



**Stakeholder Consultation Coillte Teoranta – The Irish Forestry Board -
Forest Stewardship Council (FSC) Certification**

Response to Stakeholder Consultation from Mountaineering Ireland

April 2018

Introduction

As the representative body for hillwalkers and climbers on the island of Ireland, Mountaineering Ireland gains benefit from and has an interest in the management of Coillte's forests.

Mountaineering Ireland is recognised as the National Governing Body for the sport of mountaineering by both Sport Ireland and Sport Northern Ireland. The term mountaineering refers to a wide spectrum of activities that includes rambling, hillwalking, rock and ice-climbing, bouldering and alpinism. Mountaineering Ireland has over 12,500 members, comprising 184 clubs and approximately 1570 individual members (December 2017).

This submission sets out a number of key points in relation to the management of Coillte's estate, we hope that this is helpful to the current stakeholder consultation and the forthcoming audit.

1. Social & Environmental Panel: public participation

In recent years Mountaineering Ireland has had representatives on six of Coillte's eight Social & Environmental Panels. Mountaineering Ireland has asked a number of times what is happening to the Social & Environmental Panels following Coillte's internal restructuring process in 2017, while there has been recent verbal feedback indicating that a new arrangement is proposed, no information has been received officially. The Social & Environmental Panels don't seem to have met since 2016. It is Mountaineering Ireland's position that there has been little attention paid to this area, and there is currently no clear mechanism for organisations or individuals who are interested and/or concerned to engage with Coillte in relation to each BAU or a woodland within that area.

If there is difficulty in recruiting and selecting representatives for Social & Environmental Panels, a suggestion would be for the Public Participation Network in each county to nominate individuals who are interested in participating in Coillte stakeholder panels. For example, during 2016-17 a Mountaineering Ireland member tried to become involved in the conservation of wildlife habitat in a wood in her local area and was willing to be nominated to the Social & Environmental Panel, but there have been no further developments since then. Recreation, alongside carbon sequestration, is an important element of forestry and public participation and engagement in local initiatives should therefore be secured. To this end, it would be interesting to see another report produced on the economic value of trails and forest recreation on Coillte's estate, as none have been produced since the Fitzpatrick Report of 2005. The data from this report relates to 2003, as that is when the study was commissioned – 18 million visits per annum is still being quoted, yet the figure is 15 years old. It would be interesting to find what the current figures are for visits to Coillte forests so that the amenity value of Coillte's estate may be more accurate.

2. Business Area Units

Coillte's Business Area Units (BAUs) have been reduced from thirteen districts to six BAUs, and each BAU is now a very large area in which it seems impractical and unreasonable to expect individuals who sit on the Social & Environmental Panel to have knowledge and familiarity with the whole area. It also increases the likelihood of forest managers/Estate Management teams not seeing the local effects or changes which locals may, as they are now responsible for a vast and varied area.

3. Native, Broadleaf and Deciduous Species

The current Forestry Programme claimed to meet many of its environmental targets by increasing the cover of native woodland and native tree species within the Irish landscape. With about 10.5% of Ireland's land area under forest cover, blocks of non-native conifers comprise about 75% of the national forest estate, of this 52.4% is made up of just one species, Sitka spruce (Forest Service, 2017). As a non-native species, Sitka spruce supports relatively low levels of biodiversity in Ireland. Mountaineering Ireland therefore welcomes the Department of Agriculture's announcement that the minimum percentage of broadleaves in each afforestation application has changed from 10% to 15% (2018) due to falling short of its obligation under the EU Commission for all planting to be 30% broadleaf species. Less than 2% of Ireland's land area is covered by what is termed native or semi-natural woodland, and much of this is highly fragmented (Cross & Collins, 2017). In the case of native woodland there is a need to increase its cover nationally for biodiversity and wildlife, for increased amenity value and better recreation experiences, and for the many ecosystem services that native woodlands provide as broadleaf species have longer rotation cycles.

4. Upland areas, 'marginal' land and habitat to be protected

It is Mountaineering Ireland's vision that **'Ireland's mountain landscapes will be valued and protected as environmental, cultural and recreational assets'** (Mountaineering Ireland, 2017).

Much of the 'marginal' land designated for afforestation is in our uplands, however steeper land is prone to erosion, affecting water quality, particularly where fertilisation on steep catchments occurs (An Taisce, 2015). Unenclosed land, particularly where it is above 300m, should be conserved for its landscape and amenity value and its habitats. Wetlands provide carbon sequestration, and afforestation, with its associated drainage, on wetland or bog would not appear to contribute to climate change mitigation when considering net carbon storage, particularly due to the short cycle of planting and felling in commercial forestry largely consisting of Sitka spruce plantations.

An example of concern in relation to afforestation is Farbreaga, near Aughavannagh, Co. Wicklow where land was planted in December 2016, mainly with conifers, despite the location being a prospect of special amenity value for its view of Lugnaquilla Mountain (Wicklow County Council, 2010). The planting will obscure the general public's best view of Lugnaquilla from the south, decreasing the amenity value of the site. The same site has also been known since 2009 to host an important breeding colony of Marsh Fritillary

butterfly, and was a wetland of national importance, confirmed in the first wetland survey of County Wicklow conducted in 2011. Communications with Coillte and the Forest Service suggest that all necessary procedures were followed, however the system is clearly failing. Landscapes and habitat of this quality should not be destroyed, not least for planting that may have no net benefit in terms of climate change mitigation. Mountaineering Ireland is concerned that the appropriate level of assessment is not being carried out prior to afforestation developments.

It is also important to consider Ireland's rich natural and cultural heritage. As many archaeological sites are found within forest sites, due regard should be given to heritage sites so that they are not damaged during felling or planting, or become overgrown.

5. Compliance and Monitoring

Mountaineering Ireland is concerned that The Statement of Compliance with the Principles of Sustainable Forest Management (included in each Coillte Strategic BAU plan) does not come across as a convincing statement of compliance, and that it is not clear how compliance is being assessed. This was highlighted in Mountaineering Ireland's November 2015 response to Draft Strategic Plans for Coillte's eight Business Area Units (see attached). Mountaineering Ireland outlined several ways for compliance and monitoring to be strengthened. Coillte's response was that they feel the compliance statement is appropriate, the response included the following: *'Coillte produce a sustainability report, produced annually which outlines social parameters, such as the number of social & environmental panel meetings held annually and attendances at those meetings. Again, Coillte feel it unnecessary to duplicate reporting data which is already in the public domain.'* However as stated above, no Social & Environmental Panel has met since 2016 and no new Panels have been formed. Furthermore, Mountaineering Ireland has not been able to locate any Sustainability Report more recent than 2014 on the Coillte website.

6. Off-road cycling and Mountain Bike activity

Mountaineering Ireland asks that Coillte review its byelaws on off-road cycling and mountain bike (MTB) activity, particularly by allowing cycling on the robust network of forest roads in Coillte's estate. Due to current restrictions it's possible that MTB activity is being displaced onto fragile upland habitats. A relaxation of this policy would facilitate greater recreational enjoyment of Coillte's land and help to prevent further erosion and loss of biodiversity in Ireland's uplands.

7. Access for responsible recreation

As stated in our November 2015 submission, Mountaineering Ireland appreciates that Coillte operates an open access policy for walkers and pedestrian users, however, as became evident in 2012-2013 when the Government was considering the sale of Coillte's harvesting rights, this does not provide the public with certainty of access to this land into the future. It is Mountaineering Ireland's objective to secure a right of public access to publicly owned lands for responsible recreation (MI, 2014). Mountaineering Ireland

asks that Coillte ensures certainty of public access for responsible recreation to this important State-owned land. As there is a lack of security regarding access to privately-owned land for recreation it is important that access to State-owned forestry is secured, not least because of how these lands contribute to national policy objectives of health and wellness through increased physical activity and time in the outdoors. In Northern Ireland there is a public right of pedestrian access to forest land through the Forestry Act (NI) 2010. This may provide a model for the Republic of Ireland.

Coillte is rightfully seen as a leader amongst statutory bodies in Ireland in terms of its recreation policy and recreation management. Investment in the recreation team is urgently required to maintain this status, and also to uphold the quality of the recreation infrastructure that is in place on Coillte lands.

Indeed one of Coillte's own programmes in partnership with the HSE and Mental Health Ireland, is 'Woodlands for Health' a programme for mental health which engages patients in forest activities to enhance their quality of life. This found great success as a pilot project in Wicklow and is now being piloted in other areas (Coillte, 2017), Mountaineering Ireland is delighted to see the expansion of the programme through Get Ireland Walking.

Mountaineering Ireland would like to see a better system for managing felling and public access, whereby signage should be moved so it is positioned close to the area being felled rather than giving the impression the entire forest is closed to entry. We have been notified of cases where signs stated at the main entrance 'No Entry' in large forests. We have also been notified of signs that have been left up long after felling had finished, indicating that public access was not available.

Mountaineering Ireland is supportive of the Dublin Mountains Initiative's proposals for a different model of management for Coillte forests in the Dublin Mountains. The DMI mention that they are '*seeing increasing conflict between so-called normal forestry activity and increasing recreational activity*'. The DMI is calling for a change to Coillte's current clear-felling policy, the remit to Coillte that drives that policy, and also a reconsideration of the vision for the area. The rationale for this is that the amenity value of these forests is greater than the value of their commercial timber crop, and that strategically selected forests should be managed with public enjoyment as a priority.

Further information

Mountaineering Ireland would be happy to elaborate on, or discuss, any of the ideas contained in this submission.

Please contact:

Helen Lawless, Hillwalking, Access & Conservation Officer

Mountaineering Ireland, Irish Sport HQ, National Sports Campus, Blanchardstown, Dublin15.

Telephone: 01 6251115

E-mail: helen@mountaineering.ie

Website: www.mountaineering.ie

References

- An Taisce (2015) *Public Consultation on the Draft Environmental Requirements for Afforestation*, available online: www.antaisce.org/file/1457/download?token=cjwqNPJY
- Coillte (2017), *Health and Wellbeing – Woodlands for Health*, available online: <https://www.coillte.ie/our-forests/public-goods/health-and-well-being/>
- Cross, J.R. & Collins, K.D. 2017. *Management Guidelines for Ireland's Native Woodlands*. Jointly published by the National Parks & Wildlife Service (Department of Arts, Heritage, Regional, Rural & Gaeltacht Affairs) and the Forest Service. Forest Service, Department of Agriculture, Food & the Marine, Kildare Street, Dublin 2, Ireland.
- Dublin Mountains Initiative (2017) *A change of emphasis: a fresh vision for the forests of the Dublin Mountains*.
- Fitzpatrick and Associates. (2005). *The economic value of trails and forest recreation in Ireland*. Coillte and Irish Sports Council. Fitzpatrick and Associates, Economic Consultants, Ladd Lane, Dublin 2.
- Forestry-Service. (2014). *Ireland's Forests Annual Statistics*. Wexford: Department of Agriculture, Food and the Marine.
- Forestry-Service. (2017). *Ireland's Forests Annual Statistics*. Wexford: Department of Agriculture, Food and the Marine.
- Gallagher, G., Dunne, S., Jordan, P. & Stanley, B., 2001. *Ireland's forest inventory and planning system*, Wexford: Department of the Marine and Natural Resources.
- Mountaineering Ireland (2014) *Mountaineering Ireland Strategic Development Plan 2014-2017*, available online: http://www.mountaineering.ie/files/2014101410455_e78883fb.pdf
- Mountaineering Ireland (2015) *Response to Public Consultation from Mountaineering Ireland on Draft Strategic Plans for Coillte's eight Business Area Units (2016-2020)*
- Mountaineering Ireland (2017) *Mountaineering Ireland Vision Statement*, available online: http://www.mountaineering.ie/files/2017619123028_28d4fe41.pdf
- Wicklow County Council (2010) *Wicklow County Development plan 2010-2016, Volume 2, Natural Heritage, prospect no. 59, page 43* - https://www.wicklow.ie/Portals/0/Documents/Planning/Development-Plans-Strategies/National-Regional-County-Plans/Wicklow%20County%20Development%20Plan/Wicklow-County-Development-Plan-2010-2016/Natural_Heritage.pdf