

COFORD Promotion and Afforestation Working Group (PAW) Forestry Submission with regard to the public consultation on proposed interventions for Ireland's CAP Strategic Plan 2023-2027

Executive Summary

The COFORD Forestry Promotion and Afforestation Working Group (PAW) is a working group of the COFORD Council and comprises a wide-ranging stakeholder membership from across the forestry/woodland sector in Ireland. It seeks to promote forestry and its many benefits, including the implementation of measures to sustain and increase afforestation/woodland creation in Ireland.

The COFORD PAW group wishes to re-emphasise the key role of trees and forests, including both small and larger areas, as a part of sustainable land use that deliver economic, environmental and social benefits while supporting many of the CAP Strategic Plan (CSP) objectives. In addition, given the stark evidence in both the IPCC Sixth Assessment Report and the EPA report on the Status of Ireland's Climate, the group contends that there is a clear imperative to ensure trees and forests are central elements in addressing the huge environmental challenges ahead.

This submission outlines critically important recommendations regarding the potential of forestry to support and complement the CSP and its proposed interventions.

There is a need to **ensure full integration of forests and woodlands with proposed CSP interventions** to support its key ambitions and align with the new 'Green Architecture'. The PAW group is very concerned that competing agricultural schemes (e.g. agri-environmental and organics), under a new CAP Strategic Plan would continue to significantly impact on afforestation and other forestry measures. It is also essential that land planted under afforestation measures be deemed an eligible area under the Basic Income Support Scheme, and that such eligibility continues beyond the term of forestry premium payment. Initial whole farm planning and ongoing forest management are key to developing a valuable forest resource and the practice of farm forestry must be considered as meeting requirements under both the 'active farmer' and 'agricultural activity' descriptions.

The CAP and its associated Strategic Plan need to be configured to ensure that they support key objectives including sustainable afforestation, active forest management and the leveraging potential of forests to grow the national level of wood harvest and thereby contribute to climate change mitigation and the bioeconomy through displacing fossil based material. In this regard, it is essential to ensure that **an appropriate mix of forests and woodland types** and scales are promoted and well funded under future afforestation programmes. While small-scale planting is needed, significant large-scale planting is also required to achieve national planting targets and achieve economies of scale.

The PAW group welcomes the stated objectives of a **new flagship agro-environmental scheme** in contributing to the achievement of national climate targets through a particular focus on tree planting. In this regard, the group highlights the need for **well-supported and appropriate tree planting and woodland creation measures** that will deliver benefits to, and positive attitudes among farmers and landowners. Entry into future agri-environment schemes should not preclude or penalise the owner who subsequently opts for sustainable forestry. Trees and forests deliver a range of highly valuable ecosystem services and their valuable role should be **favourably considered in the development of**

voluntary eco scheme measures. A range of measures is proposed to enhance the quality and sustainability of existing forests and woodland parcels from a Forestry Eco Scheme perspective.

Small farm woodlands will deliver a range of ecosystem services including contributions to biodiversity enhancement, water quality protection and enhancement, and carbon sequestration at farm level, and should be central components within CSP measure and interventions, including agri-environmental schemes. This proposal is specifically aimed at the almost 120,000 farmers who have little or no experience of establishing woodlands. It also needs to be flexible to attract farmers who, up to now, have regarded the government's afforestation programme as too cumbersome for their needs.

CSP initiatives and measures should be considered that promote best practice in terms of the management of woodlands and small groups of trees. An **'environmental enhancement of woodlands scheme/measure'** (or an element of the agri-environment scheme) should also be considered for existing woodlands and forests to facilitate habitat enhancements, including those in environmentally sensitive areas such as Hen Harrier and Freshwater Pearl Mussel habitats.

The group fully acknowledges the importance of protection and appropriate enhancement of grassland habitats including those species rich in nature. The group would also highlight the importance of a **balanced approach with regard to available options for future land use optimisation**, to include forest and woodland creation.

The land sector is one of the key components in reaching a climate-neutral society and economy, as it can capture net CO₂ from the atmosphere and store it in soils and biomass. This mitigation should receive due recognition within the context of the CSP. The necessity to create **direct incentives for the adoption of climate friendly practices by land managers**, which encourage the agriculture and forestry sectors to deliver on climate action and contribute to the European Green Deal, is clearly recognised at EU level. Carbon farming can provide financial incentives for climate-friendly activities resulting in carbon removals, creating new income streams and assisting businesses to contribute to climate action.

The PAW Group advocates support for a **pilot initiative involving the development a network of suitably located demonstration/model forests/woodlands** as positive environments for engagement, awareness raising and learning. These forests would also point the way towards the use of trees as a contributor to climate smart farming, support farmers in moving towards enhanced sustainability within a range of farming systems and act as "hubs" for knowledge exchange.

While the PAW group welcomes the opportunity to promote better forestry supports in the context of the CSP, there is an urgent need to address barriers to achieving our national targets for planting and other licensed forestry activities.

Introduction

The COFORD PAW group welcomes the opportunity to set out critically important recommendations with regard to the potential of forestry to support and complement the CAP Strategic Plan (CSP) 2023-2027 and its proposed interventions. These recommendations include the following areas:

- **Ensuring full integration of forestry with (CSP) interventions**
- **Ensuring a balanced and well supported forestry programme**
- **Forestry inclusion in flagship agri-environmental and climate scheme (AECM)**
- **Forestry inclusion in Voluntary Eco-scheme**
- **Supporting small woodland establishment across interventions**
- **Achieving sustainable land use options**
- **Carbon capture by forests and carbon farming**
- **Enhancing existing woodlands and hedgerows**

Ensuring full integration of forestry with (CSP) interventions

Ensuring full integration of forests and woodlands with proposed interventions of the CSP is essential to support the ambitions to underpin the sustainable development of Ireland's farming and food sector (page 4) and align with the new 'Green Architecture' as outlined in section 1.4. Such integration is vital to support viable farm incomes and enhancing competitiveness, strengthen the socio-economic fabric of rural areas and contribute to achieving environmental and climate objectives at national and EU level.

- The PAW group is very concerned that competing agricultural schemes, under any new CAP Strategic Plan, would impact on afforestation and other forestry measures. It is generally accepted that agricultural schemes, such as GLAS, have significantly reduced planting rates within the current forestry programme. There is concern that should forestry be excluded from consideration in the development of the new CAP Strategic Plan the same outcome will result, with the result that afforestation targets under the Climate Action Plan will fall well short of expectations.
- The CSP outlines how other measures outside of the CAP, such as the provision of national funding under the afforestation programme for alternative land use options such as woodland creation and agroforestry, will combine with measures set out in the CSP to achieve environmental objectives. Full and seamless integration is critical to ensure forest and woodland creation is viewed as an intrinsic and multi-use farm resource that will both complement and support future CAP interventions. To ensure such integration, it is essential that there is no penalty / repayment of any monies received by the applicant should the applicant wish to convert a greater portion of their holding to forest / woodland with relevant CAP schemes/measures. These include future agri-environmental and organic farming schemes. The impact of any proposed measures on potential afforestation should also be fully assessed prior to CSP adoption. This should ensure that other schemes (incl. voluntary environmental schemes) will not militate against the ability to plant should the landowner wish to do so at some stage – e.g. change in farm/family/socio-economic circumstances.
- The PAW group considers it is essential that land planted under afforestation measures be considered eligible area under the Basic Income Support Scheme (5.1(3), page 21) as has been the case under the Basic Payment Scheme. It is also imperative that BISS eligibility continues beyond the term of forestry premium payment. Relevant Articles must also allow the continued payment of BISS to all those forest owners who have qualified to date (since 2009) irrespective of when their forest premium payments end and to landowners who will plant in the future on

current BPS/BISS-eligible land (or according to reference year). Clarification is also required in terms of the 30% allowance of scrub/rushes within individual BISS parcels and how this can positively interact with proposed future woodland creation in such parcels.

- A whole farm planning approach is key to integrating land uses, including forestry, on farms and making best use of available resources from both an economic and environmental perspective. Ongoing and sustainable management of farm forests also yields multiple dividends to owners and contributes significantly sustainability principles. To this extent, the practice of farm forestry must be considered as meeting requirements under both the 'active farmer' and 'agricultural activity' descriptions (Section 5.1, page 18), as it constitutes an important on-farm carbon sink and sequestration measure. These are further essential elements with regard to future uptake and viability of farm forest enterprises. They will also enable a greater focus on the environmental benefits that forests and woodlands provide, including biodiversity, water quality and landscape enhancement.

Ensuring a balanced and well supported forestry programme

The CAP and its associated Strategic Plan need to be configured to ensure that they support key objectives including sustainable afforestation, active forest management and leveraging the potential of forests to grow the level of national wood harvest and contribute to climate change mitigation and the bioeconomy. In this regard, it is essential that a balanced approach be adopted to ensure that an appropriate mix of forests and woodland types are promoted and well-funded under future afforestation programmes. This should include forests that sustainably deliver on commercial timber production as well as those whose focus is on conservation and environmental protection/enhancement. Indeed, new forest and woodland creation projects provide an ideal mechanism to facilitate a sustainable mix of forest types that meet multiple objectives in this regard. While small-scale planting is needed, significant large-scale planting is also required if we are to achieve national planting targets.

The 2017 COFORD report, *Growing the Irish Forest Bioeconomy*, also provides a clear insight into the potential of a thriving, export-led bioeconomy which creates sustainable jobs in rural Ireland and supports national land use, carbon reduction and adaptation objectives. There is a clear need to ensuring a long-term, consistent and growing supply of roundwood to the processing industry by supporting and investing in the national afforestation programme. There is a range of emerging added-value opportunities in the bioeconomy and embedding the cascade use principle for wood resource management and planning in national policy will contribute significantly to the objectives outlined on pages 6/7 of the DSP and under Objective 1.02 of the Needs Assessment and SWOT (NA&S). This crucial climate change benefit, with appropriate supports and promotion, has significant potential in Ireland.

Forestry inclusion in flagship AECM

The PAW group welcomes the stated objectives of a new flagship agro-environmental scheme in contributing to the achievement of national climate targets through a particular focus on tree planting interventions which can contribute significantly to increased environmental ambition (Pillar II interventions, page 9). In this regard, the group highlights the need for well-supported and appropriate tree planting and woodland creation measures that will deliver benefits to and positive attitudes among farmers and landowners. Obj5.011 of NA&S outline the potential of whole farm and land management planning to incorporate smarter riparian buffer design, agroforestry and shelterbelts. Well-designed riparian woodland, for example, will provide an effective intervention to address priority assets such as critical source areas for water. This approach may also be effectively applied at a landscape level to protect and enhance water quality and assist with carbon storage with

potential lands falling in defined co-operation areas facilitated by additional supports (Proposed structure, page 29).

Inclusion of forest measures in Voluntary Eco Schemes

Trees and forests deliver a range of highly valuable ecosystem services and should be favourably considered in the development of voluntary eco scheme measures. Entry into future agri-environment schemes should not preclude or penalise the owner who subsequently opts for sustainable forestry. A similar scheme (or an element of agri-scheme) should also be established for existing woodlands and forests to facilitate environmental enhancements on such sites. Consideration should be given to a separate forestry eco-scheme when developing appropriate eco schemes under Pillar 1. The following suggested measures would be effective in enhancing the quality and sustainability of existing forests and woodland parcels from a Forestry Eco Scheme perspective.

- Appropriate management of Internal forest hedgerows
- Retention/protection of existing native woodland habitats
- Appropriate planting of suitable native fruit-bearing and flowering species
- Enhancing of existing identified habitats and wildlife corridors
- Maintenance of open areas with deer lawns and back stops
- Pruning of trees for better stem and wood quality and for opening up the forest floor to allow vegetation growth
- Installation and maintenance of water protection features e.g. silt traps
- Enhancement of forest entrances and access routes
- Participation in science-led climate mitigation and other ecosystem services research projects/surveys
- Hosting of knowledge transfer initiatives to promote multi-purpose forests
- Retention of existing native woodland habitats

Small woodland establishment

Small farm woodlands will deliver a range of ecosystem services including contributions to biodiversity enhancement, water quality protection and carbon sequestration at farm level and should be central components within CSP measure and interventions including agri-environmental schemes. The potential benefits of such initiatives are outlined under Obj5 .010 of the Needs Assessment and SWOT. Opportunities of such planting of trees and small woodlands will serve as an important opportunity and stepping stone to introduce farmers, including those with some experience of planting and establishing woodlands, to forestry, but is specifically aimed at the almost 120,000 farmers who have little or no experience of establishing woodlands to the multiple benefits that can accrue. This proposal has relevance to farmers throughout the country and is adaptable to grassland fields with potential for environmental improvement and small areas outside the field system to allow woodland creation. It is also flexible to attract farmers who, up to now, have regarded the government's afforestation programme as too cumbersome for their needs.

This submission acknowledges the challenge in encouraging all farmers to plant some of their land and differs in terms of the proposed scale of planting and species composition. A new 'small planting' measure can incorporate a range of tree planting options including small woodland creation, native conifer and broadleaf establishment and planting designs that protect and enhance the environment e.g. planting of hotspots to mitigate leaching of nutrients, establishment of effective shelter belts and individual farm tree planting. Agroforestry and permaculture food forests allow trees to also be part of an integrated food production system. A range of such planting initiatives will also connect existing or newly created habitat features such as hedgerows and deliver multiple biodiversity benefits. It is critical that a 'small planting' measure has an efficient and simple approval process.

The innovative approaches adopted by EIP project such as [the Inishowen Upland Farmers Project](#) may provide a template for the planting of trees, hedgerows and farm woodlands (agroforestry) on farms based on a farm needs analysis to deliver on environmental sustainability.

To create the necessary efficiencies, it may be necessary to create structures, such as farm/forest owner collaborative type schemes, that allow neighbouring landowners to work together to develop suitable catchment-type forestry proposals. These have the capacity to provide increased benefits such as enhanced biodiversity through habitat corridors, water amelioration and economies of scale to the owners and to the environment.

Sustainable land use options

The PAW group fully acknowledges the importance of protection and appropriate enhancement of grassland habitats including species rich in nature. The group would also highlight the importance of a balanced approach with regard to available options for future land use optimisation. This is to help ensure that land types that are appropriate and suitable for forest and woodland creation are not unduly restricted from such use as an unintended consequence with regard to potential expansion of characterisation of marginal grassland areas. It may be worth assessing the implications of any such restrictions.

Forest carbon capture and carbon farming

The land sector is one of number of areas for reaching a climate-neutral economy, because it can capture CO₂ from the atmosphere and this should receive due recognition within the context of the CSP. The necessity to create direct incentives for the adoption of climate friendly practices by land managers, which encourage the agriculture and forestry sectors to deliver on climate action and contribute to the European Green Deal, is clearly [recognised at EU level](#). Carbon farming can provide financial incentives for climate-friendly activities resulting in carbon removal and storage, creating new income streams and assisting businesses to withstand the effects of climate change. Planting of new forests, restoration of degraded forests, improving the management of existing forests and supplying biomass for the production of long-lasting bio-based products are clear examples of effective farming practices which need to be appropriately supported and rewarded. For example, the recent EU report, [Technical Guidance Handbook – setting up and implementing result-based carbon farming mechanisms in the EU](#), highlights agroforestry as one of five ‘promising areas’ that deliver climate related benefits and also as a management practice that benefits soil organic carbon levels.

Enhancing existing woodlands/hedgerows

CSP initiatives and measures should be considered that promote best practice in terms of the management of woodlands/thickets. An ‘environmental enhancement of woodlands scheme/measure’ (or an element of the agri-environment scheme) should also be considered for existing woodlands and forests to facilitate enhancements on sites, including those in environmentally sensitive areas such as in Hen Harrier and Freshwater Pearl Mussel sites. Proposed measures include appropriate regeneration /restructuring of existing forests and woodland, stock proofing existing groves or woodlands to enable natural regeneration and implementation of eradication/control measures on invasive plant species.

Dense and appropriately managed hedgerows can often include elements of linear woodlands, connecting farms and acting as valuable wildlife and habitat corridors. They also play a crucial role in sustainable farmland management for climate and biodiversity benefits. There is also significant potential for appropriate hedgerow landscaping and management to counteract the impacts of ash dieback disease, which can provide opportunities to replace affected ash trees with other appropriate native species.

Inclusion of working coppices is proposed as an additional appropriate measure – e.g. hazel, willow, ash and opportunities for woodlands to be coppiced and let grow as a model of sustainable wood production, with multiple appropriate uses.

Knowledge exchange/education

The PAW Group advocate support for a pilot initiative involving the development a network of suitably located demonstration/model forests/woodlands as positive environments for engagement, awareness raising and learning. These forests would also point the way towards the use of trees as a contributor to climate smart farming, support farmers in moving towards enhanced sustainability within a range of farming systems and act as “hubs” for knowledge exchange.

Educational programmes such as [An Choill Bheag](#) (LEAF) can provide a template and be easily adjusted to accommodate the needs of farmers, landowners and students. Such programmes place emphasis on practical skills to create and manage woodland habitats and hedgerows connecting existing habitats, encouraging environmental education on all functions of forests through awareness raising and promoting relevant Citizen Science initiatives to monitor and record habitat quality and biodiversity on site, e.g. wild plant and wild animal surveys, monitoring water, soil and air quality.

It is proposed that small-scale local tree nursery demonstration sites be integrated into this proposal. Native trees of native/local seed provenance are crucial in terms of healthy biodiversity and protecting/creating stable ecosystems. The growing of trees from seed for supply to local farms for planting could increase their resilience and reduce dependence on imported stock.

Immediate need for significantly increased planting uptake

Whilst the COFORD PAW group endorses the effort to promote better supports for the forestry sector in future as outlined in the CSP, immediate and urgent efforts are required to address and reinvigorate the current low levels of forest and woodland creation and the significant barriers involved. The achievement of these planting targets is critical not only for Ireland’s indigenous forestry sector, but also in terms of its vital role in supporting rural economies and rural development, renewable energy provision and climate change mitigation.