



Mountaineering Ireland's response to consultation on Coillte's BAU Strategic Plans – July 2021

Introduction

Mountaineering Ireland, as the national representative body for walkers and climbers, with over 14,000 members, represents the largest recreation user group of Coillte forests. We also have a role in representing the interests of non-affiliated hillwalkers and climbers, and the wider recreational walking community. The vast majority of Mountaineering Ireland members gain benefit from recreation on Coillte lands, and there is potential to enhance their experiences in the period 2021-2025, and into the future.

Mountaineering Ireland extends its thanks to Coillte for the response received to our May 2020 submission to Phase 1 of this consultation process. This current response has been informed by feedback from a number of Mountaineering Ireland members. In general, members have highlighted the positive contribution that Coillte makes to outdoor recreation in Ireland, however some concerns have been raised with us in relation to Coillte's environmental management.

This submission is presented in three sections:

1. Recreation
2. Forest and land management
3. Stakeholder engagement

1. RECREATION

- a. Coillte is rightfully seen as a leader amongst statutory bodies in Ireland in terms of its recreation policy and recreation management. Mountaineering Ireland is working with Coillte, and other members of Comhairle na Tuaithe, on the current process to develop a new National Outdoor Recreation Strategy. This strategy should be instrumental in securing the increased funding and greater coordination required to support the growth in Ireland's outdoor recreation sector.
- b. Mountaineering Ireland welcomes the recognition in Coillte's February 2021 response that every part of Coillte's estate is used for recreation, and that all forests are managed with this in mind. We are also pleased to note that the planning process for forest operations includes screening for, and protection of, built and cultural heritage features.
- c. We would like to reiterate the very significant role Coillte plays in facilitating access for hillwalkers. Of the 1,500 or so summits of any significance in Ireland, that are included on the MountainViews.ie website, around 40% are principally accessed through Coillte (or Forest Service NI) lands. Many less well-known summits, particularly lower local ones, can only be reached through Coillte forestry.

- d. Participation in recreational walking, hillwalking, running and cycling all increased to unprecedented levels during Covid-19, and research indicates that some of this heightened participation will continue into the future. This will place further demands on Coillte's recreation infrastructure and its recreation team. We welcome Coillte's acknowledgment that there is need to provide significant additional waymarking and information at previously lesser known and lesser-used forests, this should help to spread the load and will encourage use of the forests by less confident walkers. Mountaineering Ireland, with the assistance of its affiliated walking clubs across the country, would be pleased to assist in identifying forests where such waymarking would be beneficial.
- e. Mountaineering Ireland appreciates Coillte's pivotal role in the Dublin Mountains Partnership (DMP). We urge Coillte to work with its partners to secure the funding required to implement the DMP's new strategic plan including the further development of the volunteer ranger programme and engagement in outreach and environmental education.
- f. The need for additional parking for recreation in the Wicklow Mountains has become clearer than ever over the last year and is being examined in the current process to develop a Masterplan for Glendalough and Wicklow Mountains National Park. In relation to parking in Wicklow we wish to highlight two positive projects - the increased parking now available inside the Coillte barrier at Ballinastoe and Coillte's role in the new car park at the Vartry Trails. The willingness to progress increased parking in the vicinity of the Pier Gates if other options don't work out is also noted and appreciated.
- g. An upland path condition survey for the Wicklow Mountains has just been completed on behalf of the Wicklow Uplands Council, working in partnership with other bodies including Wicklow Mountains National Park, Coillte and Mountaineering Ireland. The survey covered 150km of hillwalking routes where erosion is evident; sections of some of these routes are on Coillte land. As remedial work may be deemed necessary or desirable on some of the Coillte sections it would be useful to include reference to the path condition survey in the recreation section of the BAU4 Strategic Plan.
- h. Section 2.3 of the Strategic Plans (Community, Recreation and Tourism Facilities) mentions many activities that are pursued in Coillte forests, but nowhere is there mention of rockclimbing or bouldering. For example, in the Dublin/Wicklow area there is climbing activity on Coillte lands at Carrick Mountain, Barnbawn, Annacleky, Glenmalure, Dunran Glen and the Scalp. There are many more examples throughout the country. These sites need to be recognised and managed so as to facilitate continued access. Mountaineering Ireland would be happy to work with Coillte in identifying climbing sites on Coillte property and lands managed by Coillte.
- i. Mountaineering Ireland welcomes the information in Coillte's February 2021 response that Coillte intends to develop a revised recreation-centric website in 2021. As mentioned in our May 2020 submission some of our members have reported that they find the Coillte website difficult to navigate, and that it would be helpful to have the Recreation Map directly accessible from the homepage.
- j. Mountaineering Ireland has reviewed Coillte's updated policy on Recreational Permits and Licences. We welcome that a fee is not required for walking or hill running events, youth organisations, schools and colleges and for charity events. We note that fees are required in relation to commercial activity. It is Mountaineering Ireland's position that those who work commercially in the provision of outdoor recreation have a significant responsibility to those whose land they conduct their business on to ensure that a positive relationship exists and to avoid any burden or nuisance on the landowner. However, the outdoor activity sector is characterised by seasonal and part-time employment and low pay levels, the sector has also been severely affected by Covid restrictions. Due to all these factors Mountaineering Ireland's current policies do not support any additional rates on outdoor activity

providers other than those that the State demands in taxation and by way of any future national regulation of activity providers. We note that the granting of permission for activities under licence requires insurance cover to be in place. If Coillte's key concern is to be indemnified should an incident occur on Coillte property it warrants consideration that compliance with licensing requirements is likely to be much higher if no fees applied, or if the level of fees was lower.

- k. Mountaineering Ireland is concerned that in all of the draft plans key objective 6 relating to recreation lacks any specific targets (with the partial exception of BAU4 – South East Leinster). The objective itself is worded as an aim:
- ‘Coillte aims to: • Provide a high quality recreation offering to the public. • Maintain all existing recreation sites to the highest standards. • Work in partnership with proactive communities to upgrade amenity sites’

While this is a worthy aim, it is notable that objectives 1 – 5 in each plan include numeric targets. Without specific targets to aim for, there may be a lesser focus on recreation in some BAUs.

Looking at the parameters for monitoring delivery in Appendix IV of these strategies, the measures rely almost entirely on the number of licences issued. This has limited value, as the main recreation activity – walking – is not licensed. To provide a valid assessment of fulfilment of the plan the recreation objective for each BAU needs to include clear targets and the measures for monitoring delivery of the objective should relate to those targets. Mountaineering Ireland has raised this same concern previously, in April 2013 and November 2015.

Performance in the area of recreation could be monitored through measures such as the number of kilometres of trail on the Irish Trails Register, data from people counters on trails, or expenditure on development and maintenance of recreation infrastructure.

2. FOREST AND LAND MANAGEMENT

- a. Mountaineering Ireland welcomed the formation last year of Coillte Nature. In this time of climate and biodiversity crisis it is essential that Coillte, as Ireland's largest public landowner, embraces its responsibility to show leadership by demonstrating transformational change in land management. While the four Coillte Nature projects that we are aware of are all valuable, Mountaineering Ireland believes there should be a greater emphasis on improving ecological practice and the delivery of ecosystem services across the entire Coillte estate. Mountaineering Ireland is aware that Coillte has a mandate under the Forestry Act (1988) to operate in forestry and related activities on a commercial basis, and that any change to that mandate is a matter for Government. Similarly, we recognise that forest policy is set by the Department of Agriculture, Food and the Marine.
- b. As with the recreation objective referred to in 1.k above, there is no clear target included in the draft Strategic Plans for broadleaves or biodiversity. Key Objective 7 ‘aims to maintain and enhance the current level of broadleaves in the BAU’, and Key Objective 8 ‘aims to review, manage and maintain the areas of biodiversity’. This is the same wording that was used for these objectives in the 2016-2020 plans, the measures for monitoring are also the same. In May 2019 the Irish Government declared a Climate and Biodiversity Emergency. Rather than continuing with business as usual, it is incumbent on Coillte to re-evaluate its forest management model in response to these crises.
- c. It is widely acknowledged that mistakes were made in the past, land which should never have been planted was planted, especially peatland in upland areas. Forestry on mountain blanket bog faces

challenges from low nutrient levels, waterlogging and exposure. Research has shown that slightly more than one-fifth of forests on peatland in Ireland are uneconomic and unsustainable¹. As plantations in upland areas mature, there should be a shift from automatically replanting, to restoring areas of deep peat once felling has taken place. These forests require immediate action in the form of alternative management approaches if their peatland ecosystems are to be placed on a more sustainable footing. As site conditions vary, there should be a scientific basis for identifying the most sustainable option for the future management of each forest. The draft Strategic Plans should be revised to include the development and implementation of such a system. It is notable that in Scotland, Scottish Forestry supports applications for felling without conventional restocking on peatland sites that are less suitable for second rotation forestry or where there is a clear benefit of restoration².

- d. Mountaineering Ireland would like to see Coillte's strategic plans include a progressive change in the forest management model across the wider estate towards Continuous Cover Forestry (CCF). We note the reference in the current plans to CCF demonstration sites, however this same reference was in the 2015 plans. There needs to be greater urgency in reviewing and updating Coillte's forest management model. Continuous Cover Forestry produces timber - it also produces more diverse forests, with multiple species of different ages. Such forests are more attractive for recreation, more valuable for biodiversity, more resilient to disease, provide better protection to water and stabilise soils which helps prevent flooding. From a climate perspective, CCF avoids the loss of soil carbon associated with afforestation and clearfell. The long practice of CCF management in Europe, has shown that it is possible to sustain commercial timber production while delivering these multiple benefits to society³.
- e. Consultation amongst Mountaineering Ireland members has shown that there is a strong link between the quality of the natural environment and the quality of people's recreation experiences. Recreational enjoyment can be enhanced through forest planning and management. This could be achieved on a larger scale through CCF, but on a smaller scale, current felling is re-opening vistas in mountain areas; slight adjustments in re-planting would allow some attractive views of mountains and across valleys to be retained.
- f. Damage to fragile upland environments from irresponsible recreational use of off-road vehicles has continued during the Covid period, most notably in the Dublin / Wicklow Mountains, the Galtee Mountains, the Cooley Mountains, and in the Blackstairs. These vehicles often gain access to the uplands through Coillte forests. Further cooperation by Coillte personnel with the Gardaí and National Parks & Wildlife Service is likely to be required to bring this activity under control.
- g. Mountaineering Ireland urges Coillte to strengthen its programme for the control of invasive species, particularly the removal, by every means possible, of Rhododendron, which totally suffocates biodiversity. As Rhododendron is spreading beyond the Coillte estate in many areas there may be value in Coillte working with local communities, including walking clubs, to address this issue.
- h. On a positive note in relation to biodiversity, Mountaineering Ireland welcomes the provision of apiary spaces within Coillte forests, for example, there are multiple sites on both Slievenamon and in the Comeraghs.

¹https://www.researchgate.net/publication/280737133_Irish_Peatland_Forests_Lessons_from_the_Past_and_Pathways_to_a_Sustainable_Future/link/55c8c97308aea2d9bdc91c88/download

² <https://forestry.gov.scot/publications/forests-and-the-environment/protecting-and-managing-soil-in-forests/1-deciding-future-management-options-for-afforested-deep-peatland>

³ https://www.oireachtas.ie/en/debates/debate/joint_committee_on_climate_action/2019-12-11/3/

3. STAKEHOLDER ENGAGEMENT

- a. Overall, Mountaineering Ireland would like to see greater engagement between Coillte and its public stakeholders. Given the large extent of Coillte's BAUs, Mountaineering Ireland urges the adoption of online meetings as part of the Stakeholder consultation process. Any online consultation meetings should include some degree of participant involvement, rather than simply being a reporting exercise. Occasional email updates would be a useful supplement between interactive sessions.
- b. Monitoring and Evaluation – We note that section 4.5 of the draft Strategic Plans states that the results of monitoring will be available at the end of the plan period and published on the Coillte website when the final plans are completed. We were unable to locate these on the website. In the interest of transparency we suggest that in future the Monitoring and Evaluation reports are linked from the Public Consultation webpage and that they are also included in email updates to stakeholders.
- c. Coillte's Map Viewer is a good way of engaging local communities and recreational users with what's happening in the forests that are of interest to them. This is something which should be promoted through Coillte's social media to encourage more people and local groups to engage and to put forward comments and suggestions. On a practical level it is also helpful to be able to see which forests are owned or managed by Coillte and where clearfelling or other operations may be taking place.

For further information contact:

Helen Lawless
Access & Conservation Officer, Mountaineering Ireland
Irish Sport HQ, National Sports Campus
Blanchardstown, Dublin 15

helen@mountaineering.ie / 01 6251103