Implementation of the biodiversity guidelines in current Irish afforestation

Transcript of presentation made by INFF Coordinator Ian Wright to COFORD Seminar 'Opportunities for biodiversity enhancement in plantation forests' 24 October 2002 Cork

I would like to thank COFORD for giving me the opportunity to present this paper. I am not a forester and have no scientific training - I happily admit that. What I hope I have got to offer is a good measure of common sense and my observations from creating wildlife habitats over the last 15 years.

I am one of a group who edit and produce the weekly *Forest Network Newsletter* - a newsletter that 1 know is eagerly awaited every Wednesday morning by many involved with forestry in Ireland, and I hope I am speaking for the majority of the NGOs today. The Friends of the Irish Environment asked me to make this presentation. However, I should stress that the observations I make are my own.

I have been asked to talk about the implementation of the biodiversity guidelines. I think first we have to look at why the biodiversity guidelines exist and why abiding by them are so important in the Irish context.

As the recent conference on sustainable forestry in Ennis illustrated so clearly, Ireland is totally out of line with international forest practices. Other European countries have accepted the disastrous environmental and economic consequences of plantations of non-native trees designed for clearfell. At Ennis, the Polish delegation apologised for the fact that because of earlier mistaken policies they still have to clearfell areas of up to 4.5 ha, while Ireland is still advocating clearfell coupes of 25 ha.

I know this is not the forum to discuss these policies but because the Forest Service is obsessed with planting plantations of trees to achieve its strategic plan, the areas retained and managed for biodiversity have far more importance and significance than anywhere else in Europe.

The Forest Service *Forest Biodiversity Guidelines* state that good forest practice coupled with adherence to the guidelines will conserve and enhance the biodiversity value through the whole forest. Initially the Forest Service stated that, as the guidelines had been explained to the Forest Service inspectors, they were confident the guidelines were being adhered to. However, Hugh Scanlon, writing in the *Farmers Journal,* made it very clear to what extent they had been ignored when he stated that: 'the guidelines published over a year ago will be strictly implemented for the first time in the current planting season'.

Following the introduction of the guidelines there seemed to be a broad consensus among most contractors about their spirit and meaning, but they were not incorporated into practice for fear that most Forest Service Inspectors would not approve such plans. The confusion over the interpretation of these plans was obvious in that every representation we made to the Forest Service returned different answers. In the end, the Chief Auditor admitted that the mapping protocols used by the Department meant that 'some single or some linear features are too small to be relevant on a 6 inch map' and that their maps 'do not facilitate showing biodiversity plot data'. (So too for landscaping.) How do you record rock outcrops, ponds, marshes, bogs, scrub, watercourses, or even pockets of existing broadleaves on a 6 inch map? If these features cannot be mapped, then how can they be monitored? Since the conference, new mapping procedures and legends for biodiversity were introduced. I will talk later on about whether these are adequate.

During the information day on the *Forestry Environmental Guidelines* the Chief Environmental Officer of the Forest Service illustrated how they would impact on a theoretical 100-acre diverse conifer site. Fifteen percent of" the site must t5e ideniiiTea' i6r biodiversity, 10% for broadleaves, and 20% of the remaining 75% to be planted with diverse conifers.

In response to the dismay of the Irish Farmers' Associations delegate who asked : 'no commercial return from 25% of the site?' the Chief Forestry Inspector, insisted that it wasn't as bad as it looks, because it has always been assumed that roads, turning bays, ridgelines and firebreaks have accounted for 15% of the site, and to remember that it is only sites over 10 hectares that have to conform with the 15% ruling, and with the average site at 8 ha this shouldn't be a major concern.

The 1995 Jakko Poyyry report on which the strategic plan is based recommended that 25% of every site should remain unplanted. **Dr** Susan Iremonger, who prepared the *Forest Biodiversity Guidelines,* writes: 'The point of having Nature Conservation Areas is to provide an area where the trees are allowed to grow old and a forest ecosystem develop, like that of a natural forest'. She recommended keeping 5% to 10% of each forest as open spaces for the feeding of birds and bats, and for shrub and herb species that are intolerant to dense shade but can flourish in the open spaces within a forest. She used the term 'Nature Areas'. The fact that this was changed to 'Retained Habitat and Open Space' in the guidelines speaks volumes. She goes on to say 'Nature Areas are parts of the forest that are not subjected to the same forestry operations as the rest of the forest area ... they should not be logged or subject to other forestry operations and so cannot form part of any commercial broadleaf component of a plantation. The management of these areas is critical to their success'.

Surely the open spaces of Iremonger's Nature Areas cannot include ridgelines, forest roads, turning bays, landing bays and their associated margins - let alone firebreaks, which are scraped clear of all living vegetation every two years. To Coillte's credit, they say they don't include roads etc. in the open spaces. Coillte initially stated they were not bound by these guidelines, and intended to 'define' 15% of an FMU(Forest Management Unit)as Retained Habitat, arguing it would be uneconomic to plan for 15% biodiversity in each site. The Forest Service has confirmed to us and Coillte that Coillte do in fact have to abide by the guidelines.

These days Coillte state that they must be interpreting the biodiversity guidelines correctly as the Forest Service is passing their Farm Partnership sites.

Many private contractors planting for farmers have told me they feel they are at a disadvantage as they have to put in 15% ABE while others are allowed to plant 'every damn inch!" I have been shown sites where this does seem to be the case. However, without the maps and legends from the application it is impossible to work out whether this non-compliance with the guidelines is being approved by the Forest Service or the site maps are being ignored when planting. In the absence of transparency, we have issued a Freedom of Information (FOI) request for the maps which to date have not been made available by the Forest Service. People within the Forest service have made it very clear to me that they do not feel NGOs have any right to check on these sites.

An Taisce (Ireland's oldest and largest environmental organisation) has recently been given a monitoring role under the Forest Service new consent procedures in relation to some afforestation applications. This is An Taisce's assessment of the consent system to date: the new legislation has a provision for consultation with the general public and also with prescribed bodies. Under this new legislation, introduced last December, An Taisce has approximately 10% of the new forestry applications referred to it. Although An Taisce's specific brief is for sites with amenity and archaeology considerations, it does not limit its comments to these two areas. They

have commented on acid-sensitive areas, water quality, designated nature conservation areas, cumulative impacts of forestry plantations, as well as the compliance of the application with the forestry guidelines themselves.

Initially, applications received from the Forest Service generally omitted page 3 of Form I, which would have allowed them to determine fairly quickly the key points to be examined in relation to individual applications. This page detailed silvicultural and environmental considerations and answers to questions on water quality, nature conservation designations, landscape considerations and archaeology. It was only following a face-to-face meeting with representatives from the Forest Service in July that they agreed to send this page.

The Forest Service were upset that An Taisce intended to take its monitoring role seriously, that it expected responses to its suggestions and details of the decisions the Forest Service made. The Forest Service stated they hoped they could have an arrangement as they have with Duchas and the Water Authorities.

Very few of the applications received before July had areas of ABE marked. Of the 48 applications received in the last three months, only ten had the map and legend for ABE and most of those had no more than a tick - no breakdown of open spaces, no description to help identifying ABEs on the map. A six inch map gives little opportunity to identify small features so the legend is essential.

An Taisce is worried that so many applications are coming in without ABEs marked. The Forest Service comments give no indication that it is insisting on these before passing the applications. With no transparency it is impossible to monitor these.

The guidelines also recommend occasional cutting on retained areas of unimproved grassland, to encourage wildflower development. I would love to be proved wrong but I have yet to see an area of unimproved grassland left, let alone managed for wildlife.

They also recommend gap planting and layering to rejuvenate declining hedgerows. Again, I would love to be proved wrong but none of the contractors I have spoken to have ever planted hedges or for that matter planted any of the woodland trees and shrubs like wayfaring tree, spindle, guelder rose dogwoods or even whitethorn or blackthorn.

To me one of the most important elements for biodiversity has to be water. Unfortunately there seems to be an obsession with draining all the water off sites. The guidelines recommend creating small ponds and areas over 60 ha should be served by reservoirs. In the thousands of acres of plantations around Rock Chappell I have yet to discover a reservoir or pond. The guidelines are there, I believe the will is there from most of the contractors, and I know there are many digger drivers who would love the chance to create ponds and lakes. The costs would be minimal. All that is lacking is the will of the Forest Service to both encourage and enforce compliance with the guidelines.

At a meeting I had with An Taisce and the Forest Service in July this year, a Forest Service inspector stated that 'on sites less than 10 ha you retain what biodiversity there is but you do not have to enhance any of the area for biodiversity. This is adequate for such small areas'. I stated that: 'On a green field site with no existing hedges, a percentage must be set aside for biodiversity'. He replied: 'No, the farmer is already losing 10% for broadleaves. I would not ask him to lose more of the site for biodiversity'.

I asked him to confirm his interpretation of the biodiversity guidelines in writing. By a strange coincidence, I received his reply the day before I left to talk to the EC commissioners last week. (Good to know the jungle drums are still working!) He stated: 'In sites less than 10 ha in area, the open space element should be designed in conjunction with neighbouring land-use. Such small sites surrounded by open ground (non-forested land) consisting of grazing or tillage fields do not require open space for biodiversity purposes in addition to that which

is normally provided for watercourses, roadways or rides.'

He is suggesting that the green field surrounding a forest negates the need for allowing areas for biodiversity within the plantation. Let us look at this green field. It more than likely has three cuts of silage taken of it each year with the circus of heavy machinery that modem harvesting requires, it will have at least three applications of fertiliser and more than likely at least one application of weedkiller, and just to make sure the field is as nature intended, the cows will have been worm drenched just before they are put to pasture which will wipe out the few remaining earthworms in the soil. This is the area the Forest Service are saying allows us to ignore the biodiversity guidelines and plant every square inch of a site.

At the conference in Ennis, a representative of Irish Timber Growers'Association stated that a recent study has proved that a Sitka spruce plantation has more biodiversity than the green field I have just described. I am sure he is right. A Sitka spruce desert supports more than a green desert, but surely the question that should be being asked and the comparisons that should be made should be between the richness and variety of biodiversity and habitat that are being lost forever and plantation forestry. I think it is safe to assume that by far the majority of planting is on the species rich marginal lands -our remaining reserve of biodiversity.

I would like to talk briefly about the Native Woodland Scheme. Although the Native Woodland Scheme is not immediately tied up with the biodiversity guidelines, it is about preserving and enhancing our remaining biodiversity. One of its aims is the phased long-term conversion of mixed and conifer forests to native woodland status. It states that all management inputs to the site must be kept to a minimum, avoiding unnecessary operations and blanket prescriptions, sensitively implemented to minimise disruption and disturbance.

Bearing this in mind I would like to talk briefly about Shippool Wood, just down the road from here at Innishannon on the banks of the Bandon River. It is an ancient woodland that was clearfelled in the 40s and replanted with Norway spruce and Scots pine in the early 50s, adjoining NHAs and a proposed SAC. Coillte had originally planned to clearfell this site, leaving the broadleaves, and replanting with Sitka spruce. Following public representations they have now stated they intend to clearfell (leaving the broadleaves) and apply for the Native Woodland Scheme. The Coillte company secretary said it could take many months if not years to be passed for this grant, and that Coillte currently had hundreds of hectares of clearfelled wood sites awaiting this grant. This suggests this not an isolated case. Once again it seems that, at the expense of biodiversity, the guidelines are being manipulated to allow a predominantly coniferous site to be clearfelled and then apply for the Native Woodland Scheme.

The fact that this could have a serious negative impact on the biodiversity of ancient woodland sites is borne out by a recent research led by Oxford University Forestry Institute. They found that if conifers (on ancient woodland sites) are felled and replaced with more conifers, then the wildlife dependent on ancient woodlands will not survive. They go on to say 'if we shift our understanding of restoration to mean creating conditions that will conserve and enhance ancient-woodland communities, it becomes clear that continuous-cover forestry is generally better. Restructuring the wood by degrees avoids sudden, dramatic , change, and allows the sensitive woodland species to survive and expand under the protective embrace of the tree canopy'. Which, of course, is what the Native Woodland Scheme guidelines advocate.

To conclude: enforce and abide by Forest Service guidelines. I would also like to appeal to the Forest Service to simplify the guidelines, get rid of the loopholes so that all sites have to have 15% Area of Biodiversity. The biodiversity guidelines have made a difference. Riparian zones are for the most part being respected. Scrub is being retained. All guidelines are bound to have weaknesses and potential loopholes but if the guidelines are taken on board and implemented with the vision that Dr Susan

Iremonger had when drafting them, if the Forest Service's Chief Environmental Officer's interpretation of them could be seen to be applied through the whole process from mapping and legends to planting, if a transparency were introduced into the system that would allow monitoring of these guidelines without having to resort to FOI for every scrap of information, the country as a whole would benefit from the expertise of the scientists gathered here today.