



COILLEARNEACHA DÚCHASA NA HÉIREANN

Deputy Chair Micheál Ó Cinnéide
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c/o Frank Donohoe
NPWS Review Secretariat

April 2021

Ref: NPWS Review2021 submission from Woodlands of Ireland

Dear Micheál, thank you for the opportunity to make a submission on the Review of the NPWS 2021.

Woodlands of Ireland is a not-for-profit charity dedicated to native woodlands. It is an inclusive organisation whose primary objectives are to generate awareness of native woodlands amongst policy makers and the general public. We work with many stakeholders to develop projects and sustainable management strategies aimed at ensuring the future viability of native woodlands.

We have been funded jointly by NPWS, Heritage Council and Forest Service for over 20 years. NPWS staff have had significant inputs into the development of the Native Woodland Scheme measures and related training since our beginning as an organisation in 1998.

We would like to see a much strengthened and renewed Nature Conservation/ Biodiversity Protection Service/Agency emerging from the Review given the impact that the Climate and Biodiversity Crises are having on habitats and species.

We would like to receive an interview as part of your consideration of our submission please.

Regards

Joe Gowran CEO

joegowran@woodlandsofireland.com

NPWS Review submission from Woodlands of Ireland April 2021

Preamble: The following observations and suggestions if taken on board, are intended to add to the capacity of existing and newly recruited staff to carry out their roles more effectively.

Key point: We see a role for **directly employed Woodland Managers** within the Reviewed Service/Agency because in the DRAFT PRIORITISED ACTION FRAMEWORK (PAF) FOR NATURA 2000 in Ireland (NPWS 2020) the condition of most of the woodland owned by NPWS continually records Bad status in relation to the standards required by the EU Habitats Directives. In addition there are a number of active infringement notices* served by EU courts on Ireland regarding implementation of the Directives:INFR(2015)2006, INFR(2020)2110, INFR(2018)2319

Code	Short/common name	2007	2013	2019
91A0	Old oak woodland	Bad	Bad↑	Bad↓
91D0	Bog woodland*	Inadequate	Favourable	Favourable
91E0	Alluvial woodland*	Bad	Bad↑	Bad↓
91J0	Yew woodland*	Bad	Bad↑	Bad=

The above table in the PAF report is followed by the statement: *'This indicates that additional efforts will be required to optimize woodland management regimes in at least some of the areas covered by the 91A0, *91E0 and *91J0 habitats.'* c.50% of the 9,679 hectares of these woodlands are owned by NPWS and a significant amount of the remainder is owned by another state body Coillte.

'Of the six National Parks in Ireland, three contain substantial areas of native woodland, those in Killarney, Glenveagh and the Wicklow Mountains. Of the network of 78 Statutory Nature Reserves, 33 sites have been deemed to contain woodland of conservation value.' (Perrin et al 2008)

Although *'NPWS employs a range of staff throughout its organisation, in various locations across Ireland, including Conservation Rangers, Division Managers, Administration staff, Education Officers and Scientists. All play a vital role in monitoring, understanding and protecting the biodiversity of Ireland'*, (<https://www.npws.ie/work-npws> 2020) to the best of our knowledge, there are no staff directly recruited with the skill set to actively manage sections of the c.6,000 hectares of woodland owned by NPWS or to support the work of the scientific staff from other disciplines that rely on healthy woodland, both in the public and private sectors, to meet their objectives.

We would advise that the NPWS should develop its' own woodland management training facilities regionally and build a cohort of woodland managers attached to specific woodland sites.

We see this as having benefits and add value to both the nature conservation and forestry sectors.

We would like to assist the Service/Agency in building that training capacity.

An opportunity to discuss this further as part of the Review would be appreciated.

* <https://www.irishtimes.com/news/environment/commission-to-refer-ireland-to-court-of-justice-of-the-eu-over-failure-on-conservation-measures-1.4294916>

A suggested specification for Woodland Manager recruits:

The candidates should be familiar with many of the following:

- Woodland and tree cover ecology
- Sustainable Forest Management (SFM) meaning a balance between Economic, Social and Environment components of Woodland Management
- National Forest Standard/Code of Best Practise
- National Biodiversity Action Plan
- National Climate Action Plan
- Water Framework Directive compliance
- Habitats and Birds Directive species and sites
- NPWS Farm Plans
- The seasonal timing of the implementation of contracts, including surveys and groundworks.
- The duration and steps involved in the DAFM NWS application process
- Afforestation schemes inc. Native Woodland
- Reafforestation inc. Native Woodland
- Agroforestry and Agri-environment schemes
- Neighbourwood Scheme
- Continuous Cover and Native Woodland conservation measures.
- Roads and Felling control regulations
- The situations/ zones where tree cover is not appropriate for SFM.
- AA, NIS, EIA and SEA processes
- Volunteer management
- Preparing data for woodland inventory
- Firebreak installation and maintenance

AA, NIS, EIA and SEA processes:

Woodland managers could support other scientific staff of the NPWS in assessing applications referred to NPWS from other public bodies.

Volunteer management:

The use of volunteers to supplement direct staffs inputs to controlling or eradicating invasive species, has been a feature of NPWS life seasonally for many decades. This is likely to continue to be the case indefinitely because of the severity of the Rhododendron infestation in Killarney <https://www.irishtimes.com/news/environment/rhododendron-an-ecological-disaster-in-killarney-national-park-1.3894358#.XN-hgLSDHol.twitter> and to a lesser extent Glenveagh. The suggestion is to form an invasive species volunteer force using an organisational structure akin to and potentially an extension of the Civil Defence but given payment for work camps equivalent to the Reserve Defence Force <https://www.rdfra.ie/rates-of-pay> . Woodland managers in conjunction with scientific staff would identify the geographic areas of priority on an ongoing basis and co-ordinate actions with the volunteer force.

Development of Woodland management training facilities at or near each National Parks:

Glenveagh, Burren, Ballycroy (Enniscoe), Killarney and Wicklow all have the potential or existing facilities suitable for developing training locations as part of a national network. An apprenticeship approach for the woodland teams combining modules in the European Framework of Qualifications and periods of practical work experience in several NPWS woodland settings should be looked at soon after the initial Woodland Managers are recruited.

Woodland Inventory: The total area of NPWS woodland is not readily accessible and therefore a comprehensive inventory of the c.6,000ha is recommended as a baseline for developing systematic individual management plans for each compartment of each site. There is a legacy area of conifer stands of c.1,000ha that could be assessed for their suitability for conversion to woodlands of predominantly native species or restore to other habitat types.

Native Woodland Scheme: NPWS has an allocation of c.600ha of funding available from the Forest Service under this scheme in the period 2015-2020, which is c.120ha per annum x €5,000 = €600,000 plus an allowance for fencing. This is likely to continue beyond 2023 and should be fully availed of by Woodland Managers. Up to 30% of the grant can now be claimed for management costs*, which is enough, in simple terms, to employ 3 Woodland Managers at a gross cost of €60,000 incl. employers PRSI, who then could be working gangs/contractors on an average of 40ha of woodland each per annum.

* See Appendix 1 below.

Conclusion: The legacy of the division of the Forest and Wildlife Service Dept. into NPWS, Coillte and the Forest Service in 1989 continues. The NPWS has been shunted about from one Dept to another since then, reflecting the realpolitik of concern within state institutions for the conservation of habitats/species and the people who provide the service. Woodland Conservation has been low on the list of state priorities across all Depts**. A newly constituted Nature Conservation/ Biodiversity Protection Service/Agency can turn this around, in part by employing Woodland Managers to implement management plans for every state owned woodland site and developing on going in house training programmes to ensure sustainable woodland management into the future.

Infringement proceedings reflect badly on the reputation of a state and more so when that states' parliament declares both Biodiversity and Climate Change crises. The review should indicate a genuine intention to empower the NPWS or its' successor to thoroughly implement its' mandate of conservation of protected species and habitats.

** <https://environmentalpillar.ie/nature-scorecard-shines-light-on-irelands-failure-to-protect-its-natural-heritage-and-internationally-important-habitats-and-species/>

Appendix 1:



An Roinn Talmhaíochta,
Bia agus Mara
Department of Agriculture,
Food and the Marine

21st April, 2021

Circular 04/2021

To all Registered Foresters

Re: Native Woodland Conservation Scheme – management costs, income from timber & felling licence requirements

The following amendments apply with immediate effect to the Native Woodland Conservation Scheme (NWS Conservation), as set out in the scheme manual *Native Woodland Conservation Scheme: September 2015* and Circular 05 of 2018. *Native Woodland Conservation Scheme: September 2015*, with updates set out in Circular 05 of 2018.

Management costs

Section 5 of the 2015 scheme manual lists operations eligible for support under the Scheme. Up to 30% can now be claimed as management costs on top of other eligible costs incurred as part of the project. The grant is capped at €5,000/ha of eligible area. Itemised invoices for each of the eligible costs incurred must be submitted at Form 2 stage, to verify management costs claimed.

The Form 2 must list all eligible costs incurred *plus* a statement of projected costs up to the 2nd instalment. The 1st instalment will comprise 75% of this amount (up to a maximum of €3,750/ha) plus a fencing allowance (as set out in Circular 05 of 2018), and the 2nd instalment will comprise 25% of this amount (up to €1,250/ha).

Income from timber revenue

Circular 05 of 2018 details two categories under NWS Conservation: 'High Forest' and 'Emergent Woodland'. Under 'High Forest', where the intention of the project is to replace an existing conifer plantation with native woodland at reforestation, a standard reforestation cost of €2,000/ha will be deducted from the total eligible costs submitted and the grant calculated on the balance, subject to the maximum rate of €5,000/ha. Income from the clear felling of the original crop will not be deducted.

In relation to projects involving the removal of single or small groups of trees from an existing native woodland high forest (e.g. to eliminate non-native tree species), income from the sale of the resulting timber will not be deducted. However, all tree felling must be fully described in the Form 1 / Native Woodland Plan and deemed wholly appropriate for the restoration of the native woodland.

Felling licence requirements

If required for any tree felling activity envisaged under the project, a valid application for a tree felling licence must be submitted either in advance of, or in tandem with, the submission of the NWS Conservation application. Applications under the scheme will not be accepted after a felling licence has been issued. DAFM will only consider exceptions to these rules where extreme ecological sensitivities apply.

Conclusion

The above amendments to NWS Conservation will be kept under review by the DAFM. Finally, attention is drawn to Circular 05 of 2018, which includes a revised NWS Framework and NWS Conservation Form 1/Native Woodland Plan template, both of which must be used for all NWS Conservation applications.

Ann Cunningham
Asst. Principal Officer
Forestry Division

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