none"> The proper function of the Department is central to resolving the issues in the afforestation application process. There is not sufficient information on the actions that are to be taken by the Department to address industry's concerns. A more detailed plan is required on this issue with input from relevant stakeholders. There needs to be better use of existing resources, with training provided to local Inspectors to improve communication skills and a greater willingness by all in the Department to positively engage with potential customers. There needs to be improved internal communication to rebuild trust, as well as monitor and track progress of licences. 	On-going
16	Need for greater commitment by all to partnership working.	DAFM	Environmental eNGOs, COFORD Taoiseach DCCAE, DCHG [Other Depts. /Agencies]	<ol style="list-style-type: none"> The Department will seek to intensify engagement with the environmental pillar and other relevant Departments/agencies through the FPIG, COFORD working groups and other fora. Consideration to be given to expanding Forestry Programme Group membership to include the Department of Taoiseach and the Department of Climate Action, Communication and Environment. <ul style="list-style-type: none"> For a partnership approach to be successful, there must be a shared vision for the sector based on mutual respect of all parties. 	<ol style="list-style-type: none"> On-going Q1 2020

				<ul style="list-style-type: none"> • Local forest owners must be empowered within this system if afforestation targets are to be achieved. • The development of the new Irish Forest Strategy will be very important to securing greater commitment for all parties. 	
17	Raise awareness of value of woodland creation and a vibrant forest industry.	DAFM COFORD	COFORD PAW Forestry Promotion Group [All relevant stakeholders]	<p>The Department to develop a Communication Strategy to underpin a promotion action plan that will involve all stakeholders across the industry. This work will be conducted in conjunction with the COFORD PAW and will report the Forestry Promotion Group, chaired by the Minister of State.</p> <p>A stakeholder mapping exercise is underway (the ForOwn project) and could be further developed.</p> <ul style="list-style-type: none"> • IFA looks forward to inputting into the development of a Communication Strategy for the sector. 	Q3 2020
18	Take stock of the multiplicity of campaigns and initiatives to promote woodland creation.	COFORD PAW	DAFM Teagasc	COFORD PAW (in conjunction with the Department) will organise a workshop that brings together Department-supported promotional projects with a view to identifying synergies and better overall co-ordination. Lessons learnt will inform the next Departmental “Call for Proposals for Promotion” project. There may be capacity for Teagasc to advise on how the Department might evaluate the success of promotional initiatives.	Q3 2020
19	Review education and training of forestry professionals.	COFORD PAW	Industry SIF, AIFC, ACA, ITGA, Teagasc, UCD, WIT, HSA [Others]	<p>A training needs analysis will be completed for the forestry sector, including foresters and other relevant groups. This analysis will also explore training needs in relation to environmental legislation, health and safety, silvicultural best practice and the promotion of forestry as a career.</p> <ul style="list-style-type: none"> • It would be beneficial if the review also considered the training needs of forest owners and included training days hosted by the Department for forest owners. 	Q4 2020
20	Introduce fees for submitting applications, making submissions and lodging appeals.	DAFM Agriculture Appeals Office		1. Introduce a Statutory Instrument (Forestry Act, 2014) to make provision for fees for applications and submissions on forestry licence applications.	1. Q1 2020

				<p>2. Amend Agriculture Appeals Act, 2001 to make provision for the introduction of fees for appeals to the Forestry Appeals Committee and to require a submission in the first instance.</p> <p>3. Liaise with AAO/Forestry Appeals Committee to progress introduction of fees for appeals on foot of amendment to the Agriculture Appeals Act.</p>	<p>2. Q2 2020</p> <p>3. Q2 2020</p>
21	Conduct pilot studies on land availability, including the potential for woodland creation on areas of unenclosed land.	DAFM		<p>The Department will seek to create new or enhanced opportunities for forest creation on all farm holdings, which will include a scoping exercise to examine the possibility of new forestry models on less favourable land.</p> <ul style="list-style-type: none"> • Land availability is the biggest barrier to achieving the afforestation programme targets. As long as the Department continues to resist addressing this issue, afforestation targets will remain unattainable. • IFA in partnership with other stakeholder spent nearly four years developing the Lands Type for Afforestation document, which was developed to replace the 20% rule. This report, which was published nearly 4 years ago, developed a site classification system to assess suitability of land. Yet the 20% rule still remains in place. • It is disingenuous of the Department to discuss a scoping exercise to look at new forestry model, when Lands Type for Afforestation document is published. The sector needs real action on unenclosed land and the removal of the 20% rule. 	<p>Q4 2020</p> <p>Q2 2020</p>