

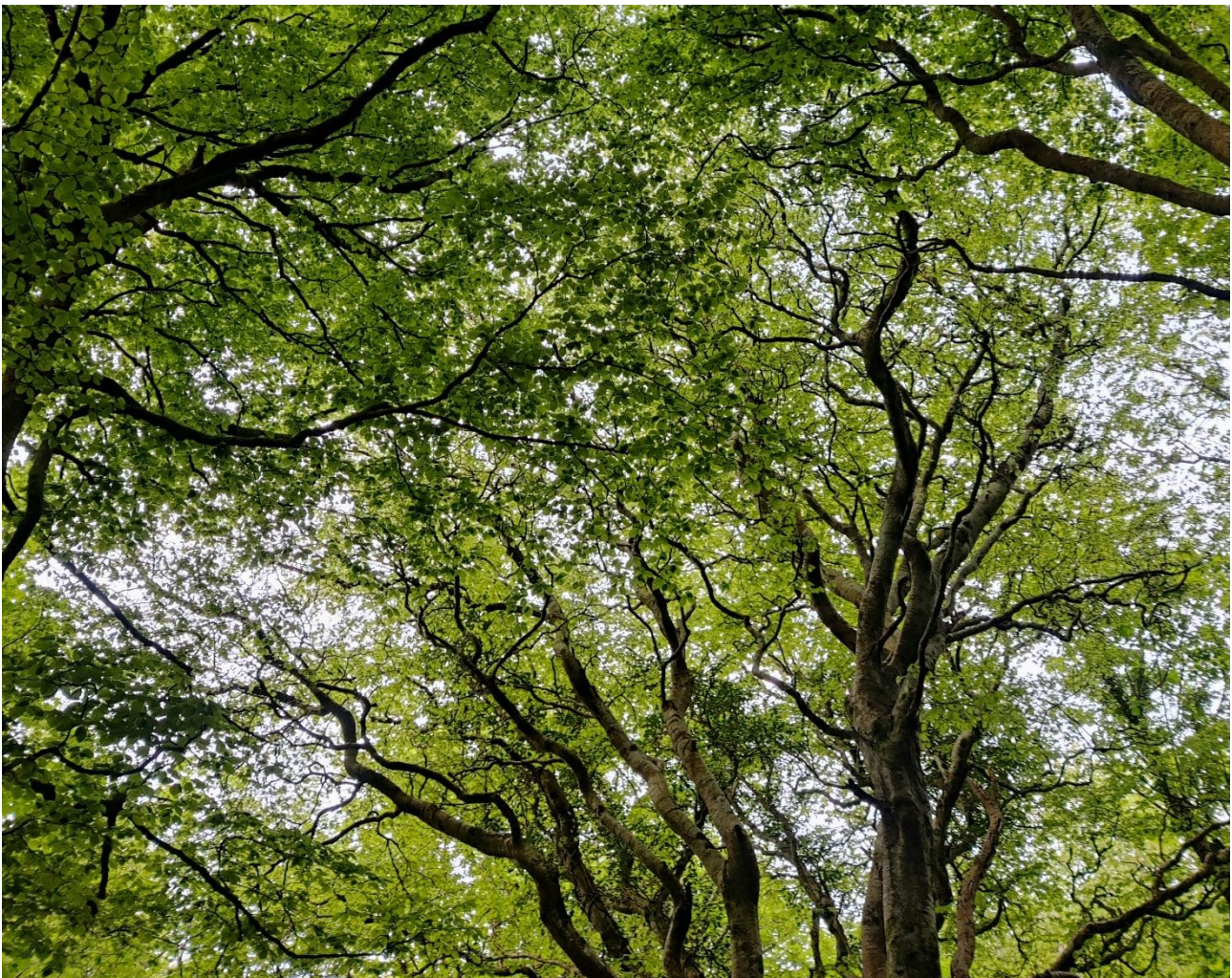
Coillte

Forest Estate Strategic Land Use Plan

Public Consultation Response Report

Reference: Ref 1

2 | 12 December 2023



This report takes into account the particular instructions and requirements of our client. It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

Job number 94083-00

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Contents

| | | |
|----|---|---|
| 1. | Introduction | 1 |
| 2. | Consultation Requirements | 1 |
| 3. | Overview of Submission Responses | 3 |
| 4. | Summary of the Public Body (Including Statutory Consultees) Submissions | 4 |
| 5. | Summary of Non-Statutory Submissions | 7 |

Tables

| | |
|---|---|
| Table 3.1 Breakdown of Submissions Received | 3 |
|---|---|

Figures

| | |
|---|---|
| Figure 2.1 Copy of the Public Advertisement Pertaining to the Public Consultation | 2 |
| Figure 3.1 Breakdown of Submissions Received | 3 |
| Figure 3.2 Submissions: Key Themes | 4 |

Appendices

| | |
|---|-----|
| Appendix A | A-1 |
| Detailed Submissions Received from Public Bodies (Including Statutory Consultees) | A-1 |

1. Introduction

Coillte, in cooperation with Arup, has prepared Coillte's Forest Estate Strategic Land Use Plan (referred to hereafter, interchangeably as 'the FESLUP' or 'the Plan') 2023-2050. The FESLUP sets out high-level policies and actions that will enable the delivery of the ambitions of Coillte's 'Strategic Vision for Our Future Forest Estate' (referred to hereafter as 'Coillte's Strategic Vision') which was published by Coillte in 2022.

The FESLUP was subject to Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA), and the draft plan and environmental documents were on public display for a period of six weeks, in accordance with the requirements of the SEA legislation. During this time, the general public and the SEA Statutory Consultees were invited to make submissions and observations on the documents, for consideration by Coillte.

The purpose of this report is to summarise the submissions received as part of the consultation, and to outline how the submissions have been responded to. This report was prepared by Arup, with the responses to submissions relating to the FESLUP prepared by Coillte.

Section 2 of this report sets out the consultation requirements for the FESLUP and the associated environmental documents. Section 3 of this report provides a breakdown of the submissions received and an overview of the key issues raised. Section 4 of this report provides an overview of the submissions received from the Public Bodies and how they were responded to, while Section 5 of this report provides an overview of the submissions received from the general public (including private companies), and how they were responded to.

Appendix A of this report sets out each of the submissions received from the Public Bodies and describes how these submissions were taken into account. In the interest of the General Data Protection Regulation (GDPR), the full submissions from members of the general public (including private companies) are summarised in Section 4 only- they are not contained in Appendix A.

2. Consultation Requirements

Article 6 of the SEA Directive, as transposed into European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations (S.I. No. 435 of 2004), as amended, sets out the statutory requirements for the public to be able to participate in the SEA process.

According to Article 13(1) and (2) of S.I. No. 435 of 2004, as amended:

13. (1) A competent authority shall

(a) send notice and a copy of the draft plan or programme, or modification to a plan or programme, and associated environmental report to the Public Bodies specified in article 9(5), as appropriate, and state that a written submission or observation with respect to the draft plan or programme, or modification to a plan or programme, and associated environmental report made to the competent authority within a specified period of not less than 4 weeks from the date of the notice will be taken into consideration before the finalisation of the plan or programme, or modification to a plan or programme, and

(b) publish notice, in accordance with sub-article (2), of the preparation of the draft plan or programme, or modification to a plan or programme, and associated environmental report in at least one newspaper with a sufficiently large circulation in the area covered by the plan or programme, or modification to a plan or programme.

(2) A notice under sub-article (1)(b) shall state that—

(a) a copy of the draft plan or programme, or modification to a plan or programme, and associated environmental report may be inspected at a stated place or places and at stated times during a stated

period of not less than 4 weeks from the date of the notice (and the copy shall be kept available for inspection accordingly), and

(b) a written submission or observation with respect to the draft plan or programme, or modification to a plan or programme, and associated environmental report made to the competent authority within the period referred to in paragraph (a), or such period as may be specified in law in respect of the draft plan or programme, or modification to a plan or programme, will be taken into consideration before the finalisation of the plan or programme, or modification to a plan or programme.

In compliance with Article 13(1)(a), notice was sent to the following Statutory Consultees, inviting them to make a submission or observation on the draft FESLUP and Environmental documents: the EPA, Minister for Housing, Local Government and Heritage, Department of Environment, Climate and Communications, Department of Agriculture, Food & the Marine and Department of Agriculture, Environment and Rural Affairs.

In compliance with Article 13(1)(b) and Article 13(2), notice of the publication of the draft plan and environmental documents was published in the Irish Examiner on 14th September 2023.



COILLTE

Public Consultation

Forests for climate Forests for nature
Forests for wood Forests for people

Coillte's strategic vision for its future forest estate, launched in April 2022, aims to sustainably balance and deliver the multiple benefits from its forests for climate, nature, wood and people.

Coillte has developed a draft Forest Estate Strategic Land-Use Plan (FESLUP), which sets out Coillte's objectives to deliver on its Strategic Vision ambitions to 2050.

Coillte is inviting submissions on this draft FESLUP, including the relevant environmental assessment documentation, which supports the plan.

A copy of the draft plan, Strategic Environmental Assessment Report, Appropriate Assessment Screening and Natura Impact Statement Report may be viewed on Coillte's website at www.coillte.ie

A printed copy of Coillte's draft FESLUP and associated environmental reports are also available from **14th September – 26th October** at: Coillte Head Office, Dublin Road, Newtownmountkennedy, Co. Wicklow, A63 DN25.

Written submissions or observations on the draft plan and associated environmental reports received by Coillte during this consultation period, will be considered before the plan is finalised.

Submissions or observations can be made:

- by email to feslup_sea@coillte.ie
- in writing to: Coillte SEA 2023, Coillte Head Office, Dublin Road, Newtownmountkennedy, Co. Wicklow, A63 DN25

Submissions or observations should include your name, address and where relevant the organisation or body represented. Please make your submission in one form only i.e., post, hand delivered or email.

The closing date for submissions is 5.30pm on Thursday 26th October 2023. Please note: late submissions will not be considered.

For further information please visit www.coillte.ie

This consultation is being carried out in accordance with the requirements of S.I. No. 435 of 2004 (European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004, as amended by S.I. No. 200 of 2011 (European Communities (Environmental Assessment of Certain Plans and Programmes) (Amendment) Regulations 2011), a Strategic Environmental Assessment (SEA) is being carried out in respect of the draft FESLUP, and an SEA Environmental Report has been prepared. Further, in accordance with Article 6(3) and 6(4) of the Habitats Directive, an Appropriate Assessment is being carried out in respect of the draft FESLUP, and an 'Appropriate Assessment Screening & NIS Report' has been prepared.

Figure 2.1 Copy of the Public Advertisement Pertaining to the Public Consultation

A copy of the draft FESLUP, the SEA Environmental Report (ER) the Appropriate Assessment Screening and Natura Impact Statement Report and the AA Screening Determination were on public display for a period of six weeks, from September 14th to October 26th, 2023. The documents were made available on a designated page on the Coillte website, along with information on how to make a submission or observation: <https://www.coillte.ie/about-us/media/updates-2/>

A printed copy of Coillte's draft FESLUP and associated environmental reports were also made available for the same period, at: Coillte Head Office, Dublin Road, Newtownmountkennedy, Co. Wicklow, A63 DN25.

3. Overview of Submission Responses

A total of 20 No submissions (including 3 submissions from 1 organisation) were received as part of the consultation, as follows:

- General Public= 8 No.¹
- Companies and/or Organisations= 3 No.
- Public Bodies (Including Statutory Consultees) = 7 No.¹



Figure 3.1 Breakdown of Submissions Received

Refer to Table 2.1 and Figure 2.1 for a breakdown of the submissions received.

Table 3.1 Breakdown of Submissions Received

| Organisation |
|--|
| Department of Environment Climate and Communications (DECC) |
| General Public |
| Department of Housing, Local Government and Heritage (DHLGH) |
| Inland Fisheries Ireland (IFI) |
| Department of Agriculture, Environment and Rural Affairs of Northern Ireland (DAERA) (3 SUB-DEVISIONS) |
| Department of Agriculture, Food and the Marine (DAFM) |
| Fáilte Ireland |
| Companies and/or Organisations |
| Environmental Protection Agency (EPA) |

The key issues raised in the submissions are illustrated in Figure 2.2. below.

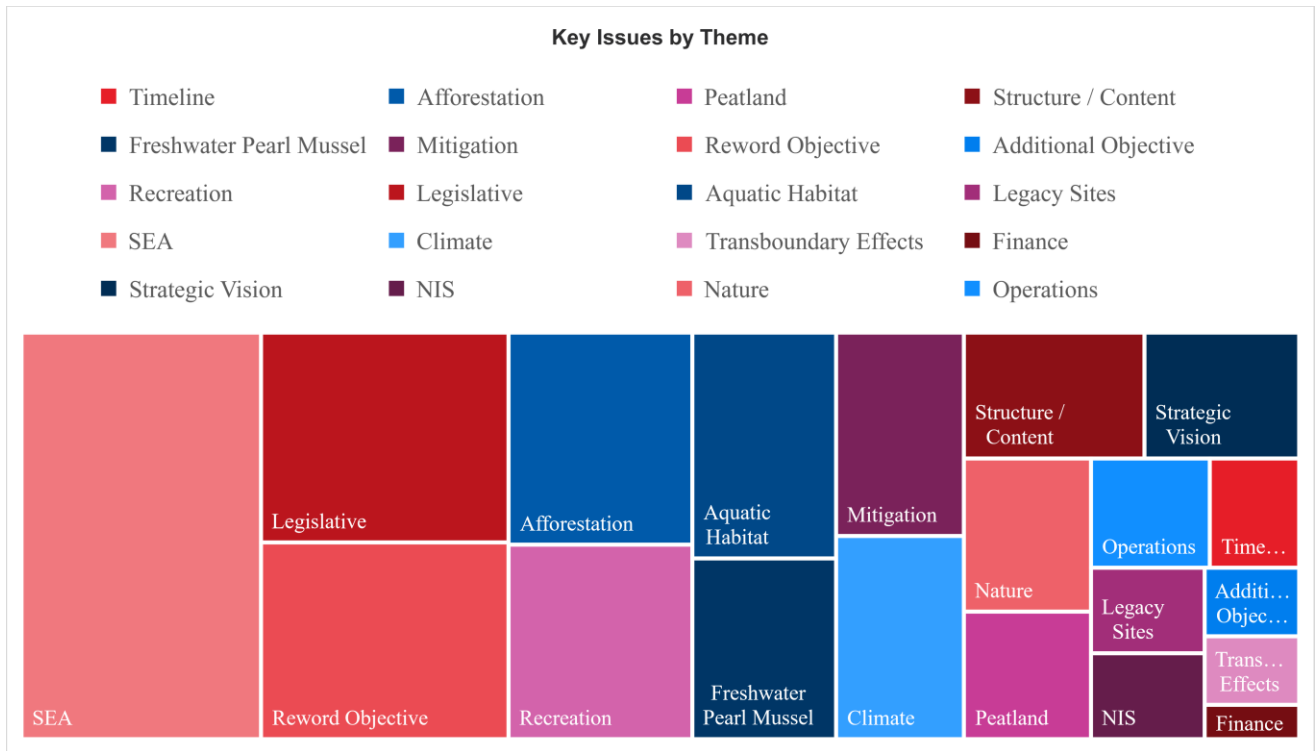


Figure 3.2 Submissions: Key Themes

4. Summary of the Public Body (Including Statutory Consultees) Submissions

The submissions received from Public Bodies (including Statutory Consultees) provided a diverse range of feedback, focusing on environmental impacts, archaeological preservation, compliance with new forestry guidelines, and the need for comprehensive and transparent monitoring and communication strategies.

Refer to Appendix A for full details of the submissions received from the Public Bodies (including Statutory Consultees) and how they were responded to.

Department of the Environment, Climate and Communications (DECC)

The DECC sought further information on the monitoring and review of the FESLUP. As discussed in the draft FESLUP, Coillte will commence, by the beginning of 2024, the preparation of a Forest Estate Strategic Implementation Plan which will drive the delivery of the FESLUP objectives for the subsequent 10-year period. The Strategic Implementation Plan will take the strategic objectives and translate these into a range of implementable, measurable, actions across specific geographical locations. The Strategic Implementation Plan will set out greater detail on the implementation timelines for the delivery of the plan objectives. Future FESLUP reviews will be aligned with reviews of the Strategic Implementation Plan and will be carried out every five years. The review and monitoring results of the plans will be made publicly available.

The Department also highlighted the need to consider the impact of the Government’s recent Forestry Programme 2023 – 2027 on Coillte’s Strategic Vision and the FESLUP, especially regarding afforestation on peat soils and habitats precluded from afforestation. Coillte is satisfied that the Forestry Programme has been duly taken into account in the preparation of the FESLUP.

The Department also sought clarity on the extent of peatland rewetting that the FESLUP will give rise to.

Coillte acknowledges the scale of the ambition relating to redesign and rewetting of peatlands and that it presents particular challenges in an area where the science and understanding is continually evolving. In this regard, Objective CO7 has been revised, as follows: “Continuously develop guidelines for the redesign of

peatlands based on best international practice and informed by suitably qualified professionals”. As such it is not possible at this stage to clarify the extent of peatland rewetting, however Coillte’s collaborative approach, along with its work on projects such as the Wild Western Peatlands, will help in the development of a range of solutions for rewetting and redesigning where appropriate.

Department of Housing, Local Government and Heritage (DHLGH)

The DHLGH requested that further reference to the Freshwater Pearl Mussel be included in the draft Plan and environmental documents. The FESLUP, SEA ER and NIS have all been updated to have greater regard to the Freshwater Pearl Mussel.

DHLGH echoed DECC’s request for further clarity surrounding the monitoring and reporting of the plan.

DHLGH raised concerns about potential communication breakdowns with contractors undertaking forestry works leading to the damage of archaeological monuments. The department also proposed conducting an archaeological survey and recognised the educational and heritage value of archaeological monuments for biodiversity and management purposes. Moreover, the Department emphasised the importance of adhering to afforestation restrictions in sensitive ecological locations.

Coillte welcomes these observations from the Department, and the concerns have been flagged to the relevant operations teams internally in Coillte.

The Department called for more ambitious targets for peatland forest redesign.

Coillte has examined its peatland soils and forest stand characteristics (such as tree species, forest age, and productivity). As part of this analysis, Coillte has identified approximately 30,000 hectares of forests across its estate that are located on deep peats, which present a carbon emission risk, that should be redesigned.

This work is already underway with the Wild Western Peatland Project with a pilot site identified at Coillte’s Derryclare forest in Connemara County Galway. The Wild Western Peatlands project will see Coillte restore and rehabilitate approximately 2,100 hectares of Atlantic blanket bog and wet heath that is currently planted with spruce and pine forests.

Coillte’s analysis has also demonstrated that, from a climate perspective, it is preferable to replant productive peatland forests to deliver sink, store and substitution benefits.

As such Coillte considers that the stated ambition to redesign 30,000 ha of peatland forests by 2050 as appropriate, however Coillte welcome the opportunity to participate in the restoration assessment of forestry on peatlands to share our learnings and as part of our Objective CO7 to ensure any redesign is based on best practice and informed by suitably qualified professionals.

DHLGH noted that the reflection on past practices is important and welcome. However, key issues relating to legacy impact on birds are omitted. The FESLUP has been updated to have regard to same.

Inland Fisheries Ireland (IFI)

IFI highlighted the potential impact of the project on non-designated surface waters and fisheries resources. While supporting best operational practices, they expressed concerns about the environmental impacts of forestry on water quality, especially at legacy sites. The FESLUP and associated environmental reports were updated to have greater regard to some of the legacy issues pertaining to water quality and fish species for example, Atlantic salmon and lamprey.

Department of Agriculture, Environment and Rural Affairs of Northern Ireland (DAERA)

The NI Department for Communities - Historic Environment Division, requested further clarification regarding transboundary baseline information and the potential environmental effects on the setting of transboundary cultural heritage assets, particularly in relation to wind energy developments.

Transboundary baseline information has been considered in the SEA and AA as deemed relevant.

NI Department for Communities - Historic Environment Division requested reference to the Convention for the Protection of the Archaeological Heritage of Europe (revised) (Valletta, 1992) in the SEA Environmental Report- which has been updated to reflect this inclusion.

DAERA welcomed the biodiversity monitoring measures but suggested including additional reports as monitoring indicators. Table 9.2 of the SEA ER has been updated to include the two DAERA reports as monitoring sources.

DAERA also requested for more information on air quality monitoring standards and expressed concern about the draft Plan's lack of reference to marine aspects in the environmental baseline and potential transboundary impacts in Northern Ireland.

The SEA Environmental report states that ‘...*monitoring of the draft FESLUP, its objectives and performance against any ambitions set out. Particularly, in developing an appropriate set of monitoring standards for environmental parameters relevant to Coillte’s estate and activities.*’ This has been updated to state ‘*monitoring of the draft FESLUP, its objectives and performance against air quality standards*’. Appendix A2 has been updated to include reference to Northern Ireland marine policy, legislation plans and programmes. The SEA monitoring table and monitoring commitments contained within the SEA ER will be reviewed as part of any future SEAs of Coillte plans.

DAERA Forest Service supported engagement with agriculture and the public sector for woodland expansion, noting that schemes alone are insufficient. They emphasised the importance of farmer-led afforestation under the Forestry Act 2010 and highlighted a lack of trained forestry practitioners. DAERA acknowledged the increase in visitors post-COVID-19 and potential for expanded recreation provisions, including cross-border projects.

The FESLUP contains objectives relating to education and training of forestry practitioners as well as objectives to support the operational contractor base to grow and diversify. The FESLUP also contains a number of objectives pertaining to expanding recreation provisions.

Department of Agriculture, Food and the Marine (DAFM)

DAFM noted their support for the FESLUP and its alignment with the new Forest Strategy for Ireland in delivering the multiple benefits of forests for Climate, Nature, Wood and People.

DAFM noted how the strategic vision will see Coillte play a leading role in the delivery of solutions to the climate emergency and biodiversity crisis, whilst also ensuring a strong supply of sustainably produced timber. DAFM noted that the FESLUP takes account of the need to manage forests for a number of objectives in a way that best delivers multiple benefits to society, and the important role that Coillte’s ambitious afforestation objectives will play in helping Ireland reach its climate targets.

DAFM noted the recent Teagasc Marginal Abatement Cost Curve (MACC) 2023 which outlines a number of potential contributions to climate change mitigation and that the Coillte estate can help deliver on some of these pathways.

Coillte note that our approach to “Forests for Climate” has been to assess the estate for its potential to sink and store carbon in the forests and soils, and the potential to substitute carbon intensive products with wood products, to deliver climate mitigation benefits over both the short and long term. In this regard our strategic ambitions and FESLUP are delivering on the MACC climate change mitigation pathways through: *Afforestation* and our ambition to enable the creation of 100,000 hectares of new forests, that will sink c.18m tonnes of CO₂, by 2050; *Optimising the age profile* and managing the existing Forest Estate to increase the carbon store by 10m tonnes of CO₂ by 2050, and; by *Redesigning* 30,000 hectares of Peatland Forests for climate and ecological benefits by 2050.

In developing our forests for climate ambitions and FESLUP objectives, it is important to note that maintaining an economically strong and sustainable wood and timber sector is essential, not only to deliver the triple “sink, store, substitute” carbon and climate benefits, but to ensure balanced delivery of the multiple benefits for nature and people. The FESLUP also recognises the need to improve existing knowledge around the relationship between the forest estate, carbon cycle and climate change. In this regard the FESLUP objectives include commitments to continue to invest in research and science to further extend our understanding of forest design and management as well as refining our understanding of how we manage carbon in forests.

DAFM welcomed the ambition in relation to “Forests for Wood” and the emphasis of the strategy on the importance of harvested wood products (HWP) and its potential to decarbonise the build economy. DAFM also noted the alignment of the FESLUP with the objectives of Ireland’s Forest Strategy in terms of

expanding the forest estate to deliver lasting climate change benefits through Harvested Wood Products and their role in decarbonising the built economy.

DAFM noted that Coillte's forestry strategic vision is in alignment with the latest Shareholder Letter of Expectation. DAFM also noted the importance of continuing to prioritise sustainable forest management and the protection of the environment within the management of the Coillte estate with the proposed creation of 100,000 ha of afforestation over the lifetime of the FESLUP.

In this regard, it is noted that the management of the forest estate, and our ambitions to enable the creation of 100,000ha forests, will be carried out using sustainable forest management and environmental practices to ensure the protection of Ireland's natural and cultural heritage.

Fáilte Ireland

Fáilte Ireland expressed support for the FESLUP's ambition to provide inclusive and high-quality recreational services, with a suggestion to review the Environmental Protection Agency's (EPA) guidance document "Good practice guidance on SEA for the Tourism Sector" for further direction.

This submission is welcomed. Arup, in undertaking the SEA had regard to the EPA guidance document 'Good practice guidance on SEA for the Forestry Sector'.

Environmental Protection Agency (EPA)

The EPA queried whether the 8,000 Hectares (Ha) per annum sectoral afforestation goal is consistent with supporting achievement of the climate neutrality goal based on EPA-funded research.

Coillte notes that the national ambition for sectoral afforestation is outside the remit of Coillte. Within the FESLUP, Coillte has outlined objectives to help deliver the Coillte Ambition of enabling 100,000 Ha of afforestation within the period of the plan.

The EPA suggested integrating the SEA ER into the FESLUP for better outcomes and compliance with forestry guidelines. A new Chapter of the FESLUP has since been prepared to reflect same, entitled 'Environmental Considerations.'

In terms of the proposed mitigation measures, the EPA suggested that there is merit in clarifying whether these relate to the existing forest estate or more reflective of the proposed expanded forestry estate. Coillte confirms that the mitigation measures relate to the entire estate- existing and future expanded estate.

The EPA echoed DECC's submission seeking further clarity surrounding Coillte's objectives to redesign peatlands at scale.

The EPA recommended establishing a governance structure for guideline implementation and creating criteria for afforestation land selection. They called for public disclosure of monitoring results and training for staff and contractors in nature conservation. The EPA also suggested reviewing recreational infrastructure, avoiding sensitive areas, updating old documents to match current regulations, and including relevant UN Sustainable Development Goals. A detailed response to the EPA's observations are set out in Appendix A.

5. Summary of Non-Statutory Submissions

Companies/Organisations

Submissions from companies/organisations, mostly from the sawmill industry, largely related to the ambitions and objectives pertaining to timber production, and the balancing of the timber and nature ambitions and objectives.

As discussed in the draft FESLUP, Coillte will commence, in 2024, the preparation of the Forest Estate Strategic Implementation Plan which will drive the delivery of the FESLUP objectives for the subsequent 10-year period. The Strategic Implementation Plan will translate strategic objectives into a range of implementable, measurable, actions across specific geographical locations. The Strategic Implementation

Plan will identify which types of locations will be subject to new forest creation. The Implementation Plan will set out further information pertaining to planting targets.

Section 3.3 of the draft FESLUP provides an overview of how Coillte approached balancing the four pillars and subsequent ‘objectives’, to ensure Coillte is meeting their high-level ambitions for Biodiversity, Climate Wood and People. The need for enhanced biodiversity management of the forest estate was evident from public consultation feedback on Coillte’s Strategic Vision, as well as from emerging policy. A range of objectives have been set out within the FESLUP on how Coillte intends to deliver on ambitions for Wood.

Submissions from private companies also identified support around Coillte’s objective to increase awareness around the benefits of using Irish timber and encouraging people to pursue a forestry career.

General Public

Submissions from the general public largely related to biodiversity and conservation concerns, including but not limited to:

- Impacts of Sitka Spruce on native peatlands, species diversification and water quality
- Need for more native tree planting
- Deer management

The ambitions of Coillte’s Strategic Vision and the Objectives of the draft FESLUP have been developed to address many of the issues raised in these submissions. Coillte is committed to the creation of 100,000 Ha of new forests, half of which will be native woodlands. It also commits to enhanced biodiversity management of the estate. Coillte has also set out an objective to “Collaborate and engage as a key partner with the ongoing preparation of the Deer Management Strategy and seek to implement once published, in so far as possible and appropriate. Coillte will continue to implement internal policy and guidance, as well as policy and guidance of DAFM, pertaining to riparian buffers.

A member of the public also made an observation pertaining to other aspects of the environment concerning forestry, as follows:

- The need to increase awareness of heritage sites in the area.
- Visibility of fire belts.
- Planting on hilltops to preserve the aesthetics/natural view of the countryside.

The ambitions of Coillte’s Strategic Vision and the Objectives of the draft FESLUP have been developed to address many of the issues raised in this submission. As discussed in the draft FESLUP, Coillte will commence, in the beginning of 2024, the preparation of the Forest Estate Strategic Implementation Plan which will drive the delivery of the FESLUP objectives for the subsequent 10-year period.

The Strategic Implementation Plan will translate strategic objectives into a range of implementable, measurable, actions across specific geographical locations. The Strategic Implementation Plan will identify which types of locations will be subject to new forest creation.

The submission pertaining to fire belts has been circulated to the relevant operations teams internally within Coillte, as it is deemed to sit outside the scope of the FESLUP. Increasing the awareness of heritage sites falls outside the scope of Coillte’s FESLUP.

A member of the general public also set out requests for further consideration of recreation facilities, including but not limited to:

- Improvement to signage for cyclists.
- The development of new mountain biking facilities
- Increase in the number of campsites.

All opportunities and solutions that respond to site-specific interventions (such as wayfinding strategies and planned recreational activities) will be identified and integrated into the additional recreational offerings, provided for under objectives PO6 and PO7.

One member of the public suggested that the SEA fails to identify and address the matter of legal legacy issues with Coillte's estate.

The SEA was carried out in full compliance with Directive 2001/42/EC and S.I No. 435 of 2004, as amended. In accordance with the relevant legislation, an assessment has been carried out of the plan provisions against the existing baseline environment as described in Section 5 of the SEA ER. Any legacy issues pertaining to forestry, which are discussed within the FESLUP are considered part of the baseline environment.

One member of the public also raised concerns about the scope of carbon assessment in the SEA, and that there is no full life-cycle carbon accounting in the SEA. The submission also stated that the negative impact on carbon of the significant programme of construction of Forest Roads has not been appropriately considered in the SEA.

There is no requirement to carry out full life-cycle carbon accounting in SEA. As discussed in the draft FESLUP, Coillte will commence, by the beginning of 2024, the preparation of the Forest Estate Strategic Implementation Plan which will drive the delivery of the FESLUP objectives for the subsequent 10-year period. The Strategic Implementation Plan will take the strategic objectives and translate these into a range of implementable, measurable, actions across specific geographical locations. The Strategic Implementation Plan will identify which location types will be subject to new forest creation and indeed the development of any new forest roads.

Coillte's compliance with EU legislation was also called into question by one member of the public. Coillte engages with DAFM and other relevant regulatory bodies to ensure that forest operations are conducted in a manner that achieves compliance with all relevant legislation.

Coillte is committed to the protection of species listed under the Habitats Directive. In accordance with the Forestry Regulations 2017, a Screening for Appropriate Assessment is required for all licensed forestry activities. Potential impacts on such species will be included in these assessments.

One member of the public queried whether the selection of mitigation measures is sufficient, considering that some of the guidance references have not been updated in some time. As outlined on page 51 of the draft FESLUP, *"...any future variations or amendments to these documents (or other new guidance/policies of relevance that may be adopted), will be reviewed and complied with, as appropriate, prior to the implementation of any of the measures or actions set out in the draft FESLUP."* Further, the mitigation measures do not only rely on published government guidance or policy documents. As noted in Appendix A of the draft FESLUP and in the SEA ER, *"Coillte has an Environmental Management System in place which contains a suite of policies and standard operating procedures which guides the environmental management of its operations, e.g., policies relating to Old Woodland and the disturbance to birds during forestry operations. In addition, Coillte implements its operational activities in accordance with its Environmental Risk Assessment standard operating procedure. This procedure applies to the assessment of the risk of environmental impact of operational activities."* Coillte is satisfied that at plan level, the mitigation measures outlined are sufficient to mitigate any impacts that are likely to arise from the implementation of the plan. Project level mitigation measures will be established and implemented, as appropriate.

A collective submission from three academic researchers on the Freshwater Pearl Mussel requested greater reference be made to same throughout the draft FESLUP and environmental documents. The submission flagged that the "Top 8" populations that still hold the vast majority of the Irish Margaritifera resource must be treated as the highest restoration emergency action of our biodiversity crisis.

Reference to the Freshwater Pearl Mussel Regulations has been included in the SEA ER and NIS, as well as Appendix A and B of the draft FESLUP. The FESLUP is in alignment with the Government's Forestry Programme 2023-2027 wherein no afforestation shall take place within the "Top 8" catchments for freshwater pearl mussel. - Further, the restoration of legacy sites is a key consideration of the Forests for Climate and Forests for Nature pillars.

Appendix A

Detailed Submissions Received from Public Bodies (Including Statutory Consultees)

| No. | Consultation feedback | Organisation/ Individual | Recommendation/ Response |
|-----|---|---|---|
| 1. | The Department welcomes the commitment to monitoring and review on an ongoing basis; and suggests that it would be helpful to indicate in the plan the timelines for such monitoring and review to take place. The Department would also welcome a commitment to publish the outcomes of such regular monitoring and review, as appropriate. | Department of the Environment, Climate and Communications | <p>As discussed in the draft FESLUP, Coillte will commence, by the beginning of 2024, the preparation of the Forest Estate Strategic Implementation Plan which will drive the delivery of the FESLUP objectives for the subsequent 10-year period. The Strategic Implementation Plan will take the strategic objectives and translate these into a range of implementable, measurable, actions across specific geographical locations.</p> <p>The Strategic Implementation Plan will set out greater detail on the implementation timelines for the delivery of the plan objectives. FESLUP reviews will be aligned with reviews of the Strategic Implementation Plan and will be carried out every five years. The review and monitoring results of the plans will be made publicly available.</p> |
| 2. | <p>The Department notes the recent publication of the Government’s Forestry Programme 2023 – 2027 and suggests that further consideration may need to be given to any impacts it may have on Coillte’s Strategic Vision and Land Use Plan as currently stated, particularly with regard to restrictions in the new Forestry Programme including (but potentially not limited to):</p> <ul style="list-style-type: none"> • Afforestation on peat soils and • Habitats precluded from afforestation including Special Protection Areas (SPAs). | Department of the Environment, Climate and Communications | Coillte is fully aware of the publication and components of Government's Forestry Programme 2023-2027. It is understood that no new afforestation on peat soils nor afforestation within SPAs shall take place (unless it is considered as part of the conservation objectives of said site). Any afforestation is in full compliance with the forestry standards manual and the environmental requirements for afforestation guidance. Included within this is the requirement to submit an AA Screening (and NIS where applicable) which is required to consider any habitats within the zone of influence of an afforestation licence. |
| 3. | The Department would welcome further clarity on the extent of peatland rewetting that this programme will give rise to. As Coillte will be aware, peatland rewetting is a key priority for the Department in providing climate mitigation and biodiversity benefits. | Department of the Environment, Climate and Communications | Redesign of peatlands will include a range of solutions including rewetting and rehabilitating where possible, and taking other options into account where this is not feasible such as, for example, establishing native and mixed woodlands. The scale of the ambition relating to redesign and rewetting of peatlands is acknowledged and presents particular challenges in an area in which science and understanding is continually evolving. In this regard revised <i>Objective CO7</i> seeks to clarify redesign by “ <i>Continuously develop guidelines for the redesign of</i> |

| | | | |
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| | | | <i>peatlands based on best international practice and informed by suitably qualified professionals</i> ". As such it is not possible at this stage to clarify the extent of peatland rewetting, however our collaborative approach, along with our work on projects such as the Wild Western Peatlands, will help us develop a range of solutions for rewetting and redesigning where appropriate |
| 4. | In regard to the SEA Environmental Report and the Natura Impact Statement, the Department is of the view that all the proposed mitigation measures should be undertaken and incorporated into the final plan document as appropriate. Full and effective implementation of these measures is required to ensure that there is not a risk of negative impacts to environmental receptors. In this regard, monitoring of the Plan as required by the SEA Directive is also important and should be considered an integral part of Plan delivery by Coillte. | Department of the Environment, Climate and Communications | The SEA ER and NIS mitigation measures were included as Appendix A and Appendix B of the draft FESLUP and will be included again in the final version of the Plan. |
| 5. | We draw particular attention to the duty that Coillte has as a relevant public body under Schedule 2 of the European Communities Environmental Objectives (Freshwater Pearl Mussel) Regulations 2009 (S.I. No. 296). The regulations and Coillte's specific responsibility within them are not mentioned in any of the consultation documents. The purpose of these Regulations is to support the achievement of favourable conservation status for freshwater pearl mussels. To that end they: <i>(a) Set environmental quality objectives for the habitats of the freshwater pearl mussel populations named in the First Schedule to these Regulations that are within the boundaries of a site notified in a candidate list of European sites, or designated as a Special Area of Conservation, under the European Communities (Natural Habitats) Regulations, 1997 (S.I. No. 94/1997).</i> <i>(b) Require the production of sub-basin management plans with programmes of measures to achieve these objectives.</i> <i>(c) Set out the duties of public authorities in respect of the sub-basin management plans and programmes of measures.</i> | Dr Evelyn A. Moorkens, Ian J. Killeen, Dr Eugene Ross | It is noted that the SEA ER and NIS refers to the embedded mitigation measures within the forestry licensing system, which includes the Forestry & Freshwater Pearl Mussel Requirements: Site Assessment and Mitigation Measures Forest Service (2000) Department of the Marine and Natural Resources, Draft Plan for Forests & Freshwater Pearl Mussel in Ireland Requirements (2021). Reference to the Freshwater Pearl Mussel Regulations has been included in the SEA and AA, as well as Appendix A and B of the FESLUP. |
| 6. | Archaeology: Where contractors are used in the carrying out of forestry activities, there is potential for a breakdown in communication regarding the details of plans compiled in accordance with ERA procedures, perhaps resulting in damage to archaeological | Department of Housing, Local Government and Heritage | This submission is noted and has been circulated to the relevant teams within Coillte, as it falls outside the strategic scope of the FESLUP. |

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| | <p>monuments on the Coillte Forest Estate. It will be very important, that the objectives and actions in FESLUP take account of this potential problem and address it strongly, both in objectives and in the terms of contracts for work presented to contractors and their sub-contractors.</p> | | |
| 7. | <p>Implementation of the objectives listed below, addressing ERA procedures and the role of contractors and staff, should be directed towards ensuring archaeological monuments, as well as other receptors, are not endangered.</p> <p>Some re-wording of the following objectives should be considered, to ensure that contractors and sub-contractors are obliged to be fully aware of and to adhere to ERA plans:</p> <ol style="list-style-type: none"> 1. Objective NO9: Review and update, as appropriate, Environmental Risk Assessment (ERA) standards and procedures to inform planning and operations, in line with ongoing and emerging best practice. 2. Objective WO6: Ensure that access to the Forest Estate for the purpose of roundwood removals is maintained through Forest Industry Transport Group collaboration with the partners and stakeholders. 3. Objective PO11: Support the operational contractor base to grow and diversify, so that it has the capacity to deliver Coillte’s afforestation, peatland redesign and nature ambitions. 4. Objective PO12: Enhance operational guidance for staff and contractors regarding biodiversity management and peatland redesign. | <p>Department of Housing, Local Government and Heritage</p> | <p>This submission is noted and has been circulated to the relevant teams within Coillte, as it falls outside the strategic scope of the FESLUP.</p> <p>Objective NO9 of the FESLUP sets out Coillte’s objective to “<i>Review and update, as appropriate, Environmental Risk Assessment (ERA) standards and procedures to inform planning and operations, in line with ongoing and emerging best practice.</i>”</p> <p>The Operations Team in Coillte will consider addressing measures relating to archaeological protection in the update of the ERA standards and procedures.</p> |
| 8. | <p>Ambitions 9 & 10:</p> <p>In previous correspondence relating to FESLUP, this Service noted that there are many archaeological monuments on the Coillte Estate, some of which are of national importance and are subject to a high degree of legislative protection. It was suggested that it would be a very positive outcome from the current process, if an archaeological survey were carried out on the Coillte Estate and an inventory produced, which listed monument the type, condition and level of statutory protection (under National Monuments legislation), of all archaeological monuments on the Estate.</p> | <p>Department of Housing, Local Government and Heritage</p> | <p>As discussed in the draft FESLUP, Coillte will commence, by the beginning of 2024, the preparation of the Forest Estate Strategic Implementation Plan which will drive the delivery of the FESLUP objectives for the subsequent 10-year period. The Strategic Implementation Plan will take the strategic objectives and translate these into a range of implementable, measurable, actions across specific geographical locations. The Strategic Implementation Plan will identify which locations will be subject to new forest creation or any the implementation of any of the plan objectives.</p> <p>This submission has been noted by Coillte and will be considered as part of the development of the Strategic Implementation Plan.</p> |

As educational and heritage tourism resources, archaeological monuments on the Coillte Estate will contribute to ambitions 9 and 10, which aim to support tourism, recreation, wellbeing and local communities. This Service encourages public access to and interaction with archaeological monuments and will advise Coillte as to how this might be achieved, without damage to the monuments and subject to relevant notification under the terms of section 12(3) of the national Monuments (Amendment) Act, 1994.

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| <p>9.</p> | <p>Ambitions 5 & 6: It is also useful to note, in the context of FESLUP being in compliance with the rules of the Common Agricultural Policy and the National CAP Strategic Plan, that in 2015, protected archaeological sites were designated by DAFM as Landscape Features under the Good Agricultural and Environmental Condition aspect of Cross Compliance. Their landscape value has therefore been recognized in that context. Two archaeological actions included in the ACRES agri-environment scheme currently available to farmers under the CAP, recognize and capitalize on the obvious biodiversity value of many archaeological monuments. These actions enable farmers in ACRES to manage archaeological monuments in accordance with the rules of the scheme, in ways that enhance their biodiversity and habitats value, bringing positive outcomes for the monuments and for farmers. There is therefore at least one precedent for the recognition of the biodiversity and habitats value of archaeological monuments which might inform how they can contribute to the biodiversity and management for nature aims of ambitions 5 and 6.</p> | <p>Department of Housing, Local Government and Heritage</p> | <p>This submission is noted. The SEA has been updated to reflect the DAFM designation of archaeological sites as Landscape Features and the subsequent biodiversity and habitat potential of same.</p> |
| <p>10.</p> | <p>Nature Conversation: The Department would like to remind Coillte of the strict restrictions on afforestation, within sensitive ecological locations, as outlined in Irelands Forest Strategy - Implementation Plan, (DAFM 20231). This forest strategy provides for strict restrictions on afforestation within Annex I habitats, in areas sensitive to certain bird species and within sensitive catchment locations. The FESLUP should be cognisance of this national</p> | <p>Department of Housing, Local Government and Heritage</p> | <p>Coillte is fully aware of the publication and components of Government's Forestry Programme 2023-2027 and are fully compliant with the restrictions in place for afforestation in particular within sensitive ecological locations. Coillte is subject to the Forestry Regulations (2017) and as such are in full compliance with the legal framework set out for the forestry sector</p> |

strategy and ensure its objectives can meet these nationally-set biodiversity protection measures for forestry. It will be imperative that the appropriate scientific/ecological advice is available to ensure these sensitive habitats and species are identified early in any deforestation or afforestation project. Public Authorities must also ensure that when planning or undertaking any of their own works that they are fully compliant with legislation for the protection of certain habitats and species, including the strict protection for all species listed under Annex IV of the Habitats Directive; relevant legislation include the Wildlife Act, 1976 and the European Communities (Birds and Natural Habitats) Regulations, 2011.

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| 11. | 1. p5 “Coillte will prepare the first Forest Estate Strategic Implementation Plan (<i>‘the Implementation Plan’</i>) which will drive the delivery of this FESLUP over the shorter term (2026-2035)”. The Department would welcome a more detailed timeline for the delivery of the FESLUP by the Implementation Plan. | Department of Housing, Local Government and Heritage | As discussed in the draft FESLUP, Coillte will commence, by the beginning of 2024, the preparation of the Forest Estate Strategic Implementation Plan which will drive the delivery of the FESLUP objectives for the subsequent 10-year period. The Strategic Implementation Plan will take the strategic objectives and translate these into a range of implementable, measurable, actions across specific geographical locations. The Strategic Implementation Plan is expected to be published in 2025. The Strategic Implementation Plan will set out greater detail on the implementation timelines for the delivery of the plan objectives. FESLUP reviews will be aligned with reviews of the Strategic Implementation Plan and will be carried out every five years. The review and monitoring results of the plans will be made publicly available. |
| 12. | 2. Figure 2 (p.10), showing Coillte’s forest estate, is not legible. It should be enlarged to a full page map. | Department of Housing, Local Government and Heritage | Figure 2 has been enlarged; however it should be noted that figure 2, albeit accurately locating the forest estate, is for contextual representation of the estate rather than definitive mapping purposes. |
| 13. | 3. Section 2.2 “ <i>Historical context</i> ”, final paragraph (p. 14) “ <i>With the passing of decades, the character of Ireland’s forests is changing. As the modern plantation forests become more naturalised in the landscape, they are maturing from blocks of young, even-aged conifer stands to more diverse stands with a mixture of tree species and a more diverse stand structure. Consequently, the value of plantation forests, as they mature and improve for</i> | Department of Housing, Local Government and Heritage | This submission is noted. The word ‘naturalised’ has been changed to ‘established’. Coillte is committed to improving the structural diversity of the forest estate. Objective NO4 of the FESLUP sets out Coilltes objective to “ <i>Continue to increase the implementation of alternative silvicultural systems including continuous cover forestry (CCF) in forests of ecological value.</i> ” |

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| | <p><i>timber production, will also become more valuable for biodiversity and recreation</i>". The Department questions the accuracy of this paragraph. Continuous cover Forestry is not fully integrated into current practice. Regardless of future plans, at present the dominant model of forestry remains the clear-felling of even-aged monospecific stands of non-native conifers with poor structural diversity. The Department would specifically request Coillte to provide evidence to support the use of the word "<i>naturalised</i>" and the statement "<i>the value of plantation forests, as they mature and improve for timber production, will also become more valuable for biodiversity</i>".</p> | | Coillte is happy to engage and discuss with DHLGH any queries they have. |
| 14. | <p>4. It is estimated that approximately 174,000 ha (40%) of the Coillte estate is on deep peats, of which 137,000 ha is forested. An ambition to redesign 30,000 of peatland forests for climate and ecological benefits by 2050 is stated. This target should be more ambitious. It is likely that the potential to restore open blanket bog alone (targeting deep peat and flat areas i.e. areas with good potential for restoration) within the Coillte estate (including undesignated blanket bog sites) is higher than the target of 30,000 ha. The Department is commissioning a project which will include a restoration planning assessment of forestry on peat within and adjacent to blanket bog SACs/NHAs. Representation of Coillte Nature and Coillte Forest on the Steering Group for this project would be welcome.</p> | Department of Housing, Local Government and Heritage | <p>Coillte has examined its peatland soils and forest stand characteristics (such as tree species, forest age, and productivity). As part of this analysis, Coillte has identified approximately 30,000 hectares of forests across its estate that are located on deep peats, which present a carbon emission risk, that should be redesigned.</p> <p>This work is already underway with the Wild Western Peatland Project with a pilot site identified at Coillte's Derryclare forest in Connemara County Galway. The Wild Western Peatlands project will see Coillte restore and rehabilitate approximately 2,100 hectares of Atlantic blanket bog and wet heath that is currently planted with spruce and pine forests.</p> <p>Our analysis has also demonstrated that, from a climate perspective, it is preferable to replant productive peatland forests to deliver sink, store and substitution benefits.</p> <p>As such Coillte considers our stated ambition to redesign 30,000 ha of peatland forests by 2050 as appropriate, however Coillte welcome the opportunity to participate in the restoration assessment of forestry on peatlands to share our learnings and as part of our Objective CO7 to ensure any redesign is based on best practice and informed by suitably qualified professionals.</p> |
| 15. | Where the Department recommends amendments to the proposed text in the FESLUP, these are shown in red below: | Department of Housing, Local | The FESLUP has been updated to reflect the water dependent species and their associated habitats. |

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| | 5. p17 <i>“Forests for Nature” “Part of our intention, in developing the FESLUP, is to step up engagement with a view to improving the management of sensitive catchment locations on the estate and specifically within the top 8 freshwater pearl mussel catchments”</i> . This should explicitly list the water-dependant species e.g. freshwater pearl mussels and habitats e.g. oligotrophic lakes that are included in the mapped biodiversity areas. | Government and Heritage | |
| 16. | 6. p17 <i>“We are committed to continuing this work, and we are also exploring wider options for managing peatland forests for the benefit of both climate and nature”</i> . It is recommended that water-dependant species and habitats such as freshwater pearl mussel and habitats listed in Annex I of the EU Habitats Directive were amongst others were included in this statement. | Department of Housing, Local Government and Heritage | The FESLUP has been updated to reflect the water dependent species and their associated habitats. |
| 17. | 7. p17 <i>“The Coillte estate spans most of Ireland’s sub catchments and is criss-crossed by many watercourses of all sizes. The standard approach to protecting watercourses is to create a strip of vegetated ground along the watercourse by removing trees and not replanting but allowing the ground to revegetate naturally. Over time, heath, grassland and scrub vegetation develops, providing dappled shade along streams and creating corridors of natural habitat through the forests.”</i> It is essential that these riparian buffer zones are intact and effective. They should not be bisected by drains or other preferential flow pathways through the buffer zones, reducing their function in intercepting pollutants arising from and within the forest and reaching sensitive receptors e.g. rivers and freshwater pearl mussel. | Department of Housing, Local Government and Heritage | This submission is noted and agreeable. |
| 18. | 8. p18 <i>“A wealth of rare and threatened species occur across the Coillte estate, many of which are recorded on the Irish Red Lists, the Birds of Conservation Concern in Ireland and on the Habitats and Birds Directives. Coillte interacts with statutory bodies and knowledge-holders regarding the protection of the many protected species relevant to the estate. There are ongoing efforts by</i> | Department of Housing, Local Government and Heritage | This submission is noted. The FESLUP has been updated to include the points that relate to sensitive catchment areas for freshwater pearl mussel and cross reference to the Government’s Forest Strategy Implementation Plan. |

Coillte and our partners to better understand the requirements of protected bird species, such as hen harrier and merlin, and to develop targeted plans for their protection.” This paragraph should be expanded to include reference to sensitive catchment areas for freshwater pearl mussel and the need to consider specific and target measures aimed at the protection and restoration of water quality and hydrological function within these catchment areas. There should be cross reference to Ireland’s Forestry Strategy Implementation Plan - Section 1.6 (bullet point 6) which states “Freshwater Pearl Mussel: For the full duration of the Forestry Programme 2023-2027, no afforestation shall occur within the top 8 freshwater pearl mussel catchments. In addition, DAFM commits to reducing overall forest cover, in particular conifer forest cover in the top 8 catchments; In addition, DAFM commits to reducing overall forest cover, in particular conifer forest cover in the top 8 catchments; Coillte should be applying the same approach and this may require emphasis in the current document.

Coillte is fully aware of Government’s Forest Strategy Implementation Plan 2023-2027 and are in alignment with measures surrounding no afforestation within the top 8 FWPM catchments.

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| <p>19.</p> | <p>9. p24 “Forests for climate”. The Department suggests that the ambition to create 100,000 ha of new forests requires further examination in terms of identifying where in Ireland these areas have been made available and which locations will be established as native woodland.</p> | <p>Department of Housing, Local Government and Heritage</p> | <p>As discussed, in the draft FESLUP, Coillte will commence, by the beginning of 2024, the preparation of the Forest Estate Strategic Implementation Plan which will drive the delivery of the FESLUP objectives for the subsequent 10-year period. The Strategic Implementation Plan will take the strategic objectives and translate these into a range of implementable, measurable, actions across specific geographical locations. The Implementation Plan will identify which types of locations will be subject to new forest creation.</p> |
| <p>20.</p> | <p>10. p24 “Forests for nature” The Department suggests that an additional ambition be included to allow the potential for forests (or non-forested land) to provide ex-situ benefits in achieving of site-specific conservation objectives for water-dependant species and habitats.</p> | <p>Department of Housing, Local Government and Heritage</p> | <p>Coillte recognises the importance of achieving the site-specific conservation objectives for water-dependant habitats and species.</p> <p>As outlined in Section 2.4.2 of the FESLUP, “Coillte forests [are] situated in particularly sensitive locations with respect to water quality are mapped as biodiversity areas. Part of our intention, in developing the FESLUP, is to step up engagement with a view to improving the management of sensitive catchment locations on the estate.”</p> |

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| | | | <p>In addition, objective NO16 sets out Coillte’s objective to “<i>Engage with relevant agencies and stakeholders to explore how Coillte can play a role in delivering programmes and measures aimed at enhancing water quality in catchments.</i>”</p> <p>Objective NO14 sets out Coillte’s Objective to “<i>Engage with the relevant regulatory agencies on the measures required to move statutory designated sites to favourable conservation status.</i>”</p> <p>Inherent in this objective, and indeed the many objectives surrounding biodiversity management, is Coillte’s commitment to the protection and conservation of water-dependant habitats and species.</p> |
| 21. | 11. p28 Section 3.6 “ <i>Responding to Legacy Environmental Challenges</i> ”. This reflection on past practices is important and welcome. However, key issues relating to legacy impact on birds are omitted. | Department of Housing, Local Government and Heritage | The legacy issues section of the FESLUP will be updated to include discussion on legacy issues on birds. |
| 22. | 12. p28 ” <i>Water quality: Forests can and should have a positive impact on water quality. However, forest operations can put pressure on water catchments and need to be carefully managed. Degradation of water quality and aquatic ecosystems from forest-based sources of sediments and nutrients, and arising from changes in hydrological patterns. This FESLUP introduces a range of objectives and measures which will seek to offset any potential negative effects on water quality.</i> ” The initial statement that forests can and should have positive impacts on water quality is too general, since these benefits are site-specific and cumulative impacts from other land uses (including private forest) on a given water body need to be also to be taken into consideration. It is positive to see reference to “ <i>changes in hydrological patterns</i> ”- however, the potential negative effects of the FESLUP on hydrology should be included as an objective with appropriate measures introduced. | Department of Housing, Local Government and Heritage | <p>This submission is noted.</p> <p>As outlined in the FESLUP, “<i>Coillte forests situated in particularly sensitive locations with respect to water quality are mapped as biodiversity areas. Part of our intention, in developing the FESLUP, is to step up engagement with a view to improving the management of sensitive catchment locations on the estate.</i>”</p> <p>Objective NO16 of the FESLUP further relates to water quality and Coilltes commitments to improving water quality: “<i>Engage with relevant agencies and stakeholders to explore how Coillte can play a role in delivering programmes and measures aimed at enhancing water quality in catchments</i>”</p> |
| 23. | 13. p29 “ <i>Freshwater Pearl Mussel: Forestry on upland peatlands is a key pressure across the 27 catchments where the keystone species, freshwater pearl mussel is found. This FESLUP introduces a range of objectives</i> | Department of Housing, Local Government and Heritage | Coillte recognizes the importance of Freshwater Pearl Mussel conservation and will continue to operate in compliance with the Freshwater Pearl Mussel |

and measures aimed at offsetting potential negative effects on species of conservation importance”. It is recommended that this paragraph is expanded to include a statement on the need to consider specific and target measures aimed at the protection and restoration of water quality and hydrological function within the freshwater pearl mussel catchment areas. It is not clear what is meant by “a range of objectives and measures aimed at offsetting potential negative effects on species of conservation importance” for freshwater pearl mussels”. Reference should also be made to the Forestry Strategy Implementation Plan - Section 1.6 (bullet point 6) as stated in our comment No. 8. In addition, it is noted that the Department for Agriculture, Food and the Marine (DAFM) has committed to reducing overall forest cover, in particular conifer forest cover in the top 8 pearl mussel catchments. It is suggest that Coillte should be applying the same approach.

Regulations, as amended, and in alignment with the relevant guidance and policy guidelines.

As outlined in Section 2.4.2 of the FESLUP, “Coillte forests [are] situated in particularly sensitive locations with respect to water quality are mapped as biodiversity areas. Part of our intention, in developing the FESLUP, is to step up engagement with a view to improving the management of sensitive catchment locations on the estate.”

In addition, objective NO16 sets out Coillte’s objective to “Engage with relevant agencies and stakeholders to explore how Coillte can play a role in delivering programmes and measures aimed at enhancing water quality in catchments.” Objective NO14 sets out Coillte’s Objective to “Engage with the relevant regulatory agencies on the measures required to move statutory designated sites to favourable conservation status.”

Inherent in this objective, and indeed the many objectives surrounding biodiversity management, is Coillte’s commitment to the protection and conservation of the Freshwater Pearl Mussel.

Coillte is fully aware of Government’s Forest Strategy Implementation Plan 2023-2027 and are in alignment with measures surrounding no afforestation within the top 8 FWPM catchments.

24. 14. p31 “Table 1: List of key policy and legislation considerations that will inform the FESLUP”. The current adopted National Biodiversity Action Plan 2017-2021 has been reviewed and updated and it is expected that the 4th Plan will be formally adopted by the end of 2023. Table 1 should be updated to include the National Biodiversity Action Plan 2017-2021 (including any future iterations).

Department of Housing, Local Government and Heritage

This submission is noted. Table 1 has been updated to reflect

25. 15. p35 C06 “Synthesise existing information to identify potential location(s) for the redesign of peatlands at scale.” Coillte is requested to consider if some of this redesign should be targeted at pearl mussel catchments as well as catchments where other water-dependent receptors are impacted by forestry.

Department of Housing, Local Government and Heritage

This submission is noted. As discussed, in the draft FESLUP, Coillte will commence, by the beginning of 2024, the preparation of the Forest Estate Strategic Implementation Plan which will drive the delivery of the FESLUP objectives for the subsequent 10-year period. The Strategic Implementation Plan will take the strategic objectives and translate these into a range of implementable, measurable, actions across specific geographical locations. The Implementation Plan will identify which locations will be subject to peatland redesign and will take into consideration if some of this redesign should be

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| | | | targeted at pearl mussel catchments as well as catchments where other water-dependent receptors are impacted by forestry. |
| 26. | 16. p38 N01: “Classify additional biodiversity areas on the estate, focusing on habitats of the best ecological quality, and/or which have the best habitat restoration potential”. This objective should be expanded to include areas where forestry is contributing to the State not achieving favourable conservation status of water-dependant species and habitats and/or other qualifying interests impacted by forestry. This objective should also aim to include restoring habitats that support ex-situ targets e.g. restoring forests to peatlands to support water dependant habitats | Department of Housing, Local Government and Heritage | Objective NO14 of the FESLUP sets out Coillte’s objective to “Engage with the relevant regulatory agencies on the measures required to move statutory designated sites to favourable conservation status.” |
| 27. | 17. p38 N03 “Create a framework for the selection, appropriate restoration and conservation of ancient and long-established woodland, and engage with key regulatory bodies to promote the approach” is welcome. This approach should be co-created with the NPWS and other stakeholders rather than promoted to them. The objective should also be duplicated with reference to non-forest or woodland habitats within the Coillte Estate. | Department of Housing, Local Government and Heritage | As forest owner and manager, Coillte believes it is appropriate that nature conservation of forest habitats has core relevance. Scientific evidence points to the fact that the history of forest cover has an important bearing on the ecological value of modern forests. This is reflected in the fact that appropriate management of forests with a history of forest cover is a requirement of forest certification standards (FSC and PEFC). The certification requirements are that sites with a history of forest cover are “mapped and managed in a manner that retains and/or enhances their semi-natural and old woodland characteristics where such characteristics exist on site”. Key regulatory bodies will be engaged. N01 makes specific reference to ‘habitats of the best ecological quality’. |
| 28. | 18. P38 N04: “Continue to increase the implementation of alternative silvicultural systems including continuous cover forestry (CCF) in forests of ecological value.” The suitability of this model needs to be assessed for sensitive locations where infrastructure necessary to manage the forest is absent and the impact on the hydrology of the forest that may arise from construction works. | Department of Housing, Local Government and Heritage | Any new CCF sites will be subject to site suitability assessment in advance of implementation. Further, infrastructure necessary to manage such sites will be subject the environmental assessment, as required. |
| 29. | 19. p39 N09: “Monitor, review and update, as appropriate, Environmental Risk Assessment (ERA) standards and procedures to inform planning and operations, in line with ongoing and emerging best practice.” It is suggested that the efficacy of the ERA standard and | Department of Housing, Local Government and Heritage | This submission is noted and has been flagged with the relevant Coillte teams. |

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| | procedures should be scrutinised before committing to this objective. | | |
| 30. | 20. p39 N014 “Engage with the relevant regulatory agencies on the measures required to move statutory designated sites to favourable conservation status” is very welcome and additional clarification as to how such engagement may be assured would be recommended. | Department of Housing, Local Government and Heritage | Coillte is committed to ongoing engagement on both a formal and informal level with the relevant regulatory agencies and would be happy to discuss various approaches to same. |
| 31. | 21. Additional Objectives should include: a. <i>NOX: Manage or restore habitats on the estate that will assist in the restoration of ex-situ habitats, e.g. management of peatlands to support water dependant habitats.</i> b. <i>NOX: Ensure adequate measures are in place for all forest operations so they are fully compliant with the EU Birds and Habitats Directives, the European Communities (Birds and Natural Habitats Regulations, 2011 (as amended)) and the Wildlife Act, 1976 (as amended).</i> | Department of Housing, Local Government and Heritage | Coillte believes the proposed additional objectives have already been provided for with the FESLUP. With regards the first proposed additional objective, Objective NO1: “ <i>Classify additional biodiversity areas on the estate, focusing on habitats of the best ecological quality, and/or which have the best habitat restoration potential</i> ” is intended to cover all habitats, including ex-situ habitats. With regards the second proposed additional objective, Coillte believe the FESLUP, in its entirety, as well as the SEA and NIS, reflects Coillte’s commitment to comply all relevant legislation- including the EU Birds and Habitats Directives, the European Communities (Birds and Natural Habitats Regulations, 2011 (as amended)) and the Wildlife Act, 1976 (as amended). |
| 32. | 22. W01: Implications of this objective to the wider environment needs to be considered (i.e. outside of designated sites and addressing wider obligations under the Birds Directive and strict protection of species listed under Annex IV under the Habitats Directive). Recommended update to W01: “ <i>Maintain production capacity to harvest and supply certified roundwood to support timber production in full consideration of protection of the environment and Appropriate Assessment screening where necessary.</i> ” | Department of Housing, Local Government and Heritage | This submission is noted and agreeable. Coillte believe the FESLUP, in its entirety, as well as the SEA and NIS, reflects Coillte’s commitment to comply all relevant legislation- including the EU Birds and Habitats Directives, the European Communities (Birds and Natural Habitats Regulations, 2011 (as amended)) and the Wildlife Act, 1976 (as amended). |
| 33. | 23. Section 4.2.4 “ <i>Forests for People</i> ” – The Department perceives similar capacity shortages in terms of labour and skills for nature conservation, which will limit capacity to scale up nature restoration. | Department of Housing, Local Government and Heritage | This is understood by Coillte and reflected in Objective PO11, PO13 and P014 “ <i>Support the operational contractor base to grow and diversify, so that it has the capacity to deliver Coillte’s afforestation, peatland redesign and nature ambitions.</i> ” “ <i>Support the provision of education and training to attract new entrants to the sector and enhance skills in new and emerging areas</i> ”, and “ <i>Support the</i> |

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| | | | <i>enhancement of the curriculum in tertiary education and the development of apprentices to attract new forestry and related professionals to the sector”</i> |
| 34. | 24. p44 P04 “Monitor visitor numbers and measure impact, to protect the environment and enhance customer experience”. It is important to avoid placing excessive pressure on ecologically important sites. A small number of sites may benefit from minimal disturbance e.g. possible Old Growth Forest sites as recently defined by the European Commission https://environment.ec.europa.eu/publications/guidelines-defining-mapping-monitoring-andstrictly-protecting-eu-primary-and-old-growth-forests_en . | Department of Housing, Local Government and Heritage | This is noted and the objective is not intended to relate only to ecologically important sites. |
| 35. | 25. p48 Section 5.3 – “Monitoring and Review”. The Department recommends including a commitment in this section that any reporting structures to oversee, guide and track the implementation and success of the FESLUP should include a commitment to publish any such reports and to make them publicly available. | Department of Housing, Local Government and Heritage | As discussed in the draft FESLUP, Coillte will commence, by the beginning of 2024, the preparation of the Forest Estate Strategic Implementation Plan which will drive the delivery of the FESLUP objectives for the subsequent 10-year period. The Strategic Implementation Plan will take the strategic objectives and translate these into a range of implementable, measurable, actions across specific geographical locations. The Implementation Plan will set out greater detail on the implementation timelines for the delivery of the plan objectives. The FESLUP reviews will be aligned with reviews of the Implementation Plan and will be carried out every five years. The review and monitoring results of the plans will be made publicly available. |
| 36. | 26. Appendix A “SEA Mitigation Measures”, paragraph 3 (p. 51) “...where increased afforestation is facilitated negative impacts may be particularly likely for Land & Soils and Water” – Negative impacts are also particularly likely for Biodiversity and this sentence needs to be amended accordingly. | Department of Housing, Local Government and Heritage | This sentence has been updated accordingly |
| 37. | 27. Several of the mitigation documents referred to date from 2000 e.g. Forestry & Freshwater Pearl Mussel Requirements: Site Assessment and Mitigation Measures Forest Service, Forestry & Freshwater Pearl Mussel Requirements: Site Assessment and Mitigation Measures Forest Service, Forestry Biodiversity Guidelines. Forest Service (2000) Department of the Marine and Natural | Department of Housing, Local Government and Heritage | This update sits outside the gift for Coillte to implement, however Coillte is committed to fully engaging with DAFM on the need to update these guidance documents. |

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| | Resource. It is recommended that a commitment is made to update these guidance documents. | | |
| 38. | 28. p52 It is noted that there is reference to the <i>Draft Plan for Forests & Freshwater Pearl Mussel in Ireland Requirements</i> . The reference to the Draft Plan requires reconsideration, since this Plan has not been finalised nor adopted by DAFM. It is questionable therefore, whether it should be relied upon as part of the mitigation for forests and freshwater pearl mussels. | Department of Housing, Local Government and Heritage | This submission is noted however it is considered prudent to include the draft guidelines in the list of mitigation. |
| 39. | 29. p52 It is recommended that the following guidance document in relation to Annex IV species is referenced: National Parks and Wildlife Service - Guidance Series 2, 2021, Strict Protection of Animal Species – Guidance for Public Authorities on the Application of Articles 12 and 16 of the EU Habitats Directive to development/works undertaken by or on behalf of a Public Authority. | Department of Housing, Local Government and Heritage | Noted. Reference has been added. |
| 40. | SEA Environmental Report 30. p18 The infographic should be updated to include a reference to the National Biodiversity Action Plan 2017-2021 (including any future iterations). | Department of Housing, Local Government and Heritage | Noted. The infographic in Section 3.2 of the SEA ER has been updated to include the mentioned Plan. |
| 41. | 31. p21 <i>EU Forest Strategy for 2030</i> : Forestry operations have the potential to impact on wild birds and specifically during their period of breeding and rearing. Article 5 of the Bird Directive 2009/147/EC requires member states to take requisite measures to establish a system of strict protection for all bird species and to prohibit the deliberate disturbance of birds particularly during the period of breeding and rearing. This commitment is reiterated in the EU Forestry Strategy for 2030 and the FESLUP should be revised to ensure any actions arising from the implementation of this strategy are compliant with the Birds Directive. The Department recommend including an additional point in relation to commitments under the EU Forest Strategy 2030: Carrying out logging during bird-nesting period must comply with the Birds Directive (New EU Forest | Department of Housing, Local Government and Heritage | Coillte engages with DAFM and other relevant regulatory bodies to ensure that forest operations are conducted in a manner that achieves compliance with the Directive. |

Strategy for 2030, 12.07.2021; page 12, paragraph 3.) To further emphasise the importance of compliance with the Birds Directive an additional Nature Objective under ‘Forests for Nature’ has been recommended (see comment No. 21).

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| 42. | <p>32. p129 Table 9.1- <i>Proposed Mitigation Measures</i> and Page 53 of the Draft FESLUP.</p> <p>a. Aspect= <i>General</i>: It is stated that all plans and projects arising from the draft FESLUP will be subject to appropriate feasibility, options and environmental assessments (e.g., Environmental Impact Assessment, AA where required). However, where projects are deemed to not require EIA, it would be important that potential impacts to protected species and habitats are nevertheless identified and addressed by appropriate ecological expertise. Recommended update: <i>“Any new Projects or Plans arising from the implementation of the draft FESLUP shall be subject to appropriate feasibility, options and environmental assessments (e.g., Environmental Impact Assessment, AA where required). Where projects screen out for EIA potential impacts to biodiversity will be informed by appropriate scientific/ecological advice”</i>.</p> <p>b. Aspect = Biodiversity (BIO): The Department recommend caution when relying on such documents as mitigation measure where the science and knowledge has advanced since their publication. It is recommended that Coillte should also include an additional requirement to ensure any mitigation measures consider best available scientific advice. Recommended update: <i>“Any new Projects or Plans arising from the implementation of draft FESLUP shall adhere to the following guidance/ policies and</i></p> | <p>Department of Housing, Local Government and Heritage</p> | <p>This submission is noted and agreeable. The relevant updates have been made to the environmental documents and indeed to Appendix A and B of the FESLUP.</p> |
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to best available scientific advice that are of specific relevance to BIO:

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| 43. | 33. It is important to highlight that there are many surface waters, which are not formally designated but which support populations of Annex II species designated under the Habitats Directive. Projects such as proposed have the potential to impact on downstream fisheries resources if they are not carried out in an environmentally sensitive manner. When any work is carried out in close proximity to a watercourse, there is a potential for negative impacts on aquatic habitat. | Inland Fisheries Ireland | Noted. The connectivity of watercourses is captured within the NIS and SEA ER of the FESLUP and the potential for pathways for effect through hydrological means is accounted for. |
| 44. | 34. It is advocated that such plans prioritise maintenance and restoration of surface waters, in particular high quality Q5 sites which have been flagged as a significant pressure on water quality in Ireland (EPA report Water Quality in Ireland 2013-2018). | Inland Fisheries Ireland | Noted. |
| 45. | 35. Much of the forestry in Ireland is located in the headwaters of our river systems. Although these streams may not be recognised as fish or macroinvertebrate habitat through the relevant directives (WFD / HD etc.), their importance to the fisheries resource cannot be overstated. Best operational practice through strict adherence to the relevant updated guidelines should ensure compliance with fisheries requirements in the majority of cases. However, the requirement to leave riparian (Aquatic Buffer) zones entirely unplanted has resulted in a missed opportunity to improve climate resilience and ecosystem enhancement in some instances. Recent research by IFI has indicated that unshaded watercourses can be vulnerable to excessive water temperatures during drought conditions. The establishment of riparian, native broadleaf trees at low planting densities can provide essential shading for watercourses, mitigating against high summer temperatures while providing essential organic material (in the form of leaf litter) to facilitate healthy primary production in the stream environment. Any riparian planting cannot be considered part of the commercial | Inland Fisheries Ireland | This submission has been noted and circulated to the relevant team internally within Coillte, as it sits outside the strategic scope of this FESLUP. |

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| | crop but would be established and maintained for ecological benefits only. | | |
| 46. | 36. Environmental impacts associated with forestry, aerial fertilisation and harvesting needs to be tightly controlled. However, many commercial forestry sites were planted long before the above guidelines were in place and are on ‘difficult sites’ at high altitude with steep slopes and peaty soils. The potential negative impacts on water quality during the establishment and harvesting phases at such sites are likely to outweigh the potential environmental benefits from replanting. It is IFI’s opinion that many of these ‘legacy’ sites would not now be considered as suitable sites for afforestation. When an area for replanting could contribute to a delay in the recovery of that surface water system to good status then no commercial replanting of conifers on these sites may be the only sustainable option. | Inland Fisheries Ireland | As discussed, in the draft FESLUP, Coillte will commence, by the beginning of 2024, the preparation of the Forest Estate Strategic Implementation Plan which will drive the delivery of the FESLUP objectives for the subsequent 10-year period. The Strategic Implementation Plan will take the strategic objectives and translate these into a range of implementable, measurable, actions across specific geographical locations. The Implementation Plan will identify which types of locations will be subject to new forest creation. |
| 47. | 37. IFI recommend an expansion of the physio-chemical and biological monitoring programme in these catchments to address any issues that may arise. In nutrient sensitive water catchments consideration should now be given to the introduction of afforestation exclusion zones, with new plantations prohibited thereby avoiding potential future impacts. | Inland Fisheries Ireland | As discussed, in the draft FESLUP, Coillte will commence, by the beginning of 2024, the preparation of the Forest Estate Strategic Implementation Plan which will drive the delivery of the FESLUP objectives for the subsequent 10-year period. The Strategic Implementation Plan will take the strategic objectives and translate these into a range of implementable, measurable, actions across specific geographical locations. The Implementation Plan will identify which locations will be subject to new forest creation. |
| 48. | 38. While recognising the positive impact of the Forest Service Environmental Requirements for all new first-time planting, we consider that there is an absolute need to extend these revised guidelines to the so-called ‘legacy sites’ which are currently reforested as a default condition of the relevant felling licence without economic or environmental assessment or appraisal. These “difficult sites” are located at high altitude, characterised by steep slopes, often on peaty soils and are difficult to access. In the majority of cases these sites would not meet the basic productivity requirement under the Afforestation Scheme in that the ‘land must be capable of growing to full rotation, a complete timber crop of Sitka spruce of Yield Class 14 or greater, based | Inland Fisheries Ireland | This submission, relating to revising the Forest Service Environmental Requirements aits outside the scope of the FESLUP. |

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| | <p>on one standard application of phosphorus at establishment'. WFD provides overarching legislation that drives sustainable forestry policy and practice - thereby underpinning the requirement that all planting should be subject to rigorous environmental assessment. When an area for replanting could contribute to a delay in the recovery of that surface water system to good status then the only replanting on these sites must be based on the principles established for the Native Woodland Scheme (Riparian Measure) in that they are restorative, nature based and non-commercial.</p> | | |
| 49. | <p>39. Forests for Climate appears to be focussed primarily on CO2. The impacts of climate change include increased temperatures, changes in rainfall patterns, drought and unpredictable weather, all of which can have a negative impact on fish and the associated aquatic habitat. Establishment and management of forest sites with the right trees in the right places, can help to mitigate against the negative impact of climate change through the delivery of ecosystem services such as natural flood management and temperature mitigation</p> | Inland Fisheries Ireland | <p>This submission is noted. As discussed in the draft FESLUP, Coillte will commence, by the beginning of 2024, the preparation of the Forest Estate Strategic Implementation Plan which will drive the delivery of the FESLUP objectives for the subsequent 10-year period. The Strategic Implementation Plan will take the strategic objectives and translate these into a range of implementable, measurable, actions across specific geographical locations. The Implementation Plan will identify which locations will be subject to new forest creation. The implementation plan will further consider with the right trees in the right places, can help to mitigate against the negative impact of climate change through the delivery of ecosystem services such as natural flood management and temperature mitigation.</p> |
| 50. | <p>Forests for Nature 40. IFI believe that many of these “legacy” sites would not now be considered as suitable sites for afforestation other than for nature-based planting and management programmes. While cognisant of Coillte’s obligations to replant under the Forestry Acts, the potential negative environmental impacts on water and habitat during the commercial conifer establishment and harvesting phases at such sites are likely to outweigh the potential environmental benefits from replanting.</p> | Inland Fisheries Ireland | <p>Noted. As discussed, in the draft FESLUP, Coillte will commence, by the beginning of 2024, the preparation of the Forest Estate Strategic Implementation Plan which will drive the delivery of the FESLUP objectives for the subsequent 10-year period. The Strategic Implementation Plan will take the strategic objectives and translate these into a range of implementable, measurable, actions across specific geographical locations. The Implementation Plan will identify which locations will be subject to reforestation.</p> |
| 51. | <p>41. Further planning must be implemented prior to clear-fell operations including the consideration of non-mechanical extraction at sensitive riparian sites. In this regard baseline monitoring, provision of adequate buffer zones including silt-traps with sufficient retention time to facilitate silt removal, ongoing monitoring during and</p> | Inland Fisheries Ireland | <p>This submission is noted and has been flagged to the relevant teams in Coillte. This submission falls under the remit of Coillte operations rather than the FESLUP.</p> |

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| | for six months after clear-fell are among the items that may be necessary to ensure that works do not give rise to conditions contrary to the objectives and aims of WFD. | | | | | | |
| 52. | 42. The Forest Road Manual together with the various Guidelines provides the detail for road construction compatible with environmental values and sustainable forest management. All watercourse crossings must allow for the unhindered movement (upstream and downstream) of fish and aquatic life. The upgrade of roads prior to thinning and clear-fell can provide an opportunity to restore stream crossings which have become an impediment to fish movement IFI would encourage an assessment of all crossings as part of the road assessment needs and would provide technical support on retrofitting solutions to aid fish passage. | Inland Fisheries Ireland | This submission is noted and has been flagged to the relevant teams in Coillte. This submission is related to the project stage. Forest Road works are subject to site-specific environmental assessment, as appropriate. | | | | |
| 53. | 43. Forests for People Angling within Coillte estates should be explored and facilitated where possible. | Inland Fisheries Ireland | This submission is noted and welcomed. Angling will be considered as part of Objective P06 “ <i>Create a system of classification for Recreation Areas, setting out the offer and facilities to be provided for each category</i> ” | | | | |
| 54. | 44. Chapter 4 sub-section 4.2 Forest Estate Objectives Freshwater Pearl mussels are rightly referenced. However, no mention about fish species such as Atlantic Salmon and lamprey that also have special status under the Habitats Directive? The FESLUP does not reference fish species. | Inland Fisheries Ireland | The Appendix to the AA report makes direct reference to the freshwater species of Atlantic salmon, brook lamprey, river lamprey, etc., | | | | |
| 55. | Chapter Ambition 6 of Coillte’s Strategic Vision <table border="1" data-bbox="297 965 1019 1069"> <tr> <td>N015</td> <td>Engage with relevant agencies to improve a science-based understanding of the interaction between forests and water.</td> </tr> <tr> <td>N016</td> <td>Engage with relevant agencies and stakeholders to explore how Coillte can play a role in delivering programmes and measures aimed at enhancing water quality in catchments.</td> </tr> </table> <p>The above ambition is advocated and IFI as a key stakeholder in the water environment welcomes all engagement with Coillte in respect of developing an evidence-based understanding of the interaction between forests and water.</p> | N015 | Engage with relevant agencies to improve a science-based understanding of the interaction between forests and water . | N016 | Engage with relevant agencies and stakeholders to explore how Coillte can play a role in delivering programmes and measures aimed at enhancing water quality in catchments. | Inland Fisheries Ireland | This submission is noted and welcomed. |
| N015 | Engage with relevant agencies to improve a science-based understanding of the interaction between forests and water . | | | | | | |
| N016 | Engage with relevant agencies and stakeholders to explore how Coillte can play a role in delivering programmes and measures aimed at enhancing water quality in catchments. | | | | | | |
| 56. | IFI advocates consideration of the following areas in terms of potential environmental impacts with relevance to Ireland’s inland fisheries resource: <ul style="list-style-type: none"> Water quality | Inland Fisheries Ireland | Noted. Environmental topics were scoped as deemed necessary as part of the SEA. | | | | |

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| | <ul style="list-style-type: none"> • Surface water hydrology • Delivery of additional ecosystem service through nature based planting • Fish spawning and nursery areas • Passage of migratory fish • Areas of natural heritage importance including geological heritage sites • Biological diversity • Ecosystem structure and functioning • Sport and commercial fishing and angling • Amenity and recreational areas • Sediment transport | | |
| 57. | A number of fish species are specifically protected under European Directives. From an IFI perspective all fish species within its remit require protection and management for conservation. IFI would advocate that the precautionary principle would apply in relevant planning at all times. | Inland Fisheries Ireland | Planning applications, as necessary, as well as relevant forest activities will be subject to Screening for Appropriate Assessment (as required under the Forestry Regulations) and therefore any sensitive locations would be captured within this assessment. |
| 58. | <p>We therefore provide some further clarification with regard to the transboundary baseline information outlined in para 5.7.1.1.</p> <ol style="list-style-type: none"> The Planning Act NI 2011 provide the vires to designate listed buildings and Conservation Areas. Accurate statistics for the named heritage assets can be obtained from the DfC HED digital datasets. Given the potential for effects on routeways, bridges etc. it would be important to refer to our Industrial Heritage Record which contains approximately 16,000 records. The Register of Historic Parks and Gardens of Special Interest was revised in 2021 and is available to view at the following link : https://www.communities-ni.gov.uk/publications/register-parks-gardens-and-demesnes-special-historic-interest | NI Department for Communities - Historic Environment Division | Noted. Transboundary baseline information has been considered in the SEA and AA as deemed relevant |
| 59. | Similarly in regard to Ambition 4, C014 and C016, we agree that potential effects on the historic environment remain uncertain in the absence of identified areas, though it is important to note the potential for significant environmental effects on the setting of transboundary cultural heritage assets in relation to offshore and | NI Department for Communities - Historic Environment Division | Noted. As discussed in the draft FESLUP, Coillte will commence, by the beginning of 2024, the preparation of the Forest Estate Strategic Implementation Plan which will drive the delivery of the FESLUP objectives for the subsequent 10-year period. The Strategic Implementation Plan will take the strategic objectives and translate these into a range of implementable, measurable, actions |

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| | onshore wind energy developments, and how those assets are seen, appreciated, understood and enjoyed. | | across specific geographical locations. The Implementation Plan will identify which locations will be subject to new forest creation or any the implementation of any of the plan objectives. |
| 60. | While we agree that the scoring for cultural heritage under Ambition 9, PO1 is uncertain at this stage, we would highlight the potential for positive effects for the historic environment, in line with the AA&CH SEA Objectives, should a heritage led approach be adopted in taking forward masterplans for future visitor destinations. | NI Department for Communities - Historic Environment Division | This response is noted, and it is acknowledged that there is potential for positive effects for the historic environment should a heritage led approach be adopted. Nevertheless, a n uncertain environmental effect is identified in order to take into account the potential for unknown archaeological features on future sites. |
| 61. | Conventions We would also highlight that Table A2, Plans and programmes relevant to ‘Archaeological and Cultural Heritage’ should include the Convention for the Protection of the Archaeological Heritage of Europe (revised) (Valletta, 1992) | NI Department for Communities - Historic Environment Division | Noted. Table A2, Plans and Programmes has been updated accordingly. |
| 62. | DAFM notes their support for the FESLUP and its alignment with the new Forest Strategy for Ireland in delivering the multiple benefits of forests for Climate, Nature, Wood and People. | Department of Agriculture, Food and the Marine | Noted and appreciated |
| 63. | DAFM notes that the FESLUP takes account of the need to manage forests for a number of objectives in a way that best delivers multiple benefits to society, and the important role that Coillte’s ambitious afforestation objectives will play in helping Ireland reach its climate targets. | Department of Agriculture, Food and the Marine | Noted and appreciated |
| 64. | DAFM notes the recent Teagasc Marginal Abatement Cost Curve (MACC) 2023 which outlines a number of potential contributions to climate change mitigation and that the Coillte estate can help deliver on some of these pathways. | Department of Agriculture, Food and the Marine | Coillte notes our approach to “Forests for Climate” has been to assess the estate for its potential to sink and store carbon in the forests and soils, and the potential to substitute carbon intensive products with wood products, to deliver climate mitigation benefits over both the short and long term. Coillte, through our strategic ambitions and FESLUP, is delivering on the MACC climate change mitigation pathways through: Afforestation and our ambition to enable the creation of 100,000 hectares of new forests, that will sink c.18m tonnes of CO2, by 2050; Optimising the age profile and managing the existing Forest Estate to increase the carbon store by 10m tonnes of CO2 by 2050, and; by Redesigning 30,000 hectares of Peatland Forests for climate and ecological benefits by 2050. |

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| | | | <p>In developing our forests for climate ambitions and FESLUP objectives, it is important to note that maintaining an economically strong and sustainable wood and timber sector is essential, not only to deliver the triple “sink, store, substitute” carbon and climate benefits, but to ensure balanced delivery of the multiple benefits for nature and people.</p> <p>The FESLUP recognises the need to improve existing knowledge around the relationship between the forest estate, carbon cycle and climate change. In this regard the FESLUP objectives include commitments to continue to invest in research and science to further extend our understanding of forest design and management as well as refining our understanding of how we manage carbon in forests.</p> |
| 65. | DAFM welcomes the ambition in relation to “Forests for Wood” and the emphasis of the strategy on the importance of harvested wood products (HWP) and its potential to decarbonise the build economy. DAFM also notes the alignment of the FESLUP with the objectives of Ireland’s Forest Strategy in terms of expanding the forest estate to deliver lasting climate change benefits through Harvested Wood Products and their role in decarbonising the built economy. | Department of Agriculture, Food and the Marine | Noted and appreciated |
| 66. | DAFM notes that Coillte’s forestry strategic vision is in alignment with the latest Shareholder Letter of Expectation. DAFM also notes the importance of continuing to prioritise sustainable forest management and the protection of the environment within the management of the Coillte estate with the proposed creation of 100,000 ha of afforestation over the lifetime of the FESLUP. | Department of Agriculture, Food and the Marine | Coillte notes that the management of the forest estate, and our ambitions to enable the creation of 100,000ha forests, will be carried out using sustainable forest management and environmental practices to ensure the protection of Ireland’s natural and cultural heritage. |
| 67. | the Department welcomes the ambition in relation to “Forests for Wood” and the emphasis of the strategy on the importance of harvested wood products (HWP) and its potential to decarbonise the built economy. | Department of Agriculture, Food and the Marine | Noted and appreciated. Coillte acknowledge that a greater use of HWP will make a significant contribution to carbon removal in the LULUCF sector. |
| 68. | It is also an ambition of the plan to provide for inclusive, accessible, and high-quality recreational services across the Coillte estate. In this context, it may be useful to review the recently published guidance document by the Environmental Protection Agency (EPA)- “Good practice guidance on SEA for the Tourism Sector”. | Fáilte Ireland | Noted and appreciated. The SEA has been carried out with due regard to the Environmental Protection Agency (EPA)- “Good practice guidance on SEA for the Forestry Sector”. |

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| 69. | Table 9.2 NED welcome the monitoring measures outlined in the SEA for biodiversity flora and fauna. The annual Northern Ireland Environmental Statistics Report and Northern Ireland State of The Environment Report should also be included as monitoring indicators. These can be found at, State of the Environment Report 2013 Department of Agriculture, Environment and Rural Affairs (daera-ni.gov.uk) Northern Ireland environmental statistics report Department of Agriculture, Environment and Rural Affairs (daera-ni.gov.uk) | Department of Agriculture, Environment and Rural Affairs Northern Ireland (DAERA) | Noted. Table 9.2 has been updated to include the two DAERA reports as monitoring sources. |
| 70. | Monitoring must be subject to review at each reporting stage to reflect new data obtained. It essential that interventions (including additional mitigation measures or plan revisions where required) are undertaken if any unforeseen or adverse environmental effects to the aquatic environment are identified during the monitoring regime. | Department of Agriculture, Environment and Rural Affairs Northern Ireland (DAERA) | The Monitoring table and commitments will be reviewed as part of any future SEAs of Coillte plans. |
| 71. | <i>‘Nitrogen deposition at ecological areas that are sensitive to nitrogen is not increased’</i> . It would be useful to know specifically how this measure will be implemented, particularly as 27% of Coillte’s biodiversity areas is described as bog (Figure 5.2 within SEA Environmental Report). Bogs are considered particularly sensitive to the effects of atmospheric nitrogen, as they are a naturally nutrient poor habitat. Native forest can also be sensitive if there is a rich lichen and bryophyte assemblage. | Department of Agriculture, Environment and Rural Affairs Northern Ireland (DAERA) | This measure will be implemented by determining the likely generation of nitrogen deposition and the sensitivity of nearby sites to nitrogen. It is unlikely that activities arising from the implementation of the FESLUP will result in an increase in nitrogen deposition. However, where there is the potential for an increase, measures will be implemented to ensure no impacts arise |
| 72. | <i>“Developing an appropriate set of monitoring standards”</i> for Air Quality (page 140 within SEA Environmental Report). Further information on what these monitoring standards will be for monitoring air quality impacts would be useful. | Department of Agriculture, Environment and Rural Affairs Northern Ireland (DAERA) | The section in the SEA Environmental report states that <i>‘Monitoring of the draft FESLUP, its objectives and performance against any ambitions set out. Particularly, in developing an appropriate set of monitoring standards for environmental parameters relevant to Coillte’s estate and activities’</i> . This has been updated to state <i>‘monitoring of the draft FESLUP, its objectives and performance against air quality standards’</i> . |
| 73. | AA Screening NIS Report – Aerial fertilisation is considered a potential pathway for deposition of air pollutants, including nitrogen oxides and ammonia (Section 5.4). A number of designated sites within Northern Ireland have been identified as sites in which there is potential for transboundary impacts. Mitigation | Department of Agriculture, Environment and Rural Affairs Northern Ireland (DAERA) | Potential for impacts due to aerial fertilisation shall be captured at project level AA Screening. |
| 74. | Relationship with Other Relevant Plans, Programmes and Legislation | Department of Agriculture, | Appendix A2 has been updated to include reference to Northern Ireland marine policy, legislation plans and programmes. |

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| | Appendix A3 indicates Northern Ireland marine policy, legislation, plans and programmes have been acknowledged. However, this does not appear evident in A2 of the Environmental Report. | Environment and Rural Affairs Northern Ireland (DAERA) | |
| 75. | Environmental Baseline and SEA Objectives Marine aspects are included within the SEA Objectives for Biodiversity, Water and Landscape. However, it is noted the environmental baseline for the Water and Landscape topics do not refer to marine aspects. For example, the transboundary baseline for water is acknowledged in relation to Water Framework Directive but not for Marine Strategy Framework Directive; and seascape is not included in the transboundary baseline for Landscape. | Department of Agriculture, Environment and Rural Affairs Northern Ireland (DAERA) | Noted. The SEA ER has been updated in Section 5.5 to include a greater detailed account of the water quality of coastal waters in the ROI and NI. |
| 76. | Transboundary Impacts The potential for transboundary impacts to occur in Northern Ireland has been highlighted. It is noted these are not specific to the marine environment and that there is no potential for significant transboundary effects highlighted for the marine environment in the Environmental Report. | Department of Agriculture, Environment and Rural Affairs Northern Ireland (DAERA) | Noted- this is correct. The SEA does not predict any potential for significant marine effects as a result of plan implementation |
| 77. | Nationally, the 8,000 hectares per annum sectoral afforestation goal does not appear to be consistent with supporting achievement of the climate neutrality goal based on EPA-funded research (https://www.plantagbiosciences.org/project/sequester/homepage/). This research found that between 13,000 hectares and 40,000 hectares per annum of afforestation would be needed from 2025 to 2050 to offset projected CO2 and N2O emissions from the agriculture sector, with the lower level relying on a 75% reduction in agricultural emissions combined with a substantial rewetting programme of agricultural organic soils. | EPA | Noted. The national ambition for sectoral afforestation is outside the remit of Coillte. Within the FESLUP Coillte have outline objectives to help deliver the Coillte Ambition of enabling 100,000 Ha of afforestation within the period of the plan. |
| 78. | Water quality impacts can arise due to acidification, nutrient and sediment mobilisation, and modifications to the physical habitat conditions of water courses through drainage. These impacts occur during forestry activities such as planting, thinning and clear-felling can cause a substantial decline in water quality, by as | EPA | This response is noted and it is acknowledged that forestry can result in multiple environmental benefits in a catchment context. |

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| | much as two or sometimes three status classes. Once the forests become stable, the water bodies can recover within a few years. The FESLUP should emphasise how forestry can achieve multiple environmental benefits in a catchment context. For example, planting native woodland in low-lying poorly drained riparian zones can provide multiple environmental benefits. | | |
| 79. | The integration of the SEA ER in the FESLUP will maximise the potential for overall positive environmental outcomes. It is recommended that the mitigation measures associated with the SEA ER are incorporated into the main body of the FESLUP text rather than as an Appendix. | EPA | The SEA and NIS mitigation measures have been incorporated into the main body of the FESLUP. |
| 80. | The FESLUP should promote compliance with the extensive suite of forestry guidelines and policies available, including those relating to water quality. Coillte should ensure a governance structure is established that ensures the available forestry related guidance and protocols are implemented in full within the forest sector to mitigate against forestry activities having an impact on water quality. | EPA | This submission is noted and has been circulated to the relevant teams in Coillte. Coillte is committed to ensuring that the available forestry related guidance and protocols are implemented in full within the Coillte managed forest estate. |
| 81. | In terms of the proposed mitigation measures, there is merit in clarifying whether they relate to the existing forest estate or more reflective of the proposed expanded forestry estate | EPA | The mitigation measures relate to the entire estate- existing and future expanded estate. |
| 82. | We note the 11 ambitions of the Strategic Vision set out in Section 3.2. It would be helpful if the vision could also indicate whether it relates to and supports achieving 18% forest cover target by 2050. | EPA | As outlined in the FESLUP, it is an ambition and objective of Coillte to “ <i>Enable the creation of 100,000 ha of new forests, half of which will be native woodlands, which will sink 18m tonnes CO2 by 2050.</i> ” This will contribute to and support achieving the target of 18% forest cover by 2050. |
| 83. | There would be merits in establishing environmental selection criteria for the identification of suitable lands for future afforestation and reforestation activities. This will be particularly relevant in the context of the proposed additional land acquisition for forestry and forestry related activities | EPA | Coillte have established environmental selection criteria as part of the ongoing land-use modelling work discussed in Section 3.4 of the FESLUP. The Strategic Implementation Plan, which will follow this FESLUP (as discussed in Section 1.1 of the FESLUP) will provide information on that criteria and how it has been applied. |
| 84. | Consideration should be given to the preparation of catchment-based forestry management plans at the regional and local level. These would help implement the FESLUP in a coordinate manner both regionally and locally. These should be screened in relation to the requirements of the SEA and Habitats Directive assessments. | EPA | The Strategic Implementation Plan will be created at national level, however the plan will be reported at a regional level |
| 85. | In relation to Ambition 1 (associated with creation of 100,000 ha of new forests), should CO2 not be written to ensure that Coillte | EPA | Noted. Coillte’s Strategic Vision and the 11 Ambitions have already been published and adopted, so there is no opportunity for updating the ambitions text |

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| | forestry ambitions aligns with national policy and regulations, and not the other way around, as currently presented? | | at this stage. Nevertheless, Coillte is fully committed to aligning with national policy and hope this becomes evident from the FESLUP objectives. |
| 86. | In Ambition 2 (related to peatland redesign), in CO6, we recommend clarity be provided regarding what “re-design of peatlands at scale” may involve. Peatlands being natural habitats may not easily be re-designed, and should rehabilitation/restoration be what is proposed? | EPA | Redesign of peatlands will include a range of solutions including rewetting and rehabilitating where possible, and taking other options into account where this is not feasible such as, for example, establishing native and mixed woodlands. The scale of the ambition relating to the redesign of peatlands is acknowledged and as noted presents particular challenges in an area in which science and understanding is continually evolving. In this regard revised Objective CO7 seeks to clarify redesign by “Continuously develop guidelines for the redesign of peatlands based on best international practice and informed by suitably qualified professionals” with the intention of delivering at a “scale” which meets the stated ambition. |
| 87. | In CO8 (related to establishing monitoring and management frameworks for redesign of peatlands), we recommend also adding a reference to “implementing” the monitoring and management framework for the peatlands. The use of the term ‘redesign’ should also be reconsidered | EPA | The suggested word changing has been incorporated into the FESLUP. |
| 88. | Ambition 4 (related to renewable energy), we suggest that a commitment is made to align with Eirgrid’s Grid Implementation Plan to ensure any renewable energy developments established over the lifetime of the Plan are managed in a coordinated and collaborative manner. | EPA | This response is noted. Coillte will be developing policy for renewable energy as identified in CO16 - it will consider Eirgrid’s Grid Implementation Plan and will support renewable energy developments over the lifetime of the Plan |
| 89. | Ambition 5 (related to biodiversity support), in NO2 (management plans for biodiversity areas) you should consider where these proposed management plans for biodiversity areas may require SEA/AA Screening, where relevant and appropriate. | EPA | This response is noted. Proposed mitigation for N02 within the NIS provides for the potential to implement an Appropriate Assessment screening as necessary, for any relevant management plans. |
| 90. | Ambition 6 (forestry for nature management), in NO5 (related to metrics, indicators and monitoring), we suggest that the results of the monitoring carried out be made publicly available on an annual basis where possible. This will help inform both the FESLUP and SEA monitoring considerations. | EPA | As set out in Objective NO5, it is an objective of Coillte to “ <i>Develop metrics, set targets and develop an effective regime to monitor and report on key environmental parameters on the Coillte estate; including valuable habitats / species and the ecological benefits of biodiversity management actions.</i> ” Once this monitoring framework has been established, Coillte will endeavour to make the monitoring data publicly available. |
| 91. | In NO6 (identify biodiversity areas), we note the intention to continue to identify areas for further biodiversity improvement and nature conservation. The recently published Tailte Eireann and EPA land cover mapping may be useful to support this work. | EPA | This submission is noted and welcomed. |

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| 92. | In NO8 (related to protocols for managing biodiversity areas), once the protocols to manage sites are established to improve nature conservation value, we suggest that suitable training and awareness campaigns are carried out for staff and contractors involved in operating within or adjacent to those areas. | EPA | This submission is noted. Coillte is committed to supporting the provision of education and training in a range of forestry sectors and forestry related sectors. Refer to Objective PO12, PO13, and PO14 of the FESLUP. |
| 93. | Ambition 9 (tourism related considerations), regarding PO1 to PO5, Failte Ireland have prepared Visitor Experience and Destination Experience Development Plans for different areas around the country that could be considered. Their regional tourism strategies could also be useful to consider. | EPA | This submission is noted and welcomed. |
| 94. | Ambition 10 (recreation related), In PO6, when establishing a classification system for recreation areas setting out the facilities to be provided, a review of the existing services and infrastructure should also be looked at. This is to avoid aspects such as littering, erosion/trampling of vegetation, noise/lighting disturbance to species, traffic congestion/parking issues etc). The management of sites should include suitable monitoring to ensure that the services provided are sufficient to cater for numbers using the areas. | EPA | This submission is noted and has been flagged to the relevant Coillte teams. PO7 sets out Coillte’s commitment to ‘Develop assessment criteria to identify locations for future Recreational Areas.’ Consideration will be had to existing services and infrastructure during the identification of this criteria. |
| 95. | In PO7, looking to identify future recreational areas, consider using tools such as environmental sensitivity mapping information to avoid more sensitive areas for example. | EPA | This submission is noted. As discussed in the draft FESLUP, Coillte will commence, by the beginning of 2024, the preparation of the Forest Estate Strategic Implementation Plan which will drive the delivery of the FESLUP objectives for the subsequent 10-year period. The Strategic Implementation Plan will take the strategic objectives and translate these into a range of implementable, measurable, actions across specific geographical locations. The Implementation Plan will identify which locations will be subject to new recreational areas. Ongoing land-use modelling is being utilised in this exercise, and existing data and mapping tools will be utilised during such process. |
| 96. | The FESLUP should consider including a commitment that together with the DAFM, Coillte will support the National Ecosystems Monitoring Network (NEMN), established under the National Emissions Ceiling Directive, given its importance as a key network that will assist in monitoring the impact of air emissions on ecosystems, including forests. | EPA | As set out in Objective NO5, it is an objective of Coillte to “ <i>Develop metrics, set targets and develop an effective regime to monitor and report on key environmental parameters on the Coillte estate; including valuable habitats / species and the ecological benefits of biodiversity management actions.</i> ” Once this monitoring framework has been established, Coillte will consider including a commitment to support the National Ecosystems Monitoring Network in future revisions of the FESLUP, or indeed the Implementation Plan. |
| 97. | We note the inclusion of the section in the FESLUP relating to Monitoring and Review (Section 5.3). This section would benefit | EPA | As discussed in the draft FESLUP, Coillte will commence, by the beginning of 2024, the preparation of the Forest Estate Strategic Implementation Plan which |

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| | from further detail in terms of monitoring and implementation. A set timeframe for review of the implementation measures would provide an opportunity to evaluate delivery and to reflect relevant external changes, including environmental considerations. | | will drive the delivery of the FESLUP objectives for the subsequent 10-year period. The Strategic Implementation Plan will take the strategic objectives and translate these into a range of implementable, measurable, actions across specific geographical locations. The Implementation Plan will set out greater detail on the implementation timelines for the delivery of the plan objectives. The FESLUP reviews will be aligned with reviews of the Implementation Plan and will be carried out every five years. The review and monitoring results of the plans will be made publicly available. |
| 98. | We recommend aligning the implementation monitoring/reporting of the FESLUP with the environmental monitoring required under the SEA legislation. There may be merits in aligning the periodic reviews of the FESLUP with existing cyclical reporting e.g. State of Environment reports, etc. The requirements for SEA and AA should also be considered in future reviews of the FESLUP if future modifications are proposed to the Plan. | EPA | This comment is noted and welcomed. The requirements for SEA and AA will be considered in future reviews of the FESLUP if future modifications are proposed to the Plan. |
| 99. | We note that many of the documents referred to on p52 are nearly 20 years old. We suggest a commitment is used to review any existing guidance materials and update as necessary with a view to ensuring they remain consistent with existing environmental regulations and policy requirements and consider any relevant key national and sectoral plans and programmes. | EPA | This submission is noted and agreeable. As outlined on page 51 of the draft FESLUP, “...any future variations or amendments to these documents (or other new guidance/policies of relevance that may be adopted), will be reviewed and complied with, as appropriate, prior to the implementation of any of the measures or actions set out in the draft FESLUP” |
| 100. | It would be useful for the SEA ER to include any recommendations and mitigation measures from the Natura Impact Statement and discuss how these will be incorporated into the FESLUP. | EPA | Please see Appendix A4 for further detail on the mitigation measures proposed by the Natura Impact Statement and how they could be incorporated into the FESLUP. |
| 101. | The EPA’s SEA Section has also produced a Good practice note for SEA of the Forestry Sector (EPA, 2019) that would be useful to refer to and consider in finalising the SEA. | EPA | Noted – The Good Practice note was used as a source of guidance throughout the SEA process. Reference to the note was included in Section 1.2.3 of the SEA ER. |
| 102. | Non-Technical Summary: We recommend that a summary of the evolution of the area in the absence of the FESLUP is included in the Non-Technical Summary. A summary of the existing environmental problems could also be included. Annex I(b) of the SEA Directive requires that the SEA ER provide information relating to the relevant aspects of the current state of the environment and its likely evolution without implementation of the plan or programme. The Non-Technical Summary should | EPA | Noted – The Non-Technical Summary of the SEA ER has been updated to include a summary of the likely evolution of the environmental baseline in the absence of the FESLUP. |

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| | include a description of the likely evolution of the current state of the environment without the implementation of the FESLUP. This is an important element to include, as the environmental baseline at the end of the plan period may be quite different from the baseline at the beginning. It would also give an indication of likely cumulative impacts affecting the plan over its lifetime. For example, in the case of the FESLUP this analysis could look at the increase/decrease of afforestation rates without the plan, floods and droughts affecting tree/forest health, etc | | |
| 103. | There is also an opportunity to include an explanation for the target audience/stakeholders to further understand the importance of siting forestry in areas and on soils where significant emissions can occur. This is potentially a very serious issue in terms of the scale of the CO2 emissions, impact, as already seen in the EPA's most recent National Inventory Report (https://www.epa.ie/publications/monitoring--assessment/climate-change/air-emissions/irelands-national-inventory-submissions-2023.php) | EPA | The SEA Environmental Report states in response to Objective C07 'continuously develop guidelines for the redesign of peatlands based on best Irish and international practice' that <i>overall potential positive impacts have been assessed for this objective, whereby guidelines for the redesign of peatlands developed based on best Irish and international practice, will be based upon best available and emerging scientific evidence, which is likely to benefit the long-term quality of Irish peatlands and has potential to aid the associated environmental challenges that are currently faced with Irish peatlands. Otherwise, neutral environmental impacts have been assessed as likely to occur. It is a recommendation of this SEA that this objective includes the following text 'Develop guidelines for the redesign of peatlands based on best available techniques and best emerging scientific evidence, relevant to Irish and international peatlands'</i> . This is considered sufficient to highlight the importance of siting forestry in appropriate areas. |
| 104. | It would be useful to clarify whether consultation with the Public Bodies in Northern Ireland had been considered. A reference to this consultation and its outcome should be included in the SEA ER and SEA Statement as relevant. The relevant requirements of the SEA protocol (<i>UNECE Protocol on Strategic Environmental Assessment to the Convention on Environmental Impact Assessment in a Transboundary Context</i>) under the ESPOO Convention should be taken into account, for any transboundary consultations with non-EU Member States. | EPA | The environmental authority for Northern Ireland, the Department of Agriculture, Environment and Rural Affairs (DAERA), was included in the consultation process and a response to the SEA ER was received from DAERA. A summary of their response has been added to the SEA ER in Appendix A3. |
| 105. | The forest area referenced (first reference on page 3 of the draft SEA ER) is 808,848 ha. This does not reflect the published figure from the most recent published National Forest Inventory (770,020 ha). If this is preliminary, unpublished, data from the 4th Forest Inventory this should be noted. | EPA | The total forest area figure of 808,848 ha was quoted from the 4th National Forest Inventory which was published in 2022. A reference to the report has been added to page 3 of the SEA ER for clarity. The text in Section 5.6.1.4 has been updated to reflect that the carbon stock is associated with the 2017 total forest area. |

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| | On page 67 of the SEA, we understand that the carbon reservoir of 312 million tonnes of carbon referred to on page 8 of the SEA ER relates to the older forest area (770,020 ha). Ideally, this should be updated with a figure relevant to the updated area above or clarified in the text | | |
| 106. | Coillte should ensure that the FESLUP aligns with key relevant higher-level plans and programmes such as the Common Agricultural Policy Strategic Plan 2023-2027 and its guiding European legislation; the Climate Action Plan 2023 (and the upcoming Climate Action Plan 2024), the Draft National Biodiversity Action Plan and the relevant aspects of the draft River Basin Management Plan 2022-2027. | EPA | Section 3.2 of the SEA ER outlines how the FESLUP is aligned with the Common Agricultural Policy Strategic Plan 2023-2027 and its guiding European legislation. |
| 107. | We welcome the inclusion in the SEA ER of the schematic illustrating the national & European policies and plans with which the FESLUP is linked in Figure 3.1. It would also be useful to include a similar schematic within the FESLUP. Clarity should also be provided on how DAFM's policies/strategies for management of forests and forestry activities relate to the FESLUP and to Coillte. There is also merit in including the relevant national and regional renewable energy, biodiversity and tourism plans, given the linkages with certain ambitions of the FESLUP related to biodiversity, renewable energy and tourism/recreation. | EPA | The same graphic from the SEA ER has been included in the FESLUP. Many of the forest operational activities associated with delivery of the objectives of the draft FESLUP require licencing, DAFM as the main regulator will ensure governance on these activities. Coillte is also committed to any future iterations of DAFM policies/ strategies and requirements. The plans relating to biodiversity, renewable energy and tourism / recreation shall be highlighted within the list of relevant national and regional plans. |
| 108. | It would be useful to include reference in the SEA ER relating to the FESLUP relevant UN Sustainable Development Goals (SDGs), in particular SDGs 13 (Climate Action) and 15 (Life on Land), reflecting the SDG principle that land be appropriately managed to achieve social, economic and environmental objectives. | EPA | This comment is welcomed, and the SEA ER has been updated accordingly. |
| 109. | It would be useful for the SEA ER/ NTS to include a section that summarises the environmental problems associated with the existing environmental topics such as monoculture conifers, issues with dieback and excessive levels of nutrients entering water courses. | EPA | This comment has been noted. A summary of the main environmental problems associated with the existing environmental baseline has been added to the Non-Technical Summary. |
| 110. | Our scoping submission noted several opportunities where the SEA ER could examine trends e.g. greenhouse gas emission projections, areas for potential land use change over the lifetime | EPA | Noted – Please see Section 5, Current State of the Environment for further details. |

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| | of the plan, etc. This would help to inform the plan development, ensuring that proposed actions and measures would be sufficient to meet the various environmental targets and objectives. | | |
| 111. | In addition to the CORINE data used to identify land use, land use change and forestry, the Taillte Eireann have launched a detailed high resolution landcover map. This will be an important resource for future forest management and forward planning, during the lifetime of the FESLUP. | EPA | This comment is welcomed. It is intended that the new Taillte Eireann landcover map be used on a local scale, while the CORINE map be used for national scale plans. |
| 112. | The SEA ER in the Appendix, includes a very useful map of environmental sensitivity (Figure A18). It would also be useful to summarise how this map was generated. The FESLUP would benefit from incorporating a spatial element, taking into consideration the sensitivity map. | EPA | Information as to how this map was generated has been included in the SEA Environmental Report |
| 113. | The competing land needs of forestry and renewable energy, in line with the national targets for both sectors in the FESLUP and the upcoming Renewable Electricity Spatial Policy Framework, should also be considered in terms of the cumulative impacts on land use and land cover for the country. | EPA | Noted. Section 8.4 of the SEA ER has been updated to reflect the competition for land between Coillte’s draft FESLUP and the Renewable Electricity Spatial Policy Framework. |
| 114. | We note the objectives, targets and indicators are set out in Table 6.1. Under ‘Biodiversity, Flora and Fauna’ component, and suggest the first draft target refer to “No deterioration of protected habitats...”, rather than “no loss of protected habitats...”. | EPA | Noted. Table 6.1 of the SEA ER has been updated accordingly. |
| 115. | The SEA ER provides an extensive list of mitigation measures in Table 9.1 – Proposed Mitigation Measures. We note that some mitigation measures listed are measures already incorporated in various DAFM and Coillte guidelines, standards documents and policies. It would be helpful to differential between mitigation measures related to forestry activities in general and mitigation measures related to the FESLUP itself. The challenge will be to ensure that the mitigation measures proposed will successfully mitigate the identified impacts of the FESLUP | EPA | Noted – Table 9.1 has been updated to clarify what mitigation measures are general forestry-related measures that have already incorporated in various DAFM and Coillte guidelines, standards documents and policies and mitigation measures which are FESLUP-specific. |
| 116. | EPA Guidance on SEA-related monitoring is available at https://www.epa.ie/publications/monitoring--assessment/assessment/strategicenvironmental-assessment/06695-EPA-SEA-Statements-and-Monitoring-Report.pdf . The Monitoring Programme should be flexible to take account of specific environmental issues and unforeseen adverse impacts should they arise during implementation. It should consider and | EPA | This comment is welcomed and was considered during the writing of the SEA ER. |

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| | deal with the possibility of cumulative effects. Monitoring of both positive and negative effects should be considered. | | |
| 117. | The mitigation measures and recommendations from the SEA Environmental Report and the Appropriate Assessment should be incorporated into the main text of the FESLUP rather than the Appendix. | EPA | A new chapter has been added to the FESLUP titles 'Environmental Considerations' which describes how environmental considerations were incorporated into the plan making process. The chapter also contains all of the SEA and NIS mitigation measures. |
| 118. | The FESLUP would benefit from the inclusion of a separate section or chapter related to "Environmental Assessment" showing how the assessment process and the SEA recommendations have been integrated into the FESLUP. In particular, the FESLUP should include clear commitments to implement the recommendations and mitigation measures identified in the SEA ER | EPA | A new chapter has been added to the FESLUP titles 'Environmental Considerations' which describes how environmental considerations were incorporated into the plan making process. The chapter also contains all of the SEA and NIS mitigation measures. |
| 119. | Similarly, the FESLUP should include an additional table related to how the findings and recommendations of the Appropriate Assessment have been reflected in the final plan. | EPA | A new chapter has been added to the FESLUP titles 'Environmental Considerations' which describes how environmental considerations were incorporated into the plan making process. The chapter also contains all of the SEA and NIS mitigation measures. |
| 120. | Any future amendments to the FESLUP should be screened for likely significant effects, using the same method of assessment applied in the "environmental assessment" of the FESLUP. | EPA | Any future amendments to the FESLUP will be screened for likely significant effects, using the same method of assessment applied in the "environmental assessment" of the FESLUP. |
| 121. | <p>Once the FESLUP is adopted, an SEA Statement should be prepared that summarises:</p> <ul style="list-style-type: none"> • How environmental considerations have been integrated into the FESLUP; • How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the FESLUP; • The reasons for choosing the FESLUP adopted in the light of other reasonable alternatives dealt with; and, • The measures decided upon to monitor the significant environmental effects of implementation of the FESLUP. <p>A copy of the SEA Statement with the above information should be sent to any environmental authority consulted during the SEA process. EPA guidance on preparing SEA Statements is available at the following link:</p> | EPA | This comment was noted and referred to when writing the SEA Statement. |

<https://www.epa.ie/publications/monitoring--assessment/assessment/strategicenvironmental-assessment/06695-EPA-SEA-Statements-and-Monitoring-Report.pdf>

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| 122. | <p>In accordance with the SEA Regulations the following authorities should be consulted with:</p> <ul style="list-style-type: none"> • Environmental Protection Agency; • Minister for Housing, Local Government and Heritage; • Minister for Environment, Climate and Communications; and, • Minister for Agriculture, Food and the Marine | EPA | All of the listed authorities have been consulted with as part of the SEA process. |
| 123. | <p><i>Ambition 1: Enable the creation of 100,000 ha of new forests, half of which will be native woodlands, which will sink 18m tonnes CO2 by 2050.</i></p> <p><i>CO3: Support Local and National Government to develop afforestation opportunities on suitable publicly owned lands.</i></p> <p>FS would be strongly supportive of engagement with the agricultural and public sector on woodland expansion. Current work ongoing in the delivery of the Forests for Our Future programme include a specific focus on realising the potential for woodland creation on land currently owned, controlled or managed by government departments and councils. This is being considered through an Afforestation Forum established by the DAERA Minister.</p> | DAERA Forest Service | This submission is welcome and noted |
| 124. | <p><i>CO4: Collaborate with key stakeholders to explore options for farmer led afforestation.</i></p> <p>Experience of relying on schemes like the NI Forestry Strategy indicates that reliance on such schemes alone will be insufficient to meet Northern Ireland’s woodland expansion targets. Farmer led afforestation will be a key component of this.</p> | DAERA Forest Service | This submission is noted and welcome. |
| 125. | <p><i>Ambition 2: Redesign 30,000 ha of Peatland Forests for climate and ecological benefits by 2050.</i></p> <p><i>CO6: Synthesise existing information to identify potential location(s) for the redesign of peatlands at scale.</i></p> | DAERA Forest Service | This submission is noted and welcome. As discussed in the draft FESLUP, Coillte will commence, by the beginning of 2024, the preparation of the Forest Estate Strategic Implementation Plan which will drive the delivery of the FESLUP objectives for the subsequent 10-year period. The Strategic Implementation Plan will take the strategic objectives and translate these into a range of implementable, measurable, actions across specific geographical locations. The |

CO7: Continuously develop guidelines for the redesign of peatlands based on best Irish and international practice.

The FS forest management planning programme reviews the sustainable management of our forests and applies a Strategy for Restoring Peatland Habitats. This has identified unplanted and forested areas within FS peatland forests most suitable for restoration. Many of these, in border counties of NI, have the potential to share hydrological connectivity with the Coillte estate and FS would welcome co-ordination both in redesign decisions and sharing of best practices as restoration operations are being scoped and commissioned.

Implementation Plan will identify which locations will be subject to new recreational areas. Ongoing land-use modelling is being utilised in this exercise, and existing data and mapping tools will be utilised during such process. The Implementation plan will be subject to consultation with DAERA Forest Service.

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| 126. | <i>Ambition 4: Generate an additional 1 Gigawatt of renewable wind energy to power 500,000 homes by 2030.</i> | DAERA Forest Service | This submission is noted. |
| | FS has, in recent years, undertaken an initial assessment of the potential for our estate to facilitate renewable wind energy generation. The Forestry Act 2010 (the Act) sets out the general duty for DAERA to promote the expansion of forest cover and sustainable forest management. The Act includes powers to use forest land for non-forestry purposes, provided due regard is given to the general duty, and engage in public and private partnerships including through investment in corporate delivery bodies. This work is not currently being taken forward. | | |
| 127. | <i>Ambition 5: Enhance and restore biodiversity by increasing the area of our estate managed primarily for nature from 20% to 30% by 2025.</i> | DAERA Forest Service | This submission is welcome and noted. |
| | FS are supportive that through responsible forest management, both FS and Coillte is committed to maintaining and improving biodiversity and environmental enhancement of their forest estates. 24% of the FS forest estate is designated for nature conservation, which includes 19% of land growing trees. | | |
| 128. | <i>Ambition 6: Transform areas of our forests so that 50% of our estate is managed primarily for nature in the long-term.</i> | DAERA Forest Service | This submission is noted and welcome. |

NO4: Continue to increase the implementation of alternative silvicultural systems including continuous cover forestry (CCF) in forests of ecological value.

FS would have similar ambitions to this objective and would like to expand CCF in areas of ecological value and also more generally where timber production is the main objective. A barrier to this is experienced and trained practitioners and FS would be keen to continue to engage with Coillte and the wider sector in any knowledge transfer or training events to further this.

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| 129. | <i>Ambition 7: Produce 25m cubic metres of certified Irish timber, to support the construction of 300,000 homes by 2030.</i> | DAERA Forest Service | This submission is welcome and noted. |
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WO1: Maintain production capacity to harvest and supply certified roundwood to support the wood processing industry.

FS would like to express the general point that supply arrangements of forest products to industry occurs at an all-Ireland level on a cross border basis and that we share a common objective to maintain a healthy, efficient and competitive wood processing sector.

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| 130. | <i>WO3: Work with other contributors to produce a medium-term all-Ireland roundwood forecast on a regular basis.</i> | DAERA Forest Service | This submission is welcome and noted. |
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FS remains committed to engage with COFORD and others in the provision of relevant data on production forecasting and timber availability.

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| 131. | <i>Ambition 8: Promote the use and benefits of wood products to increase the level of timber homes from 20% to 80% by 2050.</i> | DAERA Forest Service | This submission is welcome and noted. |
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FS is supportive of all these objectives and intends to continue to provide confidence of future timber availability to the market through the operation of contract arrangements that encourage value adding innovation and technological advancements to drive efficiency within the sector and at the same time stimulating healthy open market competition and the use of wood products generally.

132.

Ambitions 9, 10 and 11: Forest for people.

DAERA Forest
Service

This submission is welcome and noted.

FS and Coillte have agreed in their MoU that recreation and the public use of our forests is an important and integral dimension of both parties planning and management objectives. As well as the benefits to health and well-being our forests offer great opportunities to deliver an array of government objectives ranging from active participation in sport to rural development. Our MoU allows us to co-operate in the development of recreation and social use products on a cross-border basis where greater benefits can be achieved by joint working.

An estimated 8.97 million visits were taken to forests on the FS estate in 2019, and it is expected that the number of visitors has significantly increased since the onset of covid. Forest Service, in partnership with councils and others, have developed and expanded recreation provision across its estate; opportunity exists to do this on a cross border basis.