

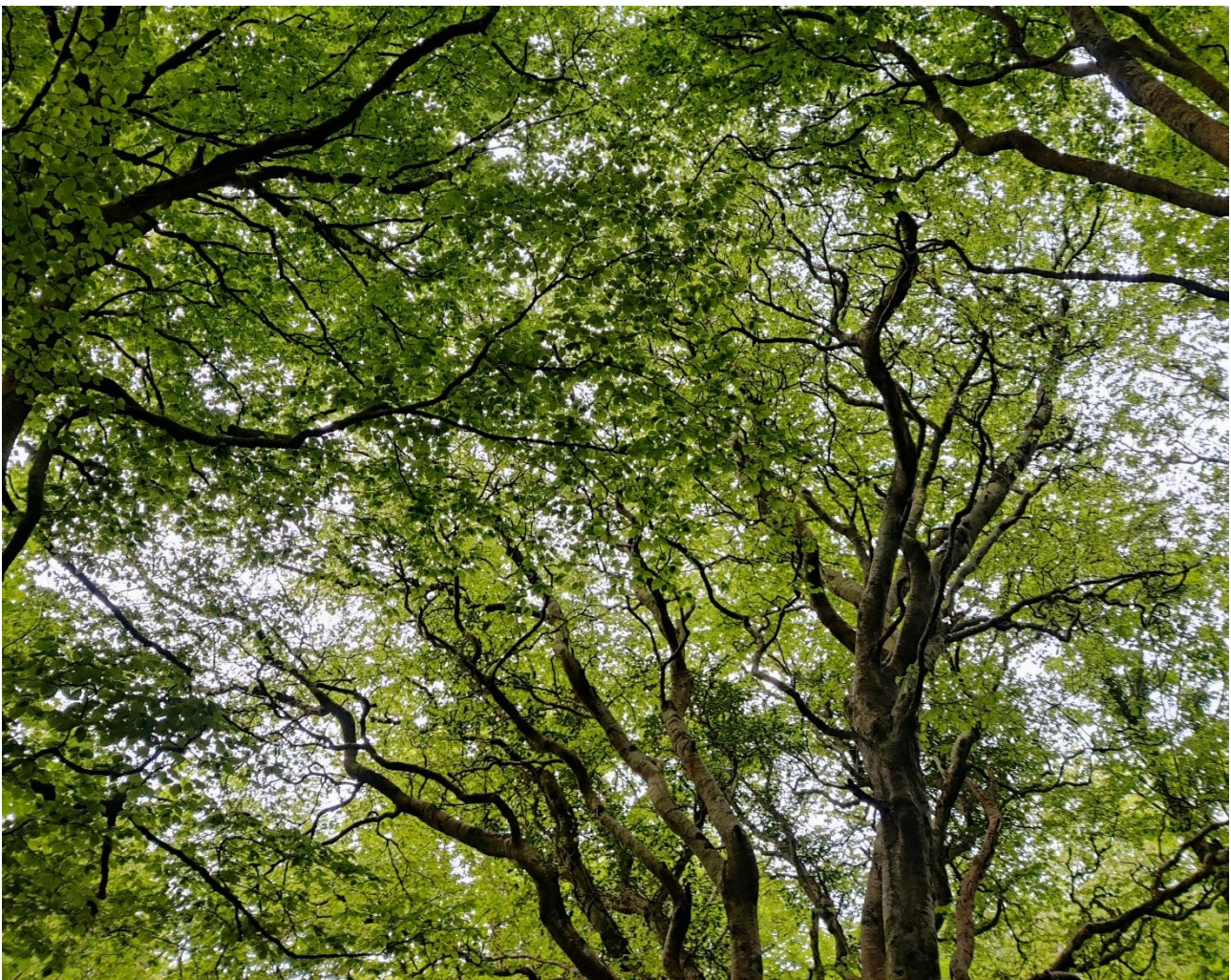
Coillte

# Coillte's Forest Estate Strategic Land Use Plan (FESLUP) 2023-2050

Strategic Environmental Assessment (SEA) Statement

Reference: Issue

1 | 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 294083

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# 1. Introduction

## 1.1 The Purpose of the SEA Statement

This Statement forms part of the Strategic Environmental Assessment (SEA) of Coillte's adopted Forest Estate Strategic Land Use Plan (FESLUP) for the period 2023-2050. SEA is a systematic, on-going process for evaluating (at the earliest possible stage) the quantity and consequences of implementing certain plans and programmes on the environment. This SEA Statement is the final stage of the SEA process, and it is required under the European Communities Regulations 2004<sup>1</sup> (EU SEA Regulations) and national legislation<sup>2</sup> (SEA Regulations).

The purpose of the SEA Statement is to provide information on the decision-making process, and to document environmental considerations, the views of stakeholders and outline how recommendations arising from the SEA have been taken into account in the Plan. The four key requirements of this SEA Statement are to highlight:

- The incorporation of environmental considerations;
- Stakeholder involvement;
- Alterations considered; and
- Monitoring.

The SEA Statement is chronological in nature and includes the following:

- An outline of the methodology for undertaking a SEA;
- Scoping - an overview of the scoping process and summary of how the submissions received from stakeholders have been taken into account;
- Environmental Assessment - description of how environmental considerations have been integrated into the SEA;
- Alternatives - an outline of the reasons for choosing the plan to be adopted, in light of the other reasonable alternatives considered;
- Monitoring - an overview of the measures to monitor the plan going forward; and
- Final Appraisal - evaluation of the effectiveness of the SEA.

This SEA Statement will accompany the adopted FESLUP and be made available to the public.

## 1.2 Coillte's Forest Estate Strategic Land Use Plan (FESLUP) 2023-2050

The purpose of the FESLUP is to support the implementation of Coillte's Strategic Vision by setting out a framework for the delivery of Coillte's ambitions to 2050. The FESLUP 2023-2050 has been prepared by Arup, in cooperation with Coillte and sets out the objectives for Coillte's forest estate over the period 2023-2050 to aid the realisation of their eleven high-level ambitions.

Upon successful delivery, Coillte's Strategic Vision and, by extension, the FESLUP, will deliver multiple benefits of Coillte's forests, bring more focus to climate action and set ambitious new targets on biodiversity and recreation, all whilst continuing to deliver for the forest and wood products industry.

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<sup>1</sup> European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations, as amended by European Communities (Environmental Assessment of Certain Plans and Programmes) (Amendment) Regulations 2004

<sup>2</sup> Planning and Development (Strategic Environmental Assessment) Regulations, as amended by the Planning and Development (Strategic Environmental Assessment) (Amendment) Regulations



The achievement of the FESLUP will be guided by the balancing of multiple benefits of forests through the pillars of Forests for Nature, Forests for Climate, Forests for Wood and Forests for People.

Each of these pillars are described briefly as follows, and a number of ambitions were also set out for each pillar.

- **Forests for Climate** relates to the role our forest estate plays in the sinking and storing of carbon, and its potential to substitute carbon intensive products with wood products.

Climate ambitions include:

- *Enable the creation of 100,000 hectares of new forests, half of which will be native woodlands, which will sink 18m tonnes CO<sub>2</sub> by 2050.*
- *Manage the existing Forest Estate to increase the carbon store by 10m tonnes of CO<sub>2</sub> by 2050.*
- *Redesign 30,000 hectares of Peatland Forests for climate and ecological benefits by 2050.*
- *Generate an additional 1 Gigawatt of renewable wind energy to power 500,000 homes by 2050.*

**Forest for Nature** covers the existing biodiversity value of our forest estate and identify options to protect, enhance and restore the biodiversity value in these areas, in addition to extending the area of the estate managed primarily for biodiversity.

Nature ambitions include:

- *Enhance and restore biodiversity by increasing the area of our estate managed primarily for nature from 20% to 30% by 2025.*
- *Transform areas of our forests so that 50 % of our estate is managed primarily for Nature in the long-term.*

**Forests for Wood** covers the commercial aspects of Coillte's business which largely relates to timber production.

Wood ambitions include:

- *Produce 25m cubic metres of certified Irish timber, to support the construction of 300,000 homes by 2030.*
  - *Promote the use and benefits of wood products to increase the level of timber homes from 20% to 80% by 2050.*
- **Forests for People** covers the social and recreational aspects of Coillte's business.

People ambitions include:

*Enable the investment of €100 million in world-class Visitor Destinations to support growth in tourism and recreation by 2030.*

*Double the number of Recreation Areas to 500, to benefit local communities and people's wellbeing. Create 1,200 new jobs in rural communities to support the just transition to a low carbon economy.*

The Plan area with which the FESLUP will concern is displayed in **Figure 1**. The relationship between Coillte's Strategic Vision, Forest Estate Strategic Land Use Plan and Forest Estate Strategic Implementation Plans is outlined in **Figure 2**.

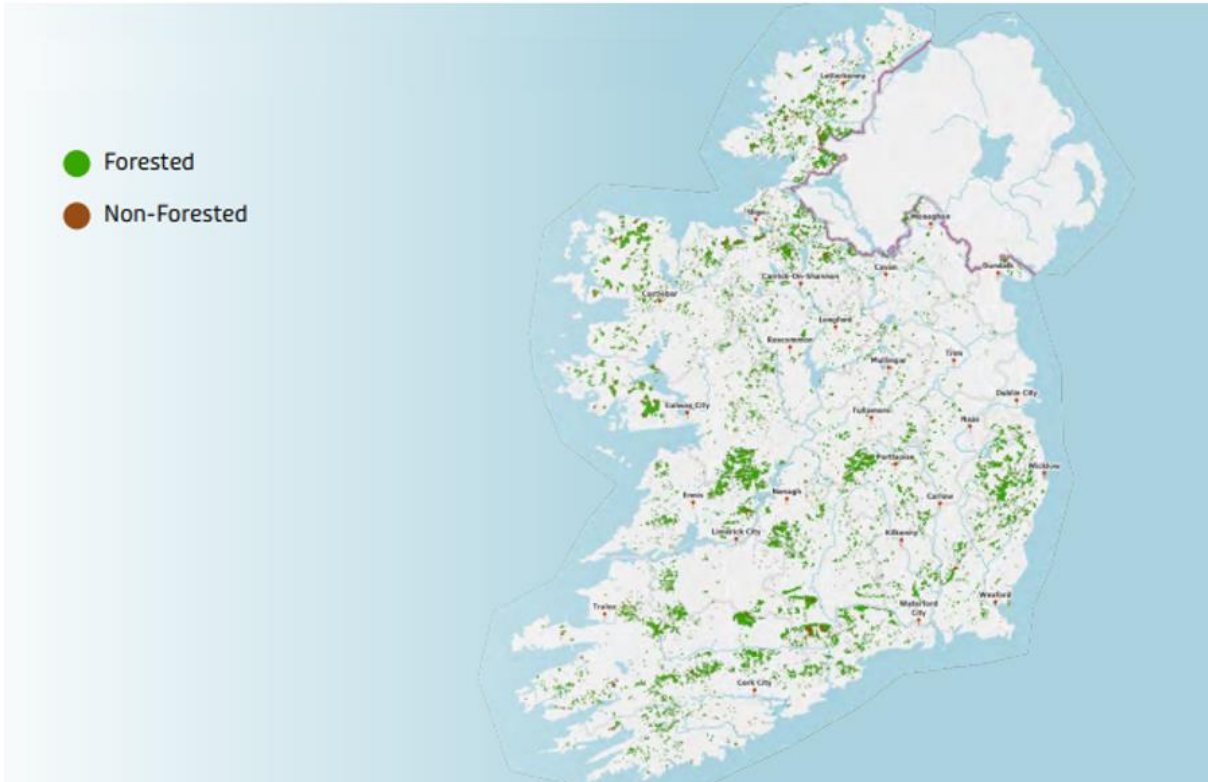


Figure 1 Map showing Coillte's Forest Estate



Figure 2 Relationship between Coillte's Strategic Vision, FESLUP and Forest Estate Strategic Implementation Plans

### 1.3 Timing of the SEA

The preparation of the FESLUP and SEA process were carried out in parallel to ensure that environmental considerations were taken into account into the plan making process.

The timeline for these steps is set out in Table 1.1.

**Table 1.1 Timeline of the FESLUP and SEA iterative process**

<b>Implementation Plan for the Forest Strategy 2023-2030</b>	<b>SEA</b>
Preparation of FESLUP	Commencement of SEA Scoping Consultation: <b>2<sup>nd</sup> June 2023</b>
Consultation on FESLUP: <b>14<sup>th</sup> September 2023 – 26<sup>th</sup> October 2023</b>	Consultation on SEA Environmental Report and AA Screening and Natura Impact Statement (NIS): <b>14<sup>th</sup> September 2023 – 26<sup>th</sup> October 2023</b>
Publication of FESLUP and SEA Statement: <b>Mid-December 2023</b>	

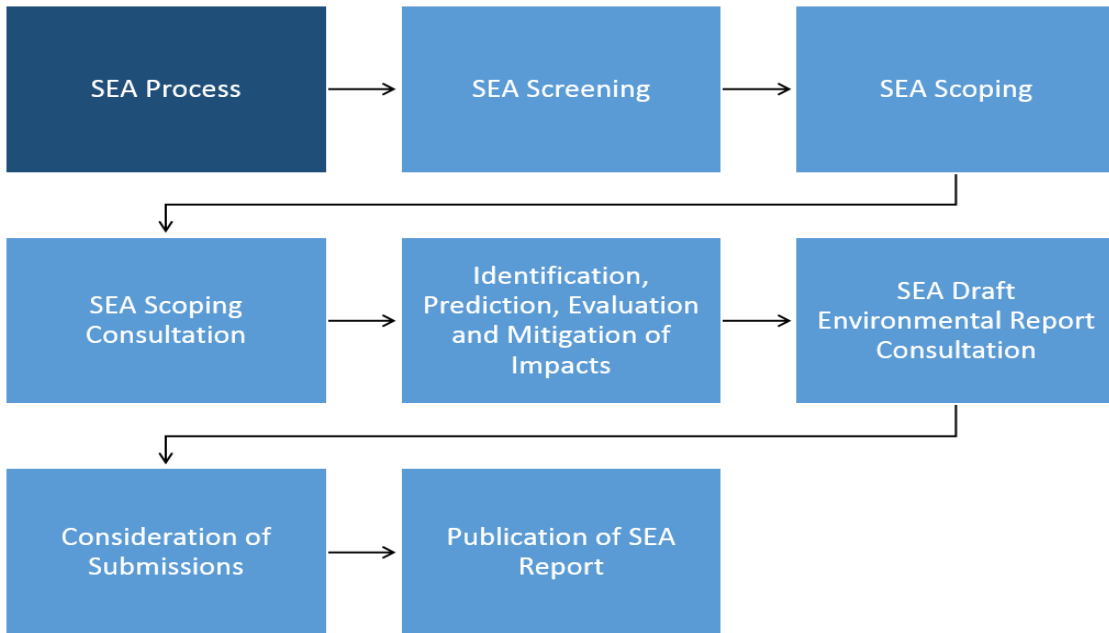
Section 4 of this SEA Statement provides a description as to how environmental considerations were incorporated into the plan making process.

## 2. SEA Methodology

### 2.1 Overview

This section highlights how the SEA was undertaken for the FESLUP. The SEA methodology is based on legislative requirements and relevant Environmental Protection Agency (EPA) guidance and will ensure compliance with the SEA Directive and associated legislation. The EPA’s SEA Pack (Version 18/02/2020) was also used as a source of information during the scoping process.

The FESLUP (Arup and Coillte), the SEA Environmental Report and the Appropriate Assessment (Arup) were prepared in an iterative manner whereby multiple revisions of each document were prepared, each informing subsequent iterations of the others. To facilitate this iterative approach, numerous discussions were held between Coillte and Arup. The key stages outlined in Figure 3 were identified and are discussed in the following sections.



**Figure 3 Key Stages of the SEA Process**

## 2.2 Screening

Screening is the process for deciding whether a particular Plan would warrant SEA at the earliest possible opportunity, it also facilitates the assessment findings so that they can be factored into the Plan development process. A screening assessment was undertaken as part of this SEA process to determine if the FESLUP required a SEA.

The SEA screening assessment of the FESLUP concluded that the FESLUP is of a type of Plan/Programme (P/P) which falls within the remit of the SEA Directive/SEA Regulations. Further, the FESLUP is prepared by a national authority and is considered a P/P that is required by legislative provisions. The FESLUP is not considered to be exempt, and it is a P/P prepared for forestry and land-use sectors, that has the potential to set a framework for the development consent for projects listed in the EIA Directive. Thus, the FESLUP required mandatory SEA.

Ultimately, it was determined that the FESLUP is considered a type of P/P which falls within the remit of the SEA Directive, and that it required mandatory SEA, based on findings outlined within the Applicability Stage (Stage 1 of the SEA Screening process which determined the applicability of SEA to the P/P-maker and P/P and/or where relevant to confirm if mandatory SEA is required). The FESLUP was therefore taken forward to SEA Scoping.

## 2.3 Scoping

### 2.3.1 Scoping Process

Scoping is the process for establishing the range of environmental issues to be covered in the SEA and the level of detail that the assessment will investigate. Scoping also allows input from the environmental authorities and stakeholders to be incorporated. Essentially, responses submitted as part of the scoping process provide greater focus on the evolution of the adopted FESLUP.

The considerations addressed in the scoping of the FESLUP were as follows:

- The key elements of the FESLUP to be assessed;
- The environmental aspects to be assessed as part of the SEA;
- Identification of relevant international, national and local plans, objectives and environmental standards that may influence or impact on the FESLUP;

- Development of Environmental Objectives, Indicators and Targets to allow the evaluation of impacts as part of the SEA; and
- Identification of any reasonable alternative means or scenarios for achieving the strategic goals of the FESLUP.

The SEA Scoping was a key part of the assessment process as it set out the extent of the SEA and provided information to allow consultation with defined statutory bodies and environmental authorities on the scope and level of detail to be considered and incorporated at an early stage in the assessment.

### 2.3.2 Scoping Consultation

The Scoping Report was issued for comment by defined statutory bodies and environmental authorities on 2<sup>nd</sup> June 2023. The statutory consultees were given a period of four weeks to respond with any observations or submissions on the content of the SEA Scoping Report.

The Scoping Report summarised the key environmental issues and outlined relevant plans and programmes that were likely to affect or be affected by the FESLUP.

This information was then used to set out a series of SEA Objectives, Indicators, and associated Targets. The Objectives and Targets established aims and thresholds which would be taken into consideration to effectively assess the impact of the FESLUP on the environment. Indicators are used to track the achievements of Objectives and Targets, describe the baseline situation, monitor the impact on the environment and predict impacts.

### 2.3.3 Scoping Responses

Six submissions were received in response to the SEA Scoping Report, from the Environmental Protection Agency (EPA), the Department of the Environment, Climate and Communications (DECC), Geological Survey Ireland (GSI), the Department for Communities – Historic Environment Division (HED), the Department of Agriculture, Environment and Rural Affairs (DAERA) – Northern Ireland Environment Agency (NIEA) – SEA Team, and the Department of Housing, Local Government and Heritage (DHLGH) – Development Applications Unit (DAU). All comments, observations and submissions contained therein were considered and incorporated into the assessment process, as considered relevant. Appendix A.1 of this report contains a summary of the submissions received on the SEA Scoping Report and how they were responded to.

The SEA Directive requires that where the FESLUP has potential for transboundary environmental effects these must be addressed within the SEA. In accordance with SEA Directive and EPA Guidance, the relevant statutory consultee in Northern Ireland was also contacted during the Scoping consultation period.

## 2.4 Baseline Assessment

Gathering relevant information that describes the current environment within the FESLUP area is an integral part of the SEA process. The SEA Directive requires that certain information on the existing environment is presented to help assess the implementation of Coillte's FESLUP, as well as helping establish how the environment would change if the FESLUP is not implemented.

Baseline information has been collected from readily available sources, and a Geographical Information System (GIS) was used to graphically present and analyse relevant information. The baseline of the Plan area, i.e., the area to which the adopted FESLUP applies, is reported in Section 5 of the Environmental Report ('Current State of the Environment'). The findings of EPA Ireland's National Inventory Report 2022 (EPA, 2022), EPA Water Quality in Ireland 2016-2021 (EPA, 2022) and the 2020 State of the Environment Report (EPA, 2020) were integrated into the SEA Environmental Report, amongst a large amount of forestry documentation, including but not limited to, Forestry Statistics 2022 (DAFM, 2022) and DAFM's 2022 Ireland's National Forest Inventory (DAFM, 2022).



## 2.5 Environmental Assessment

### 2.5.1 Overview

The environmental assessment ran in parallel to the development of the FESLUP. The environmental assessment process was undertaken in accordance with best practice SEA principals and guidance.

The environmental assessment comprised a review of the baseline data, identification of likely impacts and development of appropriate mitigation measures for the FESLUP.

An appraisal matrix was developed to facilitate the assessment of the objectives outlined in the FESLUP.

The matrix led assessment provided a holistic, integrated, and interactive approach to the formation of the objectives in the adopted FESLUP. The assessment also considered the findings of the AA.

A number of iterations of this assessment matrix were undertaken, between the SEA/AA Team and Coillte - refer to Section 2.5.4 and Section 2.5.5.

### 2.5.2 Objectives, Indicators and Targets

The objectives, indicators and targets are the aspects for which the FESLUP is assessed against. The objectives within the FESLUP are assessed against a range of environmental objectives and targets established for the purpose of the SEA. Further, indicators that are recommended in the SEA are utilised over the lifetime of the FESLUP to quantify the level of impact that the proposed plan may have on the environment.

A range of SEA Objectives, Indicators and Targets were recorded in the SEA ER which went out for public consultation from the 14th September 2023 until 26th October 2023. Following review of submissions, some updates were made to the same, and the final SEA ER has been updated to incorporate these changes.

A summary of the final Objectives, Indicators and Targets is included in Table 2.1.

**Table 2.1 Summary of Objectives, Indicators and Targets**

Environmental Component	Objectives	Targets	SEA Indicators
Population and Human Health	<p><b>Environmental Protection Objective (EPO):</b>  <b>Protect, enhance, and improve human health and wellbeing.</b></p> <p>Coillte aim to ensure the following is carried out with respect to Population and Human Health:</p> <p>Protect, enhance and improve human health and wellbeing.</p> <p>To ensure forest operations are carried out safely.</p> <p>Contribute to the well-being of workers and local populations.</p> <p>Provision of green spaces for amenity and recreational uses.</p> <p>Promote economic growth.</p> <p>Support forest owners and or managers to sustainably and effectively manage their plantations.</p>	<p>Minimisation and mitigation of health and safety incidents among forest workers.</p> <p>Increase number of green spaces, amenities, walking and or cycling routes, where appropriate, through forests areas for the public, particularly in line with Coillte’s Strategic Vision and its Forests for People pillar.</p> <p>Implementing the FESLUP to contribute to and facilitate towards economic growth.</p> <p>Increased number of people working across Coillte’s estate.</p>	<p>Number of health and safety incidents among forest workers.</p> <p>Number of people utilising Coillte’s estate for amenity and recreational purposes.</p> <p>Economic growth statistics for individuals working across Coillte’s estate.</p> <p>Achievement of Coillte’s Forests for People pillar outlined in Coillte’s Strategic Vision.</p> <p>Number of individuals employed directly and indirectly as a result of activity on or arising from the Coillte estate.</p>
Biodiversity (including Flora and Fauna)	<p><b>EPO:</b>  <b>Support achievement of the conservation objectives and requirements of the Birds and Habitat Directives, and other sites of nature conservation value.</b></p> <p>Coillte proposes to take the following measures with respect to biodiversity:</p> <p>To achieve the conservation objectives of European Sites (SACs and SPAs) and other sites of nature conservation.</p> <p>Preserve, protect, maintain, restore and, where appropriate, enhance or restore the terrestrial,</p>	<p>No loss of protected<sup>4</sup> habitats and species during the lifetime of the Plan, seeking to maintain and restore status of European sites where possible.</p> <p>Maintenance of favourable conservation status for all habitats and species protected under the Habitat Directive.</p> <p>Ensuring any forest management practises, including felling, afforestation, reforestation, maintenance, and any construction of new forest roads do not impact negatively on biodiversity and are subject to appropriate environmental assessments. Particularly where they may affect European Sites.</p> <p>Siting of forestry related development and or infrastructure installation, including wind energy developments on non-sensitive sites<sup>5</sup>.</p> <p>Biodiversity, ecosystem services and forestry are integrated into all decision making across the Plan and within development plans,</p>	<p>Number and condition of Natura 2000 network, European sites in proximity to or on Coillte’s estate, as per Article 17 Reports, and the maintenance of conservation objectives.</p> <p>Status of Annex 1 forest habitats and species as per Article 17 Reports.</p> <p>Achievement of favourable conservation status of designated sites.</p> <p>Area of new forest creation across Coillte’s estate.</p> <p>Area of new infrastructure development across Coillte’s estate.</p> <p>Achievement of the Objectives of the National Biodiversity Action Plan.</p>

<sup>4</sup> Protected refers to any habitats and or species protected under the EU Directive on the Conservation of Habitats, Flora and Fauna (92/43/EEC), commonly known as “the Habitats Directive” and Article 17 Reports.

<sup>5</sup> Sensitive areas are defined as ‘areas of a country where special measures may be given to protect the natural habitats which present a high level of vulnerability’ (EEA, 2000).

Environmental Component	Objectives	Targets	SEA Indicators
	<p>aquatic<sup>3</sup> and soil biodiversity, particularly EU designated sites. Ensuring no adverse effects on the integrity of any European site, with regard to its qualifying interests, associated conservation status, structure and function.</p> <p>Conserve and protect other sites of nature conservation including NHAs, pNHAs, National Parks, Nature Reserves, Wildfowl Sanctuaries as well as protected and threatened species outside these areas.</p> <p>Conserve sustainable populations of native animals and plants in line with the Habitats and Birds Directives e.g., (but not limited to) Curlew, Waders, Hen Harrier, Fresh Water Pearl Mussel.</p> <p>Safeguard national, regional and local designated sites and supporting features related to areas of forestry which function as stepping stones for migration, dispersal and genetic exchange of wild species.</p> <p>Enhance biodiversity of forest areas and ecosystems in line with the National Biodiversity Plan and its targets.</p> <p>Preserve genetic resources of forests long term.</p> <p>To protect, maintain and conserve biodiversity and natural capital of forest areas.</p> <p>To develop metrics, set targets and develop an effective regime to monitor and report on the ecological benefits of biodiversity management actions across Coillte's estate.</p> <p>Protect, conserve, enhance where possible and avoid loss of diversity and integrity of the broad range of habitats, species and wildlife corridors within forests.</p> <p>Ensure forest operations do not damage forests.</p>	<p>internal guidance documents, planning application considerations, and Department-led projects.</p> <p>An increase in biodiversity in line with the 4th National Biodiversity Action Plan and Coillte's Strategic Vision, particularly with reference to Coillte's Forests for Nature pillar – restoration, biodiversity management and expansion of native woodland.</p> <p>Reduced incidents of eutrophication/ water pollution, sediment loss.</p> <p>Reduced number of forest fires.</p> <p>No loss of forest health and vitality as a result of forestry operations.</p> <p>Implementation of appropriate biosecurity measures to aim to protect and conserve Irish native species.</p> <p>Identify invasive species in Irish forest and non-forest areas and develop appropriate management techniques for their control and spread.</p> <p>Reduced prevalence of tree disease and maintenance of tree health and control/manage/eradicate invasive species.</p> <p>Avoid aggravating adverse impacts on deer populations and woodland areas arising from deer fencing and other deer management approaches (in line with the Deer Management in Ireland Framework for Action) e.g., promoting the benefits of sustainable deer management.</p>	<p>Achievement of Coillte's Forest for Nature pillar outlined in Coillte's Strategic Vision.</p> <p>Status of protected Freshwater Species on or related to the Coillte estate.</p> <p>Status of protected Bird Species – BOCCI on or related to the Coillte estate.</p> <p>Area damaged by forest fires.</p> <p>Number of incident responses e.g., following flooding, fire, invasive species occurrence, deer incidents etc.</p>

<sup>3</sup> Aquatic refers to marine and riverine aquatic biodiversity.

Environmental Component	Objectives	Targets	SEA Indicators
	<p>Maintain forest health and vitality through protection against pests and diseases and, where possible, eliminate threats to biodiversity.</p> <p>Support sustainable deer management.</p> <p>Support a policy of biodiversity net gain.</p>		
Land and Soils	<p><b>EPO:</b> <b>Protect and enhance soil quality, function, and fertility.</b></p> <p>Coillte aim to ensure the following is carried out with respect to Land and Soils:</p> <p>Protect high quality and sensitive soils against pollution, erosion and acidification and prevent degradation of the soil resource.</p> <p>Achieve good soil fertility.</p> <p>Minimise the off-site impact of forest operations on the environment, sensitive habitats and soils.</p> <p>Increase the level of afforestation and reforestation in appropriate locations.</p> <p>Conserve, protect and avoid loss of integrity of designated geological features.</p> <p>Protect and enhance geodiversity features and geomorphological processes.</p> <p>Maintain and improve soil stability.</p> <p>Help to prevent or reduce soil erosion, slope failure, and compaction in forest areas.</p> <p>Where appropriate, restore peatland habitats in order to sequester and store carbon reduce emissions.</p>	<p>Protect and enhance soil quality, function, and fertility.</p> <p>Avoid soil contamination as a result of forest management practises or construction of forest roads.</p> <p>To achieve annual afforestation and reforestation targets, in appropriate locations.</p> <p>To reduce level of illegal deforestation or tree felling. Illegal deforestation consists of tree removal that is not required and or permitted for development or habitat restoration during the lifetime of the Plan.</p> <p>Limited and controlled forestry developments.</p> <p>To adopt appropriate environmental protection procedures during all construction and maintenance works on site for forestry developments and operations and potential wind energy developments and operations.</p> <p>To restore further areas of peatland habitat across Coillte’s forest estate.</p>	<p>Number and condition of designated geological features within Coillte estate.</p> <p>Incidences of pollution events related to activities on Coillte’s estate.</p> <p>Concentrations of nitrogen dioxide, sulphur dioxide and ammonia in proximity to Coillte’s estate that may give rise to nitrogen deposition and acidification of soils.</p> <p>Number of hectares forested annually by Coillte and number of tree-felling licences granted to Coillte.</p> <p>Area of Coillte estate subject to illegal deforestation.</p> <p>Rates of forestry creation, forestry related developments and or wind energy developments e.g., forest roads, wind turbines and construction, where permitted and appropriate across Coillte’s estate.</p> <p>Area of peatland restored across Coillte’s estate.</p>
Water	<p><b>EPO:</b> <b>Support achievement of the objectives of the Water Framework Directive.</b></p> <p>Coillte aim to carry out the following with respect of water:</p> <p>Ensure that the status of water bodies are protected, restored and no deterioration will be seen in line with the objectives of the Water Framework</p>	<p>All waters within the Plan area to achieve the objectives of the Water Framework Directive and the relevant River Basin Management Plan by 2027.</p> <p>Achieve compliance with Groundwater Quality Standards and Threshold Values under Directive 2006/118/EC (protection of groundwater).</p> <p>Improvement or at least no deterioration in surface and ground waters. Avoid declines in surface water and groundwater quality and quantity as a result of forestry-related activity.</p>	<p>Proportion of water bodies in Coillte forestry catchments meeting their WFD Ecological Status objectives, as reported by the EPA Water Monitoring Programme for the WFD.</p> <p>Status of aquatic habitats and species on the Coillte estate.</p> <p>Number of significant pollution events recorded arising from Coillte activity.</p>



Environmental Component	Objectives	Targets	SEA Indicators
	<p>Directive and Marine Strategy Framework Directive.</p> <p>Improve and or maintain water quality and the management of watercourses to comply with the standards of the Water Framework Directive and incorporate the objectives of the Floods Directive into sustainable development.</p> <p>Reduce the impact of polluting substances from forestry operations and developments to all waters and prevent pollution and contamination of ground water by adhering to aquifer protection plans.</p> <p>Reduce incidences of sedimentation and eutrophication and address existing and ongoing sedimentation or hydrological issues.</p> <p>Avoid inappropriate development in areas at risk of flooding and areas that are vulnerable to current and future erosion.</p> <p>Protect flood plains and areas of flood risk from forestry development through avoidance, mitigation and adaptation measures, as appropriate.</p> <p>Improve catchment hydrology in the Plan area to reduce flooding.</p>	<p>Minimise flood risk through appropriate management of flood vulnerable zones. Support flood prevention measures, where appropriate.</p> <p>Promote sustainable drainage practices to improve water quality and flow in and around forest areas.</p> <p>Improve status and quality of catchment areas in and around forest areas.</p>	<p>The area of land assigned to permanent water setback across Coillte's estate.</p>
<p>Air and Climate (including Noise)</p>	<p><b>EPOs:</b></p> <p><b>Continue to comply with air quality standards to prevent or reduce harmful effects on human health and the environment; and</b></p> <p><b>Seek to reduce Coillte's greenhouse gas emission to help in achieving Ireland's net zero commitments by 2050.</b></p> <p>Coillte aim to carry out the following with respect of air quality and climate:</p> <p>To avoid, prevent or reduce harmful effects on human health and the environment as a whole resulting from emissions to air from transport and forestry related activities including wood burning (biomass/renewable).</p>	<p>Improvement in Air Quality trends, particularly in relation to transport related emissions of NOx and particulate matter from Coillte's forestry transport and operations.</p> <p>Maintain ambient air quality through reduction of private vehicle usage for forestry operations, amongst promoting the electrification of forestry transport fleets, use of biofuels etc.</p> <p>Meeting and improving Air Quality Standards for human health and vegetation, and reduction in nitrogen deposition.</p> <p>Contribute towards the target of aggregate reduction in carbon dioxide (CO2) emissions in accordance with the Climate Action Plan.</p> <p>Maintain and enhance the carbon sequestration of forest ecosystems in line with Coillte's Strategic Vision, particularly its Forest for Climate pillar.</p>	<p>Coillte's forestry related traffic, transport and vehicular survey data.</p> <p>Area of forest cover across Coillte's estate.</p> <p>Annual afforestation, reforestation, restoration and rewilding targets for Coillte's forest estate and achievement of Coillte's Forests for Climate pillar outlined in Coillte's Strategic Vision.</p> <p>GHG emission reductions over the Plan period on or related to Coillte's estate and the achievement of Coillte's Forests for Climate pillar outlined in Coillte's Strategic Vision</p> <p>Noise monitoring data from licensed forestry operations.</p>

Environmental Component	Objectives	Targets	SEA Indicators
	<p>Meet Air Quality standards for the protection of human health and vegetation and move towards compliance with WHO guidelines.</p> <p>Reduction of emissions of sulphur dioxide, nitrogen oxides, volatile organic compounds, ammonia and fine particulate matter which are responsible for acidification, eutrophication and ground-level ozone pollution.</p> <p>Contribute towards the reduction of greenhouse gas emissions in line with national targets.</p> <p>Adaptation to climate change.</p> <p>Achieve Irish and EU reduction in emissions of greenhouse gases.</p> <p>Integrate sustainable design solutions into infrastructure.</p> <p>Minimise emissions of greenhouse gases and contribute to a reduction and avoidance of human-induced global climate change.</p> <p>Reduce forestry related transport operations within the Plan area by way of an integrated approach to sustainable transport.</p> <p>Decrease noise and air pollution for forestry operations and move closer to WHO recommended levels.</p>	<p>Achievement of Irish / EU GHG emission reduction targets.</p> <p>Increase in renewable energy use in Ireland, particularly increasing the potential for low carbon technology to support forestry activities.</p> <p>Increased uptake in appropriately sited renewable energy projects on or related to Coillte's estate.</p> <p>Increase the facilitation of timber use throughout the construction sector.</p> <p>Contribute towards transition to a competitive, low-carbon, climate-resilient and environmentally sustainable economy by 2050.</p> <p>To achieve a 51% reduction on GHG emission levels (compared with 2018 levels) by 2030 and achievement of Coillte's Strategic Vision, particularly its Forest for Climate pillar.</p> <p>Contribute towards the target of the Renewable Energy Directive (2009/28/EC), for all Member States.</p> <p>Minimise noise and emissions during construction and operation of new forestry related developments.</p>	<p>Onsite dust monitoring of forestry operations.</p>
<p>Archaeological, Architectural and Cultural Heritage</p>	<p><b>EPO:</b>  <b>Protect, conserve, and enhance the cultural heritage and historic environment.</b></p> <p>Coillte aim to carry out the following with respect of archaeological, architectural and cultural heritage:  To protect, conserve and where possible enhance the cultural heritage including the historic environment and settings; archaeological recorded and unrecorded monuments, architectural (Protected Structures, Architectural Conservation Areas, vernacular buildings, materials, and urban fabric) and manmade landscape features (e.g., field walls, footpaths, gate piers etc.) within and surrounding Coillte's forest estate.</p>	<p>Protect entries to the Record of Monuments and Places, and the immediate setting of these entries including relationships with the surrounding landscape where relevant, from adverse effects resulting from potential development resulting from the FESLUP; and where archaeological sites or monuments (or portions of such) have to be removed due to development the approach of preservation by record is applied.</p> <p>More generally ensure permitted developments, where possible, avoid impacts on cultural heritage, including Protected Structures, Architectural Conservation Areas and other significant landscape features; and protect the amenities of such structures, and features.</p> <p>Avoid direct impacts for forestry operations on heritage assets, including archaeological sites and monuments.</p> <p>Avoid adverse impacts on historic landscapes.</p>	<p>Number of entries to the Record of Monuments and Places, and the immediate setting of these entries including their relationships with Coillte's forestry projects, forest areas and the surrounding landscape.</p> <p>Full or partial loss to entries to the RPSs/NIAs across Coillte's estate.</p> <p>Results of Archaeological Impact Assessments and or archaeological investigations undertaken, related to forest creation and or development.</p> <p>Number of uninhabited and derelict structures across Coillte's estate.</p>

Environmental Component	Objectives	Targets	SEA Indicators
	<p>Increase understanding and awareness of woodland-related natural and cultural heritage.</p> <p>To ensure the restoration and re-use of existing uninhabited and derelict structures where possible opposed to demolition and new build (to promote sustainability and reduce landfill).</p>	<p>Protect and enhance areas of ancient and semi-natural woodland.</p> <p>Maintenance and enhancement of archaeological heritage- including entries to the Record of Monuments and Places and unknown archaeology- and the context of the above within the surrounding landscape where relevant.</p> <p>To increase the number of uninhabited and derelict structures that are restored opposed to demolition.</p>	
Landscape and Visual	<p><b>EPO:</b></p> <p><b>Conserve, protect and enhance valued natural, cultural and built landscapes, seascape, views of local value and features.</b></p> <p>Coillte aim to carry out the following with respect Landscape and Visual:</p> <p>To implement the identification, assessment, protection, management and planning of landscapes having regard to the European Landscape Convention, where forest creation and or development are permitted.</p> <p>Conserve, protect and enhance valued natural, cultural and built landscapes, seascape, views of local value and features including those of geological and aesthetic value, in relation to forest creation and or development.</p> <p>Maintain and enhance landscape quality within the Plan area by minimising visual impacts through appropriate forest design, assessment and siting.</p> <p>Contribute to scenic value, including distinctiveness and diversity of landscapes in the Plan area.</p> <p>Conserve, protect and enhance valued natural, cultural and built landscapes, views of local value and features including those of geological and aesthetic value, in relation to increased wind development.</p>	<p>Minimise afforestation and or development which will result in avoidable adverse visual impacts on the landscape, in so far as possible.</p> <p>Ensure forestry development and or creation is sensitive to its surroundings.</p> <p>Minimise visual impacts to landscape in so far as possible, as a result of forestry operation, creation and or developments.</p> <p>Improve protection for landscapes of recognised quality and protected views.</p> <p>Improve degraded landscapes across Ireland.</p> <p>Enhance provision of, and access to, green space in forest areas, where appropriate.</p> <p>Ensure no significant disruption of historic and or cultural landscapes and features through objectives of the Plan.</p> <p>Ensure wind development is sensitive to its surroundings.</p>	<p>Rates of Coillte's forestry development within designated landscapes.</p> <p>Rates of Coillte's forest developments and planting.</p> <p>Number and scale of wind developments across Coillte's estate.</p>
Material Assets	<p><b>EPOs:</b></p> <p><b>To promote the effective and sustainable use of forest products; and</b></p>	<p>Continuation of or increased economic growth from the export of forest products that are efficient and cost effective and achievement of Coillte's Strategic Vision and its Forest for Wood pillar.</p>	<p>Statistics on the quantity of forest products produced (and exported) and achievement of Coillte's Forests for Wood pillar outlined in Coillte's Strategic Vision.</p>

Environmental Component	Objectives	Targets	SEA Indicators
	<p><b>Make best use of existing infrastructure and promote the sustainable development of new infrastructure.</b></p> <p>Coillte aim to carry out the following with respect of Material Assets:</p> <p>To promote the effective and sustainable use of forest products e.g., biomass use for energy.</p> <p>To promote the effective and sustainable use of forest products e.g., timber use within the construction sector.</p> <p>Provide productive employment within the forestry sector.</p> <p>Contribute to the viability of rural communities.</p> <p>Make best use of existing infrastructure and promote the sustainable development of new infrastructure related to the FESLUP or Coillte's forest estate, where appropriate.</p> <p>Integrate forestry with other land uses, including minerals agriculture and energy.</p> <p>Implement the waste hierarchy and encourage reuse/recycling of forestry related waste disposal and materials wherever possible.</p> <p>To support and encourage future wind energy developments in order to reduce reliance on fossil fuels and aid the achievement of Ireland's climate targets, however, to ensure any such developments are located at appropriate locations.</p>	<p>Increase in renewable energy developments related to the forestry sector, particularly in line with Coillte's Strategic Vision and its Forests for Climate objectives.</p> <p>Increase local employment opportunities with increased forest operations and planting.</p> <p>Increased amount of forest products available for use e.g., forest biomass as a renewable energy source and or timber for construction.</p> <p>The sustainable management of forests to ensure continuity of supply.</p> <p>Improve efficiencies of forest transport, energy and communication infrastructure.</p> <p>Ensuring any potential wind energy developments, including construction, operation and maintenance do not impact negatively on biodiversity and are subject to appropriate environmental assessments. Particularly where they may affect European Sites.</p>	<p>Achievement of Ireland's renewable energy targets and increased use of biomass as a renewable energy source amongst, the achievement of Coillte's Forests for Climate pillar outlined in Coillte's Strategic Vision.</p> <p>Employment Statistics for the activities on or related to Coillte's estate.</p> <p>Amount of forest products available and the value of and or revenue of products.</p> <p>Amount of woody biomass used for renewable energy generation in Ireland annually.</p> <p>Location and/or level of forestry related infrastructure including forest roads across Coillte's estate.</p> <p>Location and/or size of renewable wind energy related infrastructure.</p>



## 2.5.3 Consideration of Alternatives

### 2.5.3.1 Introduction

As described in the SEA ER, a number of alternative FESLUP scenarios were considered and assessed as part of the SEA.

The alternative Plan scenarios considered and assessed as part of the SEA ER are summarised in Section 2.5.3.2.

### 2.5.3.2 Identification of Reasonable Alternatives

As described previously, the FESLUP provides a framework for delivery on the ambitions of Coillte's Strategic Vision. Both Coillte's Strategic Vision and the FESLUP are thus intrinsically linked, in that one gives rise to the other. Thus, it is appropriate to outline some of the potential alternatives considered to the ambitions within Coillte's Strategic Vision first, in order to fully understand how the FESLUP was developed, and ultimately how the objectives of the FESLUP were established.

In developing the Strategic Vision, and in consideration of the feedback received in both the public consultation and public attitudes survey (refer to Section 3.5 of the FESLUP for information on Public Feedback) undertaken during 2022 on Coillte's Strategic Vision, the following considerations on some of Coillte's Strategic Vision Ambitions are discussed.

It is worth noting that forests can deliver multiple values or objectives and have the capacity to provide a wide range of economic, environmental, and social benefits. The four forest objectives of Climate, Nature, Wood and People are intrinsically linked, as are many of the potential benefits. It is important however to acknowledge that maximising one objective has the potential to result in trade-offs with others. It may also not be realistic or appropriate to deliver all forest objectives equally in all forest locations. It is therefore critical that the right balance of objectives is achieved across the estate that best deliver on the multiple benefits of forests for climate, nature, wood, and people.

In developing the Strategic Vision, the following areas of consideration were taken into account and potential outcomes were assessed for each:

- Consideration given to primarily planting native or broadleaf species and increasing the area of the estate managed primarily for nature beyond 50%;
- Consideration given to limiting management and intervention of the forest estate for climate & nature benefits; and
- Consideration given to the scale of Afforestation Ambitions.

Once Coillte's Strategic Vision was developed, a range of further alternatives for how the high level of ambitions of Coillte's Strategic Vision would be delivered via the FESLUP were then considered, as described below. However, it is noted that not all ambitions are capable of being delivered in alternative ways.

#### Forests for Climate

Two alternative delivery scenarios were considered to realise the ambition to *"manage the existing Forest Estate to increase the carbon store by 10m tonnes of CO<sub>2</sub> by 2050."*:

- **Scenario A: 10m tonnes of CO<sub>2</sub> stored by 2050 delivered through no felling over Plan period.** This Scenario was designed to understand how the ambition of increasing the carbon store in Coillte's estate by 10m tonnes could be delivered through a set of landscape and silvicultural methods that were largely underpinned by no harvesting of the forest estate, i.e., no thinning or clear-felling.
  - While this scenario provided a large short-term increase in carbon storage, it clearly demonstrated that there would be a significant lack of certified, Irish timber available to the Irish market. In addition, the analysis of this scenario demonstrated the high risk of pests and diseases to an ageing, unmanaged forest.

As these risks spread across the estate, the emissions resulting from stressed and dying forests would result in large emissions in the medium and long-term. This latter outcome is consistent with what occurred in parts of central Europe and North America due to extensive outbreaks of spruce bark beetle.

- **Scenario B: 10m tonnes of CO2 stored by 2050 delivered through continued felling and replating over Plan period.** This Scenario was designed as a balanced model that would increase the carbon store in Irish forests by 10m tonnes by 2050 and achieved through the implementation of a range of silvicultural and landscape management options across the Coillte estate.
  - This scenario was designed to balance a number of objectives that includes climate, wood, nature and recreation. The principal mechanisms that were identified to achieve this increase in carbon storage, focussed on the active management of the forest estate (both coniferous and broadleaf estate) and a range of peatland redesign options.
  - The silvicultural management options that were implemented across the estate, have a particular emphasis on the extension of rotations in conifer crops, thinning and continuous cover forestry. In addition, this scenario sought to provide an even supply of timber to the market over the planned period.

Two alternative delivery scenarios were considered with regards the ambition to “*redesign 30,000 hectares of Peatland Forests for climate and ecological benefits by 2050.*”:

- **Scenario A: All 30,000 hectares of peatland is deforested and ‘re-wet’ in full.** This Scenario was designed to analyse the potential outcome of rewetting an area of 30,000 ha of peatland forests in the short-term. This scenario focussed exclusively on the deforestation of the 30,000 ha and then carrying out the appropriate on-site activities to rewet the peatland.
  - Analysis of this scenario demonstrated that in the short-term, there would be a large emission of CO<sub>2</sub> due to the deforestation of the stands and which would also coincide with a large emission of CH<sub>4</sub> due to the decomposition of woody material.
  - While rewetting can be considered beneficial from a biodiversity perspective, the rewetting process can have a negative impact due to the CO<sub>2</sub> emissions from deforestation and methane emissions.
  - In addition, it should be noted that there are also practical limitations associated with large-scale rewetting of peatland forests. This relates to the site suitability (i.e., locations may be limited due to topography and the extent of peatland decomposition).
- **Scenario B: A balanced portion of the 30,000 hectares of peatland is deforested and ‘re-wet’, with the remaining hectares re-established with site appropriate species.** This Scenario was designed as part of the development of a balanced model, which sought to redesign 30,000 hectares of peatland forests through a combination of redesign measures that included rewetting, rewilding/conversion to semi-natural woodland and in some cases retaining of existing areas.
  - This mix was identified as the most appropriate set of measures that would have the optimal climate benefit in the short-term (i.e., to 2050) and which could be implemented across the designated area. In addition, it was considered that there were also significant benefits to biodiversity and nature resulting from these redesign measures.

## Forests For Nature

Two alternative delivery scenarios were considered with regards the ambition to “*Enhance and restore biodiversity by increasing the area of our estate managed primarily for nature from 20% to 30% by 2025*”:

- **Scenario A: Focus on non-economic lands with lower economic cost to enhance and restore habitats of value for nature.** This Scenario reflects an approach that is based on economic assumptions. There is an assumption that lands that do not currently add significant value for the alternative pillars of Wood, Climate or People, present opportunities for enhancing their biodiversity value for nature. Further, that implementation of the actions or inputs required to enhance the value of these lands for nature would be lower and more cost-effective than elsewhere.

- Previous experience in habitat restoration projects have borne out the first assumption to some extent. It is certainly the case that some forests of low productivity from a forestry perspective have good current or potential value for nature. For example, this was observed in Coillte’s bog restoration LIFE projects of the 2000s. The afforested peatland sites with best restoration potential were often those forest stands where tree growth had been exceptionally poor.
  - On these sites the trees had grown so poorly, as the soil consisted of very deep peats and the water table had remained high, despite the presence of forest drains. As a result, open stands of stunted conifer trees had developed, with ground vegetation that included an abundant peatland flora. These sites responded well to bog restoration measures. Similar outcomes were observed in native forest restoration projects, on challenged sites that flourished when basic restoration measures were implemented.
  - However, when viewed alone and without ecological criteria, forest productivity is not a reliable indicator of the current or potential ecological value of forest habitats. Furthermore, the actions required to convert “non-economic lands” to valuable habitat may be resource-intensive and costly. If the potential ecological value of these lands, once actions have been implemented, remains poor, then the investment may not have been worth it.
- **Scenario B: Focus on land with higher ecological value to enhance and restore habitats increase of value for nature.** This Scenario reflects a more robust approach, from an ecological perspective. In this scenario, efforts are made to locate sites on the highest current or potential ecological value.
    - This scenario is an extension of the approach Coillte has invested in over the past 20 years, having engaged ecologists to assess forests and other habitats of potential biodiversity value. Many of the forests and other habitats on the Coillte estate can be considered “modified”, if viewed from the perspective of conventional ecological habitat classification systems or definitions. Yet, they have considerable value for nature.
    - Due to historical factors over thousands of years, the national forest cover in Ireland is low, and any kind of forest habitat can be viewed as uncommon, or even rare in some parts of the country. In this situation, plantation forests provide valuable habitat for forest-dwelling plants and animals. Coillte have developed a classification system, called BioClass, which consists of a set of indicators of forest biodiversity, based on scientific research in Irish plantation forests. The indicators are either natural values of the forest stand or biodiversity features, and the more of these that are present, the higher the biodiversity value.
    - This BioClass system enables Coillte to assess the current biodiversity value of any forest stand. Using this approach for the scenario, Coillte can focus biodiversity enhancement measures on the forests that are assessed to yield the best potential gain for biodiversity. Sometimes, these forests have other values for the other Vision pillars, and the actions required to enhance habitat value will need to be balanced with those other values. For open habitats, a similar set of criteria will be utilised, work is ongoing to refine this, particularly for modified peatlands, uplands and wetlands. Coillte plan to refine the approach by engaging with stakeholders and organisations that have developed expertise in identifying and restoring peatlands of ecological value.

Two alternative delivery scenarios were considered with regards the ambition to “*Transform areas of our forests so that 50% of our estate is managed primarily for Nature in the long term*”.

This ambition is focused on the additional 20% primarily for Nature on the forest estate, 30% of the estate having been identified in the previous ambition. Both scenarios are focused on pursuing areas that may not currently add significant value for wood, climate or people. The basic premise is that these lands will present opportunities for increasing the area available for habitats and species. It is recognised that, globally, nationally and locally, there is a need to create significantly more space for nature, providing places where habitats can develop naturally and species can flourish, complete their lifecycle and breed successfully.

- **Scenario A: Minimal intervention.** This Scenario reflects an approach where potential areas are left to develop naturally, and no significant management actions will be implemented.

- The assumption is that these areas will develop natural characteristics over time that may be highly valued, and in turn improve their habitat value for a range of species. This scenario represents the lowest level of Coillte operational intervention and is expected to be the lowest cost alternative for forest transformation. A primary challenge with this minimal intervention approach, is in relation to the encroachment of invasive species into the areas identified for nature, with the accompanying impact on the potential for habitat and species benefits. There is an associated risk for nature outside these areas as left unchecked there is potential for further detrimental spread of invasive species from these areas into adjoining open or forested areas.
- **Scenario B: Increased biodiversity management practices.** This Scenario reflects an approach in which Coillte proactively assess the current and potential habitat value of these lands, exploring management practices that will enhance their natural value over time.
  - In addition to the recognised peatland habitats, these additional areas for Nature are likely to also contain “modified” habitats. For the latter it is accepted that there may not currently be classification systems available now for describing these habitats or for assessing accurately their nature conservation value.
  - Given the scale and diversity of these lands, delivering this scenario will be a challenging exercise. Some areas of restoration for example peatland ‘rewetting’ will require significant levels of pre and post operational management and resourcing to undertake the successful delivery.
  - Utilising increased biodiversity management planning, it is anticipated that these areas will have considerable value for nature, given their extent. Within this scenario Coillte will develop a science-based, evidence-based approach to managing these lands, engaging with regulatory bodies and expert groups to explore the best approaches.

## Forests for Wood

Three alternative delivery scenarios were considered with regards the ambition to “*produce 25m cubic meters of certified Irish timber, to support the construction of 300,000 homes by 2030*”:

- **Scenario A: Continuation of the current harvesting production systems.** Continue current harvesting production operational processes. The current conifer harvesting production system delivers production of roundwood through accredited clearfelling (c.86.5%) and thinning operations (c.13%) and CCF (c.0.5%). Following clearfell all trees harvested during the rotation are replanted.
  - For timber production, the current thinning and clearfell operations and delivery of roundwood to roadside integrates seamlessly into the existing supply chain. The operations efficiently and cost effectively produce certified roundwood to meet the industrial expectations from Coillte managed forests.
- **Scenario B: Full Continuous Cover Forestry System (CCF) across the forest estate.** Move to full Continuous Cover Forestry (CCF) production system. Continuous cover forestry systems, offer the possibility to harvest a similar timber volume over the same period, in regular instalments and avoid the need to clearfell in the longer term. CCF is operated successfully in many regions of Europe, however the system is not yet widely practised or fully understood within Irish forestry growing conditions.
  - In regions practising CCF, there are recognised benefits including improving biodiversity within the overall forest ecosystem. CCF does require additional resources compared to conventional systems, including extra monitoring of the stand during pre and post harvesting activities, additional capital expenditure to facilitate potentially higher density roading requirements, however these are somewhat offset by reduced forest re-establishment costs.
  - Environmental conditions and site limitations (including wind exposure, soil type and species limitations) can inhibit stand stability and the occurrence of natural regeneration on some sites. These factors can significantly reduce the suitability of successful forest transition to a CCF system in some areas. Under CCF conditions average tree size is expected to increase, which may prove problematic to the sawmill processing sector in the short term and needs consideration, planning and perhaps investment at an industry level.



- Accurately forecasting future timber values is limited by the lack of growth and yield values, therefore future estimates are derived from applying scaled estimates from existing Thinning and Clearfell forest stand growth and yield models. Using these estimates and applying a CCF regime where appropriate, this scenario will only achieve c.48% of Coillte’s volume ambition for the period.
- **Scenario C: Incorporation of management changes required to deliver on Nature, People and Climate, namely the increase of stands being managed for CCF, stands transitioning from Conifer Forest and increasing length of forest rotations.**
  - This scenario was designed to balance Wood production with the ambitions for Climate, Nature and People to ensure a sufficient supply of certified timber. As outlined in the climate alternatives, changes to how the forest is managed impacts the carbon balance, this scenario meets the ambition to capture the additional 10m tonnes of carbon. Primarily this is achieved by extending the rotation age for stands and decreasing thinning levels, resulting in an increase of ‘in forest’ standing volume, and the capture of more carbon. However due to the age distribution of the forest, a reduction in the number of stands available to harvest in the near term will be evident and the proportion of volume derived from Clearfell will reduce to 82%.
  - Within the scenario therefore, the proportion of stands managed for CCF increases, with the associated CCF production volume rising from c.0.5% to c.6%. Additional CCF will predominantly occur in areas that are high value for the Nature and People pillars and will result in multiple benefit forest management. Increasing the overall volume contribution from CCF will broaden Coillte’s understanding of these systems and help develop the planning, monitoring systems, skills and experience required to successfully implement CCF and transition existing Clearfell stands.
  - The transition of some stands away from conifer to alternative future land use for the Nature and Climate pillars have also been incorporated into the modelling for this scenario. Within the plan period and beyond, this alternative future land use change will not result in any significant impact of available timber volumes from Coillte’s managed forests.

## Forests for People

Two alternative delivery scenarios were considered with regards the ambition to “Enable the investment of €100 million in world-class Visitor Destinations to support growth in tourism and recreation by 2030”:

- **Scenario A: Make land available for external Visitor Destination development.** The approach of making land available for external Visitor Destination development, purely from a commercial perspective is attractive, as it could be delivered with low levels of resource input and provides potential for high financial return.
  - The method of delivery associated with this scenario, however, provides a lack of operational control linked to key attributes of Coillte’s Strategic Vision for visitor destination development. As such, there are associated risks. Primarily that the prospective developer may not operate the destination to a high standard or that initial standards would decline over time, leading to a failed visitor destination experience and associated reputational damage. Further within the development itself, there is a risk that the developer would not adhere to equivalent sustainability and accessibility standards found at similar Coillte visitor destinations.
  - There are also opportunity costs associated with this scenario, as Coillte would not only lose the opportunity to enhance internal and partnership expertise in Visitor Destination development but also the related lack of brand association with World Class Forest destinations developed.
- **Scenario B: Carry out site selection and work with strategic partners to develop masterplans and subject sites to Coillte’s sustainability/accessibility policy.** Identify through set criteria, highly suitable locations, and the subsequent expert partnership led development of masterplans, ensuring any development aligns to Coillte’s sustainability and accessibility policies. This scenario is more time consuming and requires greater resourcing internally for Coillte, however it aligns better with Coillte’s Strategic Vision and ambitions and mitigates risks associated with Scenario A.
  - The use of master planning with public consultation, enables community involvement in the prospective sites, allowing public concerns and ideation to be fully considered and acted upon.

Utilising strategic partnerships and joint alignment of ambitions for recreation will boost the potential for delivery of world class destinations. It is envisaged that the development and operation of the facilities will be directed by Coillte, ensuring high quality standards from the initial delivery and into the future.

- This scenario also presents the opportunity for Coillte branding at the developed destinations, which has wider value for the organisation. Coillte’s association with these destinations provides great potential to educate the public about the Coillte mission and Coillte’s Strategic Vision for the core pillars of Climate, Nature, Wood and People.

#### 2.5.4 Assessment Stage 1

The first stage of the SEA assessment process comprised the first draft of the appraisal matrix that was completed by the SEA team. This was based on the initial draft of the FESLUP and provided to Coillte for their consideration.

This objectives-led assessment compared the likely impacts of each objective in the initial draft FESLUP against the strategic environmental objectives (as described in Section 2.5.2) with respect to the baseline information. Particular reference was made to the potential for cumulative effects in association with other relevant plan and programmes.

The assessment process categorised environmental impacts using the ratings outlined in Table 2.2 which is based on the impact assessment criteria defined by the EPA for environmental impact assessment.

**Table 2.2 Impact Ratings**

Significance of Impact	
	Positive
	Neutral
	Negative
	Uncertain

The assessment also considered the potential for cumulative effects of policies on each other to determine if certain policies working in combination could have an environmental impact.

Upon completion of the first appraisal matrix, a number of recommendations were made which were then reviewed in detail by Coillte and where appropriate, incorporated into the FESLUP, such as changes to wording of objectives.

#### 2.5.5 Assessment Stage 2 - Final Plan

The next stage of the assessment comprised the revision of the appraisal matrix to take on board comments received from Coillte on the initial draft FESLUP and the associated first draft appraisal matrix.

This appraisal matrix was incorporated into the SEA Environmental Report that accompanied the FESUP that was on public consultation from 14th September 2023 until 26th October. The principle environmental effects, as per the assessment matrix, identified are summarised below, relevant to the proposed objectives.

The objectives in the FESLUP were assessed with respect to the existing environmental baseline and the environmental objectives and targets. The assessment included in Section 8 of the SEA Environmental Report also took regard for transboundary effects of the FESLUP on Northern Ireland, particularly in relation to the air quality, climate, biodiversity, water and landscape and visual assessments, the potential for transboundary effects between the Republic of Ireland and Northern Ireland has been considered throughout the assessment process.

As the objectives included in the FESLUP have been designed to promote sustainable forest management, use of renewable energy developments, increased biodiversity areas and restoration areas, increased recreational areas, promotion of timber use across the construction sector and education across the forestry industry, the environmental assessment outcomes are generally positive, or neutral.

Matrices were prepared to identify potential impacts across the Plan area and the likely impact relevant to specific areas of the Plan area.

The FESLUP contains a number of objectives relating to afforestation and reforestation, to increase Coillte's forest cover across the estate. Increasing forest cover in Ireland has been assessed as likely to result in overall long-term positive effects on the environment, particularly air and climate factors. However, inappropriate forest expansion and management have the potential to give rise to negative effects, such as pollution events and/or the spread of invasive species.

A generally positive effect on population and material assets is identified, where increased forest-based and non-forest-based areas for amenity, recreation and learning potential, are likely to be facilitated. However, increased human interaction in forested areas and non-forested areas, as well as any associated development, such as carparks, public toilets etc., has the potential to negatively affect some aspects of the environment, through potential contamination, clearance and/or disturbance.

The FESLUP also contains a range of objectives relating to the promotion of wood-based products for construction and energy purposes. An overall positive impact on the environment is identified here, through the promotion of a sustainable, renewable source of building materials, circular economy principles and energy production. Positive effects are particularly noted here on air and climate factors.

Increased afforestation, reforestation, biodiversity and peatland management and restoration, support for renewable energy developments and increased timber use in the construction sector, are likely to result in overall positive, long-term effects on climate. In this way, the FESLUP has the potential to contribute positively and cumulatively towards a wide range of Irish Government and EU policy, within the context in which it sits.

For example, the FESLUP positively contributes towards the objectives of the National Climate Action Plan through the suite of objectives relating to afforestation, reforestation, biodiversity and peatland management and restoration, the increased use of wood products as a renewable resource, and the promotion and support of renewable energy developments. The FESLUP will work to achieve contributions towards reductions in greenhouse gas and other emissions to air and associated achievement of legally binding targets (in combination with Plans and Programmes from all sectors, including energy, transport and land use planning) as a result of facilitating:

- Greater levels of forest cover
- Increased management of Coillte's forest estate – improvement in carbon store potential
- Increased use of renewable resources through the provision of wood and wood products
- Support and promotion of increased renewable energy developments
- Restoration of peatlands (long-term positive climate impacts) and
- Increased production and use of timber as a construction material.

Any development that is likely to occur as a result of the FESLUP, such as forestry related development, wind energy related developments, increased recreational facilities and or other infrastructure have the potential to give rise to adverse impacts on the environment, particularly biodiversity; with potential impacts relating to disturbance, disruption, fragmentation, and loss of habitats. Further, any new development in forested and non-forested areas has the potential to give rise to negative effects on land, soil and water, in the instance of contamination or pollution events.

Technological based innovation of the forestry sector, educational promotions, and apprenticeships, as detailed in objectives as the FESLUP are likely to result in overall neutral or environmental impacts. Promotion of Forest Certification, organisational changes, improved communication structures, development of guidance and management documentation, and the continued implementation of standards and best practice guidance are likely to see overall neutral to positive impacts on the environment, where certain situations represent baseline conditions that are already positively enforced.

### 2.5.6 Interactions and Interrelationships

In accordance with the SEA Directive, the inter-relationship between environmental aspects must be taken into account. The interaction and inter-relationships of relevance for the environmental baseline aspects was an important consideration for the environmental assessment.

Table 2.3 outlines the identifiable inter-relationships that were taken into account during the environmental assessment. It is noted that all environmental aspects interact with each other to some extent, however only significant relationships were considered.

**Table 2.3 Key inter-relationships between environmental aspects**

Environmental Aspect	P & HHH	BIO	L & S	Wat	A, Q & C	AA&C H	L & V	MA
<b>P &amp; HH</b>								
<b>BIO</b>	No							
<b>L &amp; S</b>	Yes	Yes						
<b>Wat</b>	Yes	Yes	Yes					
<b>A, Q &amp; C</b>	Yes	No	Yes	No				
<b>AA &amp; CH</b>	No	No	No	No	No			
<b>L &amp; V</b>	Yes	Yes	No	No	No	No		
<b>MA</b>	No	Yes	No	No	Yes	No	No	

## 2.6 SEA Environmental Report – Consultation

A period of public and statutory consultation process took place from 14<sup>th</sup> September and 26<sup>th</sup> October 2023 to gather feedback on the FESLUP and supporting SEA Environmental Report, in accordance with legislative requirements. The documents were issued to statutory stakeholders and made available for public viewing on the Coillte website.

20 submissions were received on the FESLUP and SEA ER during this time. The content of submissions and comments received during this consultation period were considered by both Arup and Coillte. Amendments were made in response to those consultation inputs, where considered appropriate. Both the SEA ER, and the FESLUP were updated on foot of the recommendations outlined in the submissions received. Appendix 0 contains a summary of the submissions received and how they were responded to.

## 2.7 Technical Difficulties Encountered

During the preparation of GIS Mapping that was used to inform the baseline environmental of the Plan area at SEA Scoping and SEA ER stages, difficulties were encountered while attempting to utilise the EPA’s most recent Landcover datasets. A number of system crashes were experienced while attempting to utilise the datasets.

Ultimately, it is considered at a national level, the EPA landcover dataset includes too much detail to accurately illustrate the baseline environmental status of the country in its entirety. It is considered that at a project specific or local area level the datasets will be largely beneficial. However, for the purposes of this SEA and the national scale of the Plan, this SEA ER incorporates the CORINE landcover dataset to accurately illustrate the baseline environment of the Plan area.

In addition, as noted above, although the baseline environment is illustrated in this report, it is considered of limited value due to the national scale of the Plan.

No further technical difficulties were encountered during the preparation of this SEA ER.

## 2.8 SEA Mitigation Measures

Mitigation measures are measures envisaged and designed to prevent, reduce and as fully as possible offset any significant adverse impacts on the environment of implementing the FESLUP. All mitigation measures have been developed and agreed with Coillte as part of the SEA iterative process. The primary mitigation measure is the development of the Plan which ensures the sustainable and appropriate development of the Plan area without compromising the integrity of the natural and built environment.

However, potential impacts will be more adequately identified and mitigated at project and possible EIA level. In general terms, all proposals for development arising from the FESLUP will be required to have due regard to environmental considerations outlined in this SEA ER and the associated AA.

The majority of objectives are predicted to have a positive environmental impact. However, a number of objectives are proposed that may have a negative environmental impact, particularly those relating to wind energy development where BIO, L&S, WAT and L&V impacts may arise. In addition, the development of recreational areas may result in negative environmental impacts particularly relating to BIO, L&S and WAT, and where increased afforestation is facilitated, negative impacts may particularly be likely for L&S and WAT.

The approach to the development of mitigation is two pronged:

- Reliance of published guidance and policy related to the forestry and wind energy sectors and
- Description of specific mitigation measures that may be implemented depending on the scale, location and nature of the development arising from the FESLUP.

It should be noted that a suite of guidance and policy documents have been developed and published by the DAFM and Coillte over a period of time to minimise the environmental impact of forestry operations. 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 Species Diversification, 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 categorises the environmental risk assessment and management in terms of potential environmental impacts on five receptors, i.e:

1. People & Material Assets
2. Biodiversity
3. Water & Soils
4. Landscape and
5. Archaeology & Cultural Heritage.

The list of current mandatory DAFM documents which shall continue to be complied with are listed below. It should be noted that 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 FESLUP:

### **Department of Agriculture, Food and the Marine - Guidance Documents**

- Aerial Fertilisation Requirements. Forest Service (2015) Department of Agriculture, Food and the Marine
- Environmental Requirements for Afforestation. Forest Service (2016). Department of Agriculture, Food and the Marine
- Forest Protection Guidelines. Forest Service (2000) Department of the Marine and Natural Resources
- Forest Recreation in Ireland A Guide for Forest Owners and Managers (2006) Forest Service, Department of Agriculture and Food

- Forestry & Freshwater Pearl Mussel Requirements: Site Assessment and Mitigation Measures Forest Service (2000) Department of the Marine and Natural Resources
- Forestry & Kerry Slug Guidelines. Forest Service (2000) Department of the Marine and Natural Resources
- Forestry & Otter Guidelines Forest Service (2000) Department of the Marine and Natural Resources
- Forestry and Landscape Guidelines Forest Service (2000) Department of the Marine and Natural Resources
- Forestry and Water Quality Guidelines. Forest Service (2000) Department of the Marine and Natural Resources
- Forestry Biodiversity Guidelines. Forest Service (2000) Department of the Marine and Natural Resources
- Forestry & Archaeology Guidelines. Forest Service (2000) Department of the Marine and Natural Resources
- Forest Harvesting & the Environment Guidelines. Forest Service (2000) Department of the Marine and Natural Resources
- Forestry Standards Manual. Department of Agriculture, Food and the Marine Forest Service (2015)
- Forest Road Manual: Guidelines for the Design, Construction & Management of Forest Roads (Ryan, T., Phillips, H., Ramsay, J. and Dempsey, J. 2004. Forest Road Manual)
- Guidelines for the design, construction and management of forest roads. COFORD, Dublin
- Forests & Water – Achieving Objectives under Ireland’s River Basin Management Plan 2018-2021 Department of Agriculture, Food and the Marine (2018)
- Land Types for Afforestation. Forest Service (2015) Department of Agriculture, Food and the Marine
- Native Woodland Establishment GPC9 & GPC10 Silvicultural Standards Forest Service (2015) Department of Agriculture, Food and the Marine
- Standards for Felling and Reforestation, (2019), Department of Agriculture, Food and the Marine and
- Woodland for Water: Creating new native woodlands to protect and enhance Ireland’s waters. Forest Service (2018) Department of Agriculture, Food and the Marine.

In addition, the following wind energy guidance will be employed as mitigation, where relevant.

- Wind Energy Development Guidelines (2006), Department of Housing, Local Government and Heritage (DHLGH)
- Best Practice Guidelines for the Irish Wind Energy Industry (2012), Wind Energy Ireland (WEI);
- WEI Health and Safety Series - Best Practice Guidelines for Operation of Wind Farm High Voltage Electrical Installations (2021), WEI
- Irish Wind Energy Association (IWEA) Community Engagement Strategy (2018), IWEA and
- Good Neighbour IWEA Best Practice Principles in Community Engagement & Community Commitment (2013), IWEA.

Under each environmental aspect in Table 2.3, those guidance/policy documents from the list above that are particularly relevant, are identified. In addition, specific mitigation measures are also identified where relevant with additional focus on those aspects where potential significant adverse impacts are identified, as outlined earlier.



Further, as outlined in Section 2.1, an AA Screening and NIS have also been prepared in respect of the FESLUP. The Mitigation Measures set out in the NIS should be read in conjunction with those set out in Table 2.4 below. The SEA and NIS mitigation measures are included within the final Plan.

**Table 2.4 Proposed Mitigation Measures**

Aspect	Mitigation	Relevant Objectives to which the mitigation applies:
General	<p>Adherence to all of the mandatory requirements set out in the full suite of DAFM documents, the relevant policies/guidance contained in the Coillte Environmental Management Plan and other relevant guidance/policy.</p> <p>Any new Projects or Plans arising from the implementation of the FESLUP shall be subject to appropriate feasibility, options and environmental assessments (e.g., Environmental Impact Assessment, AA where required). Where projects screen out, potential impacts to biodiversity will be informed by appropriate scientific/ecological advice.</p>	All Objectives.
P&HH	<p>Any new Projects or Plans arising from the implementation of the FESLUP shall adhere to recreation-specific mitigation such as Coillte's recreation and cycling policies, National Outdoor Recreation Strategy and the EU Forest Strategy for 2030.</p> <p><b>FESLUP-Specific Mitigation Measures</b></p> <p>The following are examples of specific mitigation measures that shall be implemented depending on the scale, nature and location of development arising from the FESLUP:</p> <p>Where redesign or development is planned within the Coillte forest estate it should be ensured that it does not impede recreational activity and public access to the forest estate;</p> <p>Minimise disturbance to people and avoid blocking access to properties during works;</p> <p>New public access routes shall be provided where existing access routes are removed during felling and/or afforestation;</p> <p>Appropriate communications plans will be implemented as necessary. The communications plans will provide a mechanism for members of the public to communicate with Coillte and for Coillte to communicate important information to the public, for example, timely communication to local communities on the planned works activities, timings and traffic management.</p> <p>Other specific population and human health mitigation may be identified during the development and assessment of Plans and Projects arising from the implementation of the FESLUP. All such mitigation identified will be implemented in full.</p>	N/A as only positive or neutral impacts have been identified in relation to Population & Human Health.
BIO (including Flora and Fauna)	<p><b>General Forestry-related Mitigation Measures</b></p> <p>Any new Projects or Plans arising from the implementation of FESLUP shall adhere to the following guidance/policies and to best available scientific advice that are of specific relevance to BIO:</p> <p>Draft Plan for Forests &amp; Freshwater Pearl Mussel in Ireland Requirements (2021)</p> <p>Schedule 2 of the European Communities Environmental Objectives (Freshwater Pearl Mussel) Regulations 2009 (S.I. No. 296)</p> <p>Forestry &amp; Freshwater Pearl Mussel Requirements: Site Assessment and Mitigation Measures Forest Service (2000) Department of the Marine and Natural Resource</p>	CO1, C04, CO5, CO7, CO14, CO16, NO2, NO8 , N20, P04, PO14

Aspect	Mitigation	Relevant Objectives to which the mitigation applies:
	<p>Forestry &amp; Kerry Slug Guidelines. Forest Service (2000) Department of the Marine and Natural Resources</p> <p>Forestry &amp; Otter Guidelines Forest Service (2000) Department of the Marine and Natural Resources</p> <p>Forestry Biodiversity Guidelines. Forest Service (2000) Department of the Marine and Natural Resources</p> <p>Forest Harvesting &amp; the Environment Guidelines. Forest Service (20000) Department of the Marine and Natural Resources</p> <p>Woodland for Water: Creating new native woodlands to protect and enhance Ireland’s waters. Forest Service (2018) DAFM</p> <p>The Forest Service Circular 04/2013 banning Ash tree planting</p> <p>Environmental Requirements for Afforestation (DAFM, 2016)</p> <p>Land Types for Afforestation (DAFM, 2015)</p> <p>Forestry Standards Manual (DAFM, 2015)</p> <p>Standards for Felling and Reforestation (DAFM, 2019)</p> <p>Wind Energy Development Guidelines (2006), Department of Housing, Local Government and Heritage (DHLGH).</p> <p><b>FESLUP-Specific Mitigation Measures</b></p> <p>The following are examples of specific mitigation measures that shall be implemented depending on the scale, nature and location of development arising from the FESLUP:</p> <p>Planning applications for development arising from the implementation of the FESLUP must balance or outweigh any potential impacts on biodiversity</p> <p>Development arising from the implementation of the FESLUP should seek to ensure that there is no likely increase in nitrogen deposition at ecological sites sensitive to nitrogen.</p> <p>AA shall be carried out in relation to Works, Plans and Projects arising from the implementation of the FESLUP, likely to impact on European sites (SACs and SPAs), whether directly or indirectly or in combination with any other Plan(s) or Project(s)</p> <p>Works, Plans and Projects arising from the implementation of the FESLUP shall seek to recognise and afford appropriate protection to any existing, new, or modified SPAs or SACs within the Plan area.</p> <p>Works, Plans and Projects arising from the implementation of the FESLUP shall seek to actively promote the conservation and protection of areas designated as an NHA (including proposed sites) and to only consider proposals for development within or affecting an NHA where it can be clearly demonstrated that the proposed development will not have a significant adverse effect on the NHA or pNHA</p> <p>Adherence to best practice guidance in relation to the control of non-native invasive species, including adherence of all relevant DAFM and Coillte policies and documents.</p> <p>Adherence to best practice guidance with regard to the control and management measures for avoiding, preventing, or reducing any significant adverse impacts on the surface water environment during the construction of such works and projects.</p>	

Aspect	Mitigation	Relevant Objectives to which the mitigation applies:
	Other specific biodiversity mitigation may be identified during the development and assessment of Plans and Projects arising from the implementation of the FESLUP.	
L&S	<p><b>General Forestry-related Mitigation Measures</b></p> <p>Any new Projects or Plans arising from the implementation of FESLUP shall adhere to the following guidance/policies that are of specific relevance to L&amp;S (including peatlands):</p> <p>Aerial Fertilisation Requirements. Forest Service (2015) Department of Agriculture, Food and the Marine;</p> <p>Environmental Requirements for Afforestation. \ (2016). Department of Agriculture, Food and the Marine;</p> <p>Forest Protection Guidelines. Forest Service (2000) Department of the Marine and Natural Resources;</p> <p>Forestry and Water Quality Guidelines. Forest Service (2000) Department of the Marine and Natural Resources;</p> <p>Forest Harvesting &amp; the Environment Guidelines. Forest Service (20000 Department of the Marine and Natural Resources;</p> <p>Forestry Standards Manual. Department of Agriculture, Food and the Marine Forest Service (2015);</p> <p>Forest Road Manual: Guidelines for the Design, Construction &amp; Management of Forest Roads (Ryan, T., Phillips, H., Ramsay, J. and Dempsey, J. 2004. Forest Road Manual);</p> <p>Guidelines for the design, construction and management of forest roads. COFORD, Dublin;</p> <p>Forests &amp; Water – Achieving Objectives under Ireland’s River Basin Management Plan 2018-2021 Department of Agriculture, Food and the Marine (2018); and</p> <p>Land Types for Afforestation. Forest Service (2015) Department of Agriculture, Food and the Marine.</p> <p><b>FESLUP-Specific Mitigation Measures</b></p> <p>The following are examples of specific mitigation measures that shall be implemented depending on the scale, nature and location of development arising from the FESLUP:</p> <p>For any new tree planting projects a soils assessment should be undertaken where necessary and relevant to ensure the correct tree species is planted for the soil characteristics;</p> <p>The importance of Geological Heritage Sites will be recognised and appropriate measures implemented to protect the character and integrity of these sites, where relevant;</p> <p>Sediment control and management measures will be implemented, where required;</p> <p>Procedures of Environmental Risk Assessment shall be complied with in the event of an environmental emergency. It will address containment measures, emergency discharge routes, a list of appropriate equipment and clean-up materials and notification procedures to inform the relevant environmental protection authority;</p> <p>Other specific land and soils mitigation measures may be identified during the development and assessment of Plans and Projects arising from the implementation of the FESLUP.</p>	CO1, C04, CO5, CO7, CO14, CO16, NO2, NO8 , N20, P04, PO14, WO1

Aspect	Mitigation	Relevant Objectives to which the mitigation applies:
WAT	<p><b>General Forestry-related Mitigation Measures</b></p> <p>Any new Projects or Plans arising from the implementation of FESLUP shall adhere to the following guidance/policies that are of specific relevance to WAT:</p> <p>Aerial Fertilisation Requirements. Forest Service (2015) Department of Agriculture, Food and the Marine;  Environmental Requirements for Afforestation. Forest Service (2016). Department of Agriculture, Food and the Marine;  Forest Protection Guidelines. Forest Service (2000) Department of the Marine and Natural Resources;  Forestry &amp; Freshwater Pearl Mussel Requirements: Site Assessment and Mitigation Measures Forest Service (2000) Department of the Marine and Natural Resources;  Forestry &amp; Otter Guidelines Forest Service (2000) Department of the Marine and Natural Resources;  Forestry and Water Quality Guidelines. Forest Service (2000) Department of the Marine and Natural Resources;  Forestry Biodiversity Guidelines. Forest Service (2000) Department of the Marine and Natural Resources;  Forests &amp; Water – Achieving Objectives under Ireland’s River Basin Management Plan 2018-2021 Department of Agriculture, Food and the Marine (2018); and  Woodland for Water: Creating new native woodlands to protect and enhance Ireland’s waters. Forest Service (2018) Department of Agriculture, Food and the Marine.</p> <p><b>FESLUP-Specific Mitigation Measures</b></p> <p>The following are examples of specific mitigation measures that shall be implemented depending on the scale, nature and location of development arising from the FESLUP:</p> <p>All forest operations within areas of high-water sensitivity (such as Freshwater Pearl Mussel catchments and high-status objective waterbodies) be planned and managed with a particular regard to the protection of water quality, aquatic ecosystems and species;</p> <p>Implementation of best practice sediment and spill control and management measures, where required;</p> <p>Setback distances from sensitive watercourses will be applied where relevant and will vary depending on soil type, slope and the presence of site conditions such as complex hydrology and uniformly wet ground conditions and the particular sensitivity of the watercourse.</p> <p>Other specific water protection mitigation may be identified during the development and assessment of Plans and Projects arising from the implementation of the FESLUP.</p>	CO1, C04, CO5, CO7, CO14, CO16, NO2, NO8 , N20, P04, PO14, WO1
AQ&C (including Noise)	<p><b>General Forestry-related Mitigation Measures</b></p> <p>Any new Projects or Plans arising from the implementation of the FESLUP shall adhere to the following guidance/policies that are of specific relevance to AQ&amp;C:</p> <p>Aerial Fertilisation Requirements. Forest Service (2015) Department of Agriculture, Food and the Marine;</p>	CO1, C04, CO5, CO7, CO14, CO16, NO2, NO8 , N20, P04, PO14

Aspect	Mitigation	Relevant Objectives to which the mitigation applies:
	<p>Environmental Requirements for Afforestation. Forest Service (2016). Department of Agriculture, Food and the Marine;</p> <p>Forestry Biodiversity Guidelines. Forest Service (2000) Department of the Marine and Natural Resources;</p> <p>Forest Harvesting &amp; the Environment Guidelines. Forest Service (2000) Department of the Marine and Natural Resources;</p> <p>Forestry Standards Manual. Department of Agriculture, Food and the Marine Forest Service (2015);</p> <p>Forest Road Manual: Guidelines for the Design, Construction &amp; Management of Forest Roads (Ryan, T., Phillips, H., Ramsay, J. and Dempsey, J. 2004. Forest Road Manual);</p> <p>Guidelines for the design, construction and management of forest roads. COFORD, Dublin;</p> <p>Wind Energy Development Guidelines (2006), Department of Housing, Local Government and Heritage (DHLGH).</p> <p><b>FESLUP-Specific Mitigation Measures</b></p> <p>The following are examples of specific mitigation measures that shall be implemented depending on the scale, nature and location of development arising from the FESLUP:</p> <p>Where practicable, the transport of timber by rail and water rather than road;</p> <p>Nitrogen deposition at ecological areas that are sensitive to nitrogen is not increased. Where there is a potential for an increase in nitrogen deposition to occur at an ecological site due to Coillte activities, an assessment shall be carried out to ensure that nitrogen deposition is not increased at these sites;</p> <p>Ensure that machinery used in forest operations is managed so as to minimise the potential for any offsite air, noise or vibration impacts.</p> <p>Minimise dust and noise nuisance off site.</p> <p>Other specific air quality and climate mitigation may be identified during the development and assessment of Plans and Projects arising from the implementation of the FESLUP.</p>	
AA&CH	<p><b>General Forestry-related Mitigation Measures</b></p> <p>Any new Projects or Plans arising from the implementation of the FESLUP shall adhere to the following guidance/policies that are of specific relevance to AA&amp;CH:</p> <p>Environmental Requirements for Afforestation. Forest Service (2016). Department of Agriculture, Food and the Marine; and</p> <p>Forestry &amp; Archaeology Guidelines. Forest Service (2000) Department of the Marine and Natural Resources.</p> <p><b>FESLUP-Specific Mitigation Measures</b></p> <p>The following are examples of specific mitigation measures that shall be implemented depending on the scale, nature and location of development arising from the FESLUP:</p>	CO1, C04, CO5, CO7, CO14, CO16, NO2, NO8 , N20, P04, PO14



Aspect	Mitigation	Relevant Objectives to which the mitigation applies:
	<p>Ensure protection, where practicable of structures, which are of special architectural, historical, archaeological, artistic, cultural, scientific, social, or technical interest and to safeguard sites, features and objects of archaeological interest generally;</p> <p>Secure the preservation (i.e., preservation in situ or in exceptional cases preservation by record) of all archaeological monuments included in the Record of Monuments and Places as established under Section 12 of the National Monuments (Amendment) Act, 1994, and of sites, features and objects of archaeological and historical interest generally;</p> <p>Trees within archaeological exclusion zones should only be felled following the preparation by an archaeologist or other suitably qualified environmental professional, in conjunction with a forester or arborist, of a plan outlining the most appropriate means to fell and remove trees from on or around the monument.</p> <p>Other specific archaeology, architectural and cultural heritage mitigation may be identified during the development and assessment of Plans and Projects arising from the implementation of the FESLUP. All such mitigation identified will be implemented in full.</p>	
L&V	<p><b>General Forestry-related Mitigation Measures</b></p> <p>Any new Projects or Plans arising from the implementation of FESLUP shall adhere to the following guidance/policies that are of specific relevance to L&amp;V:</p> <p>Environmental Requirements for Afforestation. Forest Service (2016). Department of Agriculture, Food and the Marine;</p> <p>Forestry and Landscape Guidelines Forest Service (2000) Department of the Marine and Natural Resources;</p> <p>Forestry Biodiversity Guidelines. Forest Service (2000) Department of the Marine and Natural Resources;</p> <p>Native Woodland Establishment GPC9 &amp; GPC10 Silvicultural Standards Forest Service (2015) Department of Agriculture, Food and the Marine;</p> <p>Standards for Felling and Reforestation, (2019), Department of Agriculture, Food and the Marine;</p> <p>Wind Energy Development Guidelines (2006), Department of Housing, Local Government and Heritage (DHLGH).</p> <p><b>FESLUP-Specific Mitigation Measures</b></p> <p>The following are examples of specific mitigation measures that shall be implemented depending on the scale, nature and location of development arising from the FESLUP:</p> <p>Any new Projects or Plans arising from the implementation of the FESLUP shall seek to protect sensitive areas from inappropriate development while providing for development and change that will benefit the rural community.</p> <p>Any new Projects or Plans arising from the implementation of the FESLUP shall be cognisant of the character of the landscape by reviewing the local landscape character assessment prior to the acquisition of new land/ development of land for afforestation.</p> <p>Any new Projects or Plans arising from the implementation of the FESLUP shall carry out appropriate monitoring to ensure the successful establishment of forest edge planting and environmental setback planting (where undertaken)</p>	CO1, C04, CO5, CO7, CO14, CO16, NO2, NO8 , N20, P04, PO14, WO1

Aspect	Mitigation	Relevant Objectives to which the mitigation applies:
	<p>and maintain trees as appropriate (e.g., vegetation management, replacement of mortalities, adjustment and eventual removal of tree shelters) until the trees are established and free of vegetation competition or browsing pressure.</p> <p>Other specific landscape and visual mitigation may be identified during the development and assessment of Plans and Projects arising from the implementation of the FESLUP. All such mitigation identified will be implemented in full.</p>	
MA	<p><b>General Forestry-related Mitigation Measures</b></p> <p>Any new Projects or Plans arising from the implementation of the FESLUP shall adhere to the following guidance/policies that are of specific relevance to MA:</p> <p>Environmental Requirements for Afforestation. Forest Service (2016). Department of Agriculture, Food and the Marine;</p> <p>Forest Recreation in Ireland A Guide for Forest Owners and Managers (2006) Forest Service, Department of Agriculture and Food;</p> <p>Forestry Standards Manual. Department of Agriculture, Food and the Marine Forest Service (2015); and</p> <p>Forest Road Manual: Guidelines for the Design, Construction &amp; Management of Forest Roads (Ryan, T., Phillips, H., Ramsay, J. and Dempsey, J. 2004. Forest Road Manual).</p> <p><b>FESLUP-Specific Mitigation Measures</b></p> <p>The following are examples of specific mitigation measures that shall be implemented depending on the scale, nature and location of development arising from the FESLUP:</p> <p>Any Onshore and Offshore wind development and associated infrastructure such as landing sites, cable routes, substations, etc., shall be subject to appropriate feasibility, options and environmental assessments (e.g., Environmental Impact Assessment, AA where required).</p> <p>Other specific material assets mitigation may be identified during the development and assessment of Plans and Projects arising from the implementation of the FESLUP.</p>	CO1, C04, CO5, CO7, CO14, CO16, NO2, NO8 , N20, P04, PO14

## 2.9 SEA Monitoring Measures

Article 10 of the SEA Directive requires that monitoring should be carried out in order to identify at an early stage any unforeseen adverse impacts associated with the implementation of the Plan or Programme.

A monitoring programme is developed based on the indicators selected to track progress towards achieving strategic environmental objectives and reaching targets, enabling positive and negative impacts on the environment to be measured. As previously described, the environmental indicators have been developed to show changes that would be attributable to implementation of the FESLUP.

As outlined in the EPA guidance document ‘*Guidance on SEA Statements and Monitoring*’ (EPA, 2020), SEA monitoring should reflect the nature and level of detail of the Plan/Programme (EPA, 2020)<sup>6</sup>. Many national-level Plans/Programmes lack geographic specificity, contain only high-level strategic objectives and do not lend themselves to cause–effect models in terms of direct measuring of environmental effects. As such, SEA monitoring for these Plans should focus on national indicators to examine environmental trends.

Refer to Table 2.5 for the proposed monitoring measures. The monitoring measures included are based on national indicators and informed by the content of the FESLUP.

The SEA carried out has ensured that any potential significant environmental impacts have been identified and given due consideration.

Coillte is responsible for collating existing relevant monitored data, the preparation of preliminary and final monitoring evaluation reports, the publication of these reports and, if necessary, the carrying out of corrective action.

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<sup>6</sup> EPA (2020) Guidance on SEA Statements and Monitoring. Available at: [Strategic Environmental Assessment | Environmental Protection Agency \(epa.ie\)](https://www.epa.ie/publications-and-reports/strategic_environmental_assessment/strategic_environmental_assessment_guidance_on_sea_statements_and_monitoring)

**Table 2.5 Proposed monitoring measures for the FESLUP**

Environmental Component	Likely Significant Environmental Effects Identified	SEA Indicators	Monitoring Source	Frequency/ Responsibility
P&HH	No definitive likely negative effects on population and human health have been identified, predominantly neutral and positive impacts were identified as likely to occur for population and human health for the purposes of this assessment.	<p>Number of health and safety incidents among forest workers.</p> <p>Number of people utilising Coillte’s estate for amenity and recreational purposes.</p> <p>Economic growth statistics for individuals working across Coillte’s estate.</p> <p>Achievement of Coillte’s Forests for People pillar outlined in Coillte’s Strategic Vision.</p> <p>Number of individuals employed directly and indirectly as a result of activity on or arising from the Coillte estate.</p> <p>Number of forests planted for drinking water source protection.</p>	<ol style="list-style-type: none"> <li>1. HSA - Farmers’ Health and Wellbeing Report and Review of Work-Related Fatalities in Agriculture in Ireland.</li> <li>2. Research and Monitoring carried out for the Irish Forestry and Recreation Report and Forest Statistics 2021 Report.</li> <li>3. Monitoring related to the FESLUP such as: Developing a set of metrics to develop targets and an approach to monitoring and reporting progress towards achieving these across the estate, integrate into planning and operations procedures for protecting, monitoring, and reporting relevant environmental parameters across the estate and expanding digital services to support the mapping and analysis of Recreational Areas and improve efficiencies in monitoring and management.</li> <li>4. Monitoring of the effects of forestry and wind energy related project developments required under separate processes (EIA, AA)</li> <li>5. Monitoring related to relevant Local Area Plans and County/City Development Plans or RSES’s, particularly LAP Quarterly Reviews.</li> <li>6. Coillte Annual Report.</li> <li>7. Irish Water and National Federation of Group Water Schemes water quality monitoring and Source Protection Plans, EPA drinking water quality monitoring.</li> </ol>	<ol style="list-style-type: none"> <li>1. Health Safety Authority (HSA), continuously.</li> <li>2. DAFM, COFORD, NPWS and Coillte, varies.</li> <li>3. Coillte, continually.</li> <li>4. In accordance with the monitoring provisions of EIA/ AA.</li> <li>5. In accordance with the monitoring provisions of the lower-level Plans. Quarterly review basis.</li> <li>6. Coillte, annually.</li> <li>7. EPA annual reports.</li> </ol>

Environmental Component	Likely Significant Environmental Effects Identified	SEA Indicators	Monitoring Source	Frequency/ Responsibility
<p>BIO (including Flora and Fauna)</p>	<p>Objectives in the FESLUP have been identified as having potential to result in negative effects on biodiversity during the construction of and or any development that has potential to occur across Coillte’s estate, e.g., support of renewable energy developments, increased recreational facilities etc.</p> <p>Objectives in the FESLUP have been identified as having potential to result in negative effects on biodiversity whereby, they relate to the provision of forest amenities and facilities in forests and non-forested areas. Increased human interaction in forested areas, and any development - such as carparks, public toilets etc. within forests have the potential to negatively affect biodiversity through potential contamination, clearance and/or disturbance.</p> <p>Objectives in the FESLUP have been identified as having potential to result in negative effects on biodiversity whereby, if afforestation on peatlands is facilitated, it is likely to disrupt the natural characteristics, biodiversity of peat soil and the surrounding water bodies.</p> <p>A range of objectives have also been identified, for the purposes of this assessment, as having the potential to result in ‘uncertain’ effects on biodiversity.</p> <p>This means that in the worst-case scenario there is potential for further negative environmental effects to occur. The SEA monitoring measures outlined have</p>	<p>Number and condition of Natura 2000 network, European sites in proximity to or on Coillte’s estate, as per Article 17 Reports, and the maintenance of conservation objectives.</p> <p>Status of Annex 1 forest habitats and species as per Article 17 Reports.</p> <p>Achievement of favourable conservation status of designated sites.</p> <p>Area of new forest creation across Coillte’s estate.</p> <p>Area of new infrastructure development across Coillte’s estate.</p> <p>Achievement of the Objectives of the National Biodiversity Action Plan.</p> <p>Achievement of Coillte’s Forest for Nature pillar outlined in Coillte’s Strategic Vision.</p> <p>Status of protected Freshwater Species on or related to the Coillte estate.</p> <p>Status of protected Bird Species – BOCCI on or related to the Coillte estate.</p> <p>Area damaged by forest fires.</p> <p>Number of incident responses e.g., following flooding, fire, invasive species occurrence, deer incidents etc.</p>	<ol style="list-style-type: none"> <li>1. Coillte’s BioClass Mapping and Coillte’s Annual Report.</li> <li>2. The Status of EU Protected Habitats and Species in Ireland Article 17 Report (Department of Housing, Local Government and Heritage).</li> <li>3. Monitoring of the effects of forestry and wind energy related project development required under separate processes (EIA, AA).</li> <li>4. Updates to National Red List Check List.</li> <li>5. Monitoring related to the FESLUP such as: Exploring effective, targeted approaches to monitoring at scale the ecological benefits of biodiversity management actions and developing partnerships with relevant agencies to enable monitoring of valuable habitats and species and, developing a set of metrics to develop targets and an approach to monitoring and reporting progress towards achieving these across the estate.</li> <li>6. Inland Fisheries Ireland – Protected Freshwater Species – Atlantic Salmon etc – trends in protected freshwater species, population, distribution, health etc.</li> <li>7. Birds of Conservation Concern Ireland – Monitoring by Birdwatch Ireland on status, distribution, population etc.</li> </ol>	<ol style="list-style-type: none"> <li>1. Coillte, annually.</li> <li>2. DHLGH, every 6 years.</li> <li>3. In accordance with the monitoring provisions of EIA/AA.</li> <li>4. NPWS, varies.</li> <li>5. Coillte, continually.</li> <li>6. Inland Fisheries Ireland, varies.</li> <li>7. Birdwatch Ireland, every 6 years.</li> <li>8. Coillte, continually.</li> <li>9. Local Authorities, continuously.</li> <li>10. EPA, every 4 years.</li> <li>11. EPA, continuously.</li> <li>12. EPA, continuously.</li> <li>13. Coillte, continually.</li> <li>14. Coillte, continually.</li> <li>15. DAFM, NPWS and Coillte, varies.</li> </ol>

Environmental Component	Likely Significant Environmental Effects Identified	SEA Indicators	Monitoring Source	Frequency/ Responsibility
	<p>been developed to also take these potential negative effects into account.</p>		<p>8. Monitoring related to the FESLUP such as: Developing an appropriate set of monitoring standards for environmental parameters relevant to Coillte's estate and activities. Exploring effective, targeted approaches to monitoring at scale the ecological benefits of biodiversity management actions and developing partnerships with relevant agencies to enable monitoring of valuable habitats and species and also developing a set of metrics to develop targets and an approach to monitoring and reporting progress towards achieving these across the estate.</p> <p>9. Monitoring related to relevant Local Area Plans and County/City Development Plans.</p> <p>10.EPA State of the Environment Report 2020.</p> <p>11.Ireland's National Water Framework Directive Monitoring Programme, 2019-2021.</p> <p>12.EPA Water Quality of Ireland Report 2016-2021.</p> <p>13.Records of Forest Fires, where relevant.</p> <p>14.Monitoring related to the FESLUP such as: Developing an appropriate set of monitoring standards for environmental parameters relevant to Coillte's estate and activities and monitoring forest health and condition to detect and mitigate against the potential impact of pests and diseases and guide management interventions.</p>	



Environmental Component	Likely Significant Environmental Effects Identified	SEA Indicators	Monitoring Source	Frequency/ Responsibility
			15. Monitoring related to the Deer Management Strategy Group.	
L&S	<p>Objectives in the FESLUP have been identified as having potential to result in negative effects on land and soil during the construction of and or any development that has potential to occur across Coillte's estate.</p> <p>Objectives in the FESLUP have been identified as having potential to result in negative effects on land and soil whereby, if afforestation on peatlands is facilitated, it is likely to disrupt the natural characteristics of peat soil and the surrounding water bodies. If considered appropriate, sub-standard forestry operations also have the potential to result in erosion, landslides, compaction, contamination, losses of soil organic matter, erosion, soil sealing, leaching, and changes in soil biodiversity.</p> <p>Objectives in the FESLUP have been identified as having potential to result in negative effects on land and soil whereby, they relate to the provision of forest amenities and recreational facilities across the Coillte estate.</p> <p>Increased human interaction in forested areas, and any development - such as carparks, public toilets etc. within forests have the potential to negatively affect land and soil through potential contamination, clearance and/or disturbance.</p>	<p>Number and condition of designated geological features.</p> <p>Incidences of pollution events related to activities on Coillte's estate.</p> <p>Concentrations of nitrogen dioxide, sulphur dioxide and ammonia in proximity to Coillte's estate that may give rise to nitrogen deposition and acidification of soils.</p> <p>Number of hectares forested annually by Coillte and number of tree-felling licences granted to Coillte.</p> <p>Area of Coillte estate subject to illegal deforestation.</p> <p>Rates of forestry creation, forestry related developments and or wind energy developments e.g., forest roads, wind turbines and construction, where permitted and appropriate across Coillte's estate.</p> <p>Area of peatland restored across Coillte's estate.</p>	<p>1. Monitoring for Geological Survey Ireland (GSI) Database.</p> <p>2. EPA State of the Environment Report 2020.</p> <p>3. Monitoring related to the FESLUP such as: Developing an appropriate set of monitoring standards for environmental parameters relevant to Coillte's estate and activities. Exploring effective, targeted approaches to monitoring at scale the ecological benefits of biodiversity management actions and developing partnerships with relevant agencies to enable monitoring of valuable habitats and species and also developing a set of metrics to develop targets and an approach to monitoring and reporting progress towards achieving these across the estate.</p> <p>4. Monitoring of the effects of project developments required under separate processes (EIA, AA).</p> <p>5. Monitoring related to the FESLUP such as: Establishing monitoring and management frameworks for redesigned peatlands and developing an appropriate set of monitoring standards for environmental parameters relevant to Coillte's estate and activities.</p>	<p>1. GSI, varies.</p> <p>2. EPA, every 4 years.</p> <p>3. Coillte, continually.</p> <p>4. In accordance with the monitoring provisions of EIA/ AA.</p> <p>5. Coillte, continually.</p>
WAT	Objectives in the FESLUP have been identified as having potential to result in negative effects on water during the	Proportion of water bodies in forestry catchments meeting their WFD Ecological Status objectives, as	1. Ireland's National Water Framework Directive Monitoring Programme, 2019-2021. River Basin Management	<p>1. EPA, continuously.</p> <p>2. DHLGH, every 6 years.</p> <p>3. EPA, continuously.</p>

Environmental Component	Likely Significant Environmental Effects Identified	SEA Indicators	Monitoring Source	Frequency/ Responsibility
	<p>construction of any development that has potential to occur across Coillte's estate.</p> <p>Objectives in the FESLUP have been identified as having potential to result in negative effects on water whereby, if afforestation on peatlands is facilitated, it is likely to disrupt the natural characteristics of peat soil and the surrounding water bodies.</p> <p>Soil contamination can result in leeching, and potential eutrophication of waters.</p> <p>A range of objectives have also been identified, for the purposes of this assessment, as having the potential to result in 'uncertain' effects on water. This means that in the worst-case scenario there is potential for further negative environmental effects to occur. The SEA monitoring measures outlined have been developed to also take these potential negative effects into account.</p>	<p>reported by the EPA Water Monitoring Programme for the WFD.</p> <p>Status of aquatic habitats and species on the Coillte estate.</p> <p>Number of significant pollution events recorded arising from Coillte activity.</p> <p>The area of land assigned to permanent water setback across Coillte's estate.</p>	<p>Plan for Ireland 2018 -2021 (2022 – 2027).</p> <ol style="list-style-type: none"> <li>2. The Status of EU Protected Habitats and Species in Ireland Report (Department of Housing, Local Government and Heritage).</li> <li>3. EPA Water Quality of Ireland Report 2016-2021.</li> <li>4. EPA State of the Environment Report 2020.</li> <li>5. Monitoring related to the FESLUP such as: Developing an appropriate set of monitoring standards for environmental parameters relevant to Coillte's estate and activities and developing a set of metrics to develop targets and an approach to monitoring and reporting progress towards achieving these across the estate.</li> <li>6. Monitoring for the EPA Catchments Unit and Local Authority Waters Programme.</li> <li>7. DAFM water monitoring of eight heavily forested waterbodies.</li> <li>8. Monitoring related to the FESLUP such as: Developing an appropriate set of monitoring standards for environmental parameters relevant to Coillte's estate and activities and developing a set of metrics to develop targets.</li> </ol>	<ol style="list-style-type: none"> <li>4. EPA, every 4 years.</li> <li>5. Coillte, continuously.</li> <li>6. EPA Catchment Unit, DHLGH and relevant local authorities, varies.</li> <li>7. DAFM, twice annually, spring and autumn.</li> <li>8. Coillte, varies.</li> </ol>
AQ&C (including Noise)	<p>While no definitive likely negative effects on air and climate have been identified in the assessment, a number of 'uncertain' effects have been identified. This means that in the worst-case scenario there is potential for negative</p>	<p>Coillte's forestry related traffic, transport and vehicular survey data.</p> <p>Area of forest cover across Coillte's estate.</p>	<ol style="list-style-type: none"> <li>1. Monitoring related to the FESLUP such as:</li> <li>2. Developing an appropriate set of monitoring standards for environmental parameters relevant to</li> </ol>	<ol style="list-style-type: none"> <li>1. Coillte, continually.</li> <li>2. Coillte, continuously.</li> <li>3. SEAI, varies.</li> </ol>

Environmental Component	Likely Significant Environmental Effects Identified	SEA Indicators	Monitoring Source	Frequency/ Responsibility
	<p>environmental effects to occur with respect to air, noise and climate. The SEA monitoring measures outlined have been developed to take these potential negative effects into account.</p>	<p>Annual afforestation, reforestation, restoration, and rewilding targets for Coillte's forest estate and achievement of Coillte's Forests for Climate pillar outlined in Coillte's Strategic Vision.</p> <p>GHG emission reductions over the Plan period on or related to Coillte's estate and achievement of Coillte's Forests for Climate pillar outlined in Coillte's Strategic Vision.</p> <p>Noise monitoring data from licensed forestry operations.</p> <p>Onsite dust monitoring of forestry operations.</p>	<p>Coillte's estate and activities. Exploring effective, targeted approaches to monitoring at scale the ecological benefits of biodiversity management actions and developing partnerships with relevant agencies to enable monitoring of valuable habitats and species and developing a set of metrics to develop targets and an approach to monitoring and reporting progress towards achieving these across the estate.</p> <p>3. Monitoring related to the FESLUP such as: Developing an appropriate set of monitoring standards for environmental parameters relevant to Coillte's estate and activities, and integrating into planning and operations procedures for protecting, monitoring and reporting relevant environmental parameters across the estate.</p> <p>4. Sustainable Energy Authority of Ireland (SEAI) – Energy in Ireland Report/ Monitoring for Sustainable Biomass Fuels in Ireland.</p> <p>5. Monitoring of the effects of forestry and wind energy related project development required under separate processes (EIA, AA).</p> <p>6. EPA Greenhouse Gas Emissions Report.</p> <p>7. EPA Climate Change Projections.</p> <p>8. Monitoring of the FESLUP, its objectives and performance against any ambitions set out. Particularly, in developing an appropriate set of monitoring standards for</p>	<p>4. In accordance with the monitoring provisions of EIA/ AA.</p> <p>5. EPA reports sectorally on an annual basis.</p> <p>6. EPA, varies.</p> <p>7. EPA, varies</p> <p>8. Coillte, continuously.</p> <p>9. In accordance with the monitoring provisions of the lower-level Plans.</p> <p>10. In accordance with the monitoring provisions if stipulated as a result of an EIA/ AA.</p>

Environmental Component	Likely Significant Environmental Effects Identified	SEA Indicators	Monitoring Source	Frequency/ Responsibility
			<p>environmental parameters relevant to Coillte's estate and activities.</p> <p>9. Monitoring related to relevant Local Area Plans and County/City Development Plans or RSEs.</p> <p>10. Monitoring of the effects of forestry and wind energy related projects and or development required under separate processes (EIA, AA).</p>	
AA&CH	<p>While no definitive likely negative effects on archaeological architectural and cultural heritage have been identified in the assessment, a number of 'uncertain' effects have been identified. This means that in the worst-case scenario there is potential for negative environmental effects to occur with respect to archaeological architectural and cultural heritage. The SEA monitoring measures outlined have been developed to take these potential negative effects into account.</p>	<p>Number of entries to the Record of Monuments and Places, and the immediate setting of these entries including their relationships with forestry projects, forest areas and the surrounding landscape.</p> <p>Full or partial loss to entries to the RPSs/NIAHs across Coillte's estate.</p> <p>Results of Archaeological Impact Assessments and or archaeological investigations undertaken, related to forest creation and or development.</p> <p>Number of uninhabited and derelict structures across Coillte's estate.</p>	<ol style="list-style-type: none"> <li>1. Registers of nationally protected sites and structures.</li> <li>2. The National Inventory of Architectural Heritage.</li> <li>3. Monitoring of the effects of forestry projects and or development required under separate processes (EIA, SEAA)</li> <li>4. Monitoring related to relevant Local Area Plans and County/City Development Plans or RSES's.</li> <li>5. An Bord Pleanala Planning Records for Ireland.</li> <li>6. Coillte's Annual Report.</li> <li>7. Monitoring of any previously unrecorded features of archaeological significance identified within the Coillte estate.</li> <li>8. Registers of nationally protected sites and structures.</li> <li>9. Monitoring of the effects of forestry and or wind energy related projects and or development required under separate processes (EIA, AA)</li> </ol>	<ol style="list-style-type: none"> <li>1. NPWS (National Parks and Wildlife Services), NMS (National Monuments Service), UNESCO, continually.</li> <li>2. The Department of Housing, Local Government and Heritage are responsible for monitoring the conditions of, recording the presence of, and conserving Ireland's protected sites on a routine basis.</li> <li>3. In accordance with the monitoring provisions of EIA/ SEA/ AA.</li> <li>4. In accordance with the monitoring provisions of the lower-level Plans.</li> <li>5. Planning records from An Bord Pleanala or relevant County Council Authority should be reviewed and recorded at least at the Plan min-term review stage (3 years). Assessment and recording of trends are conducted on an annual basis where possible.</li> <li>6. Coillte, annually.</li> <li>7. Coillte, continuously.</li> <li>8. NPWS (National Parks and Wildlife Services), NMS (National</li> </ol>

Environmental Component	Likely Significant Environmental Effects Identified	SEA Indicators	Monitoring Source	Frequency/ Responsibility
				Monuments Service), UNESCO, continually. 9. In accordance with the monitoring provisions of EIA/ AA.
L&V	<p>Objectives in the FESLUP have been identified as having potential to result in negative effects on landscape and visuals where, any development has potential to occur across Coillte's estate e.g., support of renewable energy developments.</p> <p>A range of objectives have also been identified, for the purposes of this assessment, as having the potential to result in 'uncertain' effects on landscape and visuals, particularly related to likely increases in forest cover.</p> <p>This means that in the worst-case scenario there is potential for further negative environmental effects to occur. The SEA monitoring measures outlined have been developed to also take these potential negative effects into account.</p>	<p>Rates of forestry development within designated landscapes.</p> <p>Rates of forest developments and planting..</p> <p>Number and scale of wind developments across Coillte's estate.</p>	<ol style="list-style-type: none"> <li>1. Monitoring of the effects of forestry projects and or development required under separate processes (EIA, AA).</li> <li>2. Monitoring related to relevant Local Area Plans and County/City Development Plans or RSES's e.g., Landscape Character Assessments as part of County Development Plans.</li> <li>3. Monitoring of FESLUP, its objectives and performance against any ambitions set out, particularly relating to forest creation (afforestation and reforestation), development, and or redesign projects.</li> <li>4. Coillte mapping resurveys.</li> <li>5. Corrine mapping resurveys.</li> <li>6. Monitoring of the FESLUP, its objectives and performance against any ambitions set out, particularly relating to support of wind energy developments.</li> </ol>	<ol style="list-style-type: none"> <li>1. In accordance with the monitoring provisions of EIA/ AA.</li> <li>2. In accordance with the monitoring provisions of the lower-level Plans – Relevant Local Authorities, continuously.</li> <li>3. Coillte, continuously.</li> <li>4. Coillte, varies.</li> <li>5. DAFM, Coillte and the EPA, varies.</li> <li>6. Coillte, continuously.</li> </ol>
MA	<p>While no definitive likely negative effects on material assets have been identified in the assessment, a number of 'uncertain' effects have been identified. This means that in the worst-case scenario there is potential for negative environmental effects to occur with respect to material assets. The SEA monitoring measures outlined have been developed to take these potential negative effects into account.</p>	<p>Statistics on the quantity of forest products produced (and exported) and achievement of Coillte's Forests for Wood pillar outlined in Coillte's Strategic Vision.</p> <p>Achievement of Ireland's renewable energy targets and increased use of forest based products as a renewable energy source amongst, the achievement of Coillte's Forests for Climate pillar outlined in Coillte's Strategic Vision.</p>	<ol style="list-style-type: none"> <li>1. Research and Monitoring carried out for the Irish Forestry and the Economy Report and Forest Statistics 2021 Report.</li> <li>2. Sustainable Energy Authority of Ireland (SEAI) – Energy in Ireland Report/ Monitoring for Sustainable Biomass Fuels in Ireland.</li> <li>3. Coillte Annual Report.</li> <li>4. Coillte Annual Report.</li> </ol>	<ol style="list-style-type: none"> <li>1. DAFM, COFORD, NPWS and Coillte, varies.</li> <li>2. SEAI, varies.</li> <li>3. Coillte, annually.</li> <li>4. Coillte, annually.</li> <li>5. Coillte, continuously.</li> <li>6. DAFM, COFORD, NPWS and Coillte, varies.</li> <li>7. SEAI, annually.</li> </ol>

Environmental Component	Likely Significant Environmental Effects Identified	SEA Indicators	Monitoring Source	Frequency/ Responsibility
		<p>Employment Statistics for the activities on or related to Coillte's estate.</p> <p>Amount of forest products available and the value of and or revenue of products.</p> <p>Amount of woody biomass used for renewable energy generation in Ireland annually.</p> <p>Location and/or level of forestry related infrastructure including forest roads across Coillte's estate.</p> <p>Location and/or size of renewable wind energy related infrastructure.</p>	<p>5. Monitoring of the FESLUP, its objectives and performance against any ambitions set out, particularly relating to forest-based products, support of renewable energy sources and forestry related GHG emissions.</p> <p>6. Research and Monitoring carried out for the Irish Forests and Renewable Energy Report and Forest Statistics 2021 Report.</p> <p>7. Monitoring for Energy in Ireland Report 2021 (SEAI).</p> <p>8. Monitoring of the effects of forestry creation and or related developments required under separate processes (EIA, AA).</p> <p>9. Monitoring related to relevant Local Area Plans and County/City Development Plans or RSES's</p> <p>10. An Bord Pleanala/Relevant County Council Planning Records.</p> <p>11. Monitoring of the FESLUP, its objectives and performance against any ambitions set out, particularly relating to forestry related technological and innovative developments and or upgrades.</p> <p>12. EPA State of the Environment Report 2020.</p> <p>13. Monitoring of the FESLUP, its objectives and performance against any ambitions set out, particularly relating to support of wind energy development.</p>	<p>8. In accordance with the monitoring provisions of EIA/ AA.</p> <p>9. In accordance with the monitoring provisions of the lower-level Plans.</p> <p>10. Planning records from An Bord Pleanala or relevant County Council Authority should be reviewed and recorded at least at the Plan min-term review stage (3 years). Assessment and recording of trends are conducted on an annual basis where possible.</p> <p>11. Coillte, continuous.</p> <p>12. EPA, every 4 years.</p> <p>13. Coillte, continuously.</p>



### 3. Appropriate Assessment

Stage 1 AA (Screening) was undertaken by Coillte to identify if the potential for effects of implementing the FESLUP on the conservation status of designated Natura 2000 sites within the sphere of influence of the plan (or project). It was determined as part of this screening that there was potential for significant effects and/or in-combination effects on European sites as a result of implementing the FESLUP. A Natura Impact Statement (NIS) was subsequently prepared.

The NIS documented a range of proposed measures which aim to mitigate against any adverse effects arising from the implementation of the FESLUP.

### 4. Final Appraisal: How Environmental Considerations were integrated into the FESLUP

This Section summarises how environmental considerations were integrated into the adopted FESLUP, throughout the SEA process.

The SEA process for the FESLUP ensured the integration of environmental considerations as follows:

- Undertaking the SEA in parallel with the FESLUP;
- Undertaking the SEA with close regular contact between the FESLUP team and the SEA team;
- Issuing the Scoping Report to the Environmental Authorities for comments on key environmental issues and the proposed scope of the SEA at the earliest possible stage of the FESLUP preparation; and
- Carrying out a full assessment of the environmental effects of the FESLUP and recommending and making changes to the FESLUP as a result.

#### Identification of environmental constraints

As described in Section 2, the SEA team undertook an assessment of baseline environmental conditions of the FESLUP area, with reference to biodiversity, population and human health, land and soil, water, air and climate, heritage, landscape, and material assets. This information was used to focus the SEA objectives, develop alternatives, and assess positive and negative impacts associated with the implementation of the proposed FESLUP. An Environmental Sensitivity Map was prepared to enable this assessment and to influence alternatives discussions and assessment of policies.

The FESLUP and SEA ER took into account the most up to date data which included but is not limited to, findings of the EPA Ireland's National Inventory Report 2022 (EPA, 2022), EPA Water Quality in Ireland 2016-2021 (EPA, 2022) and 2020 State of the Environment Report (EPA, 2020) which were integrated into the SEA Environmental Report, amongst a large amount of forestry documentation, including but not limited to, Forestry Statistics 2022 (DAFM, 2022) and DAFM's 2022 Irelands National Forest Inventory (DAFM, 2022).

#### SEA Scoping

As described in Section 2.3, the SEA Scoping was a key part of the assessment process as it provided information to allow consultation with defined statutory bodies and environmental authorities on the scope and level of detail to be considered and incorporated at an early stage in the assessment.

Refer to Appendix A.1 for the submissions received during the scoping consultation and how they were responded to and incorporated into the SEA ER and FESLUP.

### Assessment of alternatives

The SEA team worked with Coillte from the outset to assist Coillte in becoming familiar with the process. The SEA team issued Coillte the EPA Guidance on Developing and Assessing Alternatives in SEA, as well as some examples from similar plans in the public domain.

Both the SEA team and Coillte acknowledged that the ‘Do Nothing’ scenario would not be a reasonable alternative to undertake and that Coillte needed to develop a number of other scenarios related to the alternative levels of ambition with which would satisfy the ambitions of the overarching Strategic Vision. The alternatives were then subject to assessment by the SEA team and the assessment outcomes were considered by Coillte in the identification of emerging preferred alternatives.

Refer to Section 2.5.3 for details on the consideration of alternatives.

### Plan Objectives

The SEA/AA team worked closely with Coillte to develop the FESLUP. Through workshops, multi-disciplinary discussions and land-use modelling scenarios, Coillte and the SEA/AA team were able to identify the steps needed to make each ambition a reality within the lifetime of this Plan. Once these steps were understood, they were translated into a range of plan objectives, using the appropriate approaches relevant to each pillar.

Following the SEA and AA process, and development and adoption of the FESLUP as appropriate, Coillte will prepare the first Forest Estate Strategic Implementation Plan (‘the Implementation Plan’) which will drive the delivery of this FESLUP over the shorter term (2026-2035), by taking the strategic objectives of the FESLUP and translating them into a range of implementable, measurable and geographical actions. All actions contained in the Implementation Plan will be consistent with both the FESLUP and the Strategic Vision. It is intended that the Implementation Plan will be updated every ten years.

### Proposed mitigation measures

Mitigation measures were proposed to address negative environmental impacts identified during the assessment process. A number of proposed objectives were identified as potentially resulting in a significant negative environmental impact, particularly those relating to wind energy development. In addition, the development of recreational areas may result in significant negative environmental impacts particularly relating to BIO, L&S and WAT. In addition, where increased afforestation is facilitated, significant negative impacts may particularly arise on L&S and WAT.

The SEA team worked closely with Coillte in the development of the mitigation measures outlined in the SEA ER in order to fully mitigate potential environmental effects.

### Required environmental monitoring programme

A monitoring programme has been developed based on the indicators (noted in Section 9 of the SEA ER) in order to track progress towards achieving strategic environmental objectives and reaching targets, enabling positive and negative impacts on the environment to be measured.

The indicators have been developed to illustrate changes that may be attributable to the implementation of the FESLUP.

Coillte will ensure a mid-level review is carried out by a monitoring group to track the progress of the FESLUP monitoring programme over the lifetime of the Plan.

### Consultation

Further to the SEA Scoping consultation, the SEA Environmental Report, the Natura Impact Statement (from the Appropriate Assessment Process) and the FESLUP were put on wider display on the Coillte website. A total of 20 No submissions were received as part of the consultation.

Appendix A.2 of this report sets out each of the submissions received from public bodies, as they relate to SEA only, 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 are not contained in Appendix A.2 but have nevertheless been taken into consideration.

Coillte have also prepared a Submission Response Report which summarise the key issues raised as part of the consultation and how those issues were responded to. The Submission Response Report is standalone and has been published alongside the final FESLUP.

Following the submissions made by the public to the FESLUP and FESLUP SEA Environmental Report, minor updates have been made to the FESLUP that are not considered material and do not change the outcome to the SEA Environmental Report. In addition, a number of changes were proposed by the AA process to the FESLUP, these are considered to have a positive impact on the environment and do not require further consideration.

The following minor updates have been made to the SEA Environmental Report based on the submissions (refer to Appendix A.2. for further details):

- The Non-Technical Summary was updated to include a summary of the main environmental problems associated with the baseline environment and the threats to forest habitats. Additionally, a summary of Section 5.10 Likely Evolution of the Baseline Environment in the Absence of the Implementation of the Plan of the Environmental Report was included in the Non-Technical Summary.
- The recommendations in the submissions to add reference to guidance documents, plans, programmes, policies and legislation were acknowledged and accepted into Sections 1.2.3, 3.2, 5.5, 5.7, 9.1, 9.2 and Appendix A.2.
- The SEA Environmental Report was updated to include a detailed description of the methodology used for the Sensitivity Mapping in Section 4.6 which led to the production of the Sensitivity Map in Appendix A.1 of the SEA Environmental Report.
- The submissions included recommendations to add further detail to the following sections; Section 5.5 on the water quality of coastal waters as well as a reference to the Marine Strategy and legislation, Section 5.7 on the DAFM classification of protected archaeological sites as Landscape features and ACRES objectives recognition of their habitat and biodiversity value to the environment, Section 8.4 on the competition for land between forestry and renewable energy industries, on nitrogen deposition in 9.1, and the Monitoring Table in Section 9.2 on adding a reference to additional DAERA reports.
- Lastly, minor textual changes were made to the tables in Section 6.3 and 9.1 to provide further clarity to the reader.

# Appendix A- Submissions Received

## A.1 Appendix – Scoping Responses from Environmental Authorities

Consultee/ Stakeholder	SEA Scoping Response	SEA Actions
Scoping Workshop with Consultees	The interrelationships between environmental components have been included in the SEA Environmental Report.	This comment has been updated, refer to Section 8.4 of the ER.
	Environmental sensitivity mapping has been updated to reflect comments made by Statutory Consultees during the Scoping workshop.	All environmental sensitivity weightings have been reviewed and updated in so far as possible, on the back of responses received during the Workshop. All weighting updates have since been utilised to inform the environmental sensitivity mapping included in Appendix A1 of the ER.
	Schematic has been included in the ER to detail the relationship of Coillte’s Plan and other forestry related Plans.	Updated to include, refer to Section 3.
Environmental Protection Agency (EPA)	<p>Cover letter highlighted some key environmental issues relating to forestry and also the SEA process, including:</p> <p><b>Water Quality-</b> Forestry is the third most significant pressure impacting on water quality in Ireland and there has been little net change in the relative scale of its impacts since the previous national water quality assessment. Forestry operations, particularly in legacy sites, continue to impact on water quality. Sediment losses from forestry operations in upland catchments is the most significant pressure impacting on our high-status waters. The potential impacts from forestry should also address the impacts of herbicides and pesticides on both water quality and biodiversity. Cypermethrin is one such plant-protection product and is included in the EU Priority Substances list. It is highly toxic to aquatic life, particularly to some invertebrates such as insects and crustaceans.</p> <p><b>Emissions:</b> The forestry sector is projected to become a net source of carbon emissions in the near future. Current low afforestation rates (~2,000 ha) are well below the planned 8,000 ha foreseen annually. This, combined with increased timber harvest, will lead to further reductions in the ability of our national forests to contribute to CO<sub>2</sub> emissions removals going forward. Recognising that the forestry sector is not the only CO<sub>2</sub> sink in Ireland, it plays an important role as a source of CO<sub>2</sub> removal from the atmosphere. However, there has been a noticeable reduction in the absolute value of this sink / removal activity due to the current age profile of our national forest stock.</p>	The Key Environmental issues listed have been taken into account as part of baseline environment description, as appropriate and integrated into the environmental assessment outcome, as appropriate.
	We recommend including schematics in the Programme and SEA Environmental Report, showing the links and key inter-relationships with other key relevant national, regional, sectoral and environmental Plans, e.g., River Basin Management Plans, Agri-Food Strategy to 2030, CAP Strategic Plan 2023-2027, Ireland’s Forest Strategy 2022-2030 and Ireland’s Forest Strategy Implementation Plan.	

Consultee/ Stakeholder	SEA Scoping Response	SEA Actions
	Collaborating with other key stakeholders (government departments and state agencies) will be important to align the FESLUP with national level environmental commitments set out in the National Planning Framework, Climate Action Plan, River Basin Management Plan, CAP Strategic Plan, other relevant forest Plans/Strategies etc.	This comment is welcomed. For the consideration of Coillte.
	Consider including a commitment to also support and resource awareness raising and training of the relevant stakeholders to implement the relevant guidelines and policies. Coillte should ensure that the available guidance and protocols are implemented in full within the forest sector to mitigate against forestry activities having an impact on water quality.	This comment is welcomed. For the consideration of Coillte.
	All recommendations from the SEA, including mitigation measures, should be integrated into the FESLUP. The SEA Environmental Report should include a chapter outlining how the recommendations and mitigation measures from the SEA have been incorporated into the FESLUP. We recommend that the SEA Environmental Report includes relevant summary tables outlining the key findings of the SEA and linking the significant environmental effects identified to the proposed mitigation measures, monitoring measures and recommendations.	Recommendations and Mitigation Measures of SEA have been integrated into the Plan, in so far as possible. Key findings of the SEA and the linking of significant environmental effects identified to the proposed mitigation measures, monitoring measures and recommendations have been considered and included, as appropriate.
	In finalising the FESLUP and integrating the findings of the SEA into the FESLUP, the relevant recommendations, key issues and challenges described in the SOER2020 should be taken into account.	Recommendations and key issues described in the SOER2020 have been reviewed and considered in the SEA ER, as appropriate.
	It is recommended to include a section on Monitoring, Implementation and Reporting. Ideally these should align with the Plan reviews and existing cyclical reporting. Reviewing and providing information on the previous Plan is recommended. Progress-related implementation reports are recommended as appropriate and should be aligned with environmental monitoring required under SEA legislation. Monitoring should address positive, negative and cumulative effects when they occur and should provide ongoing review to allow early response to environmental issues. This report should state monitoring frequency, responsibilities and provisions for reporting. The same indicators should be used for Plan and SEA related monitoring. An environmental working subgroup is recommended for overseeing the approach to the monitoring and reporting elements. Other Plans monitoring approaches should be considered (Offshore Renewable Energy Development Plan (OREDPA) and current arrangement for Food Vision 2030.	Section 9 of the ER contains information on Monitoring and Reporting and includes a detailed monitoring table which states monitoring frequency, responsibilities, and provisions for reporting in relation to the FESLUP. Monitoring, reporting and establishment of environmental working sub-group – for the consideration of Coillte.
	Carrying out an opportunity / constraints mapping exercise, as done for Plans such as the first Offshore Renewable Energy Development Plan, would be useful. This would help inform which broad land types or areas may be best suited to certain types or scales of development covered under the FESLUP. Such an exercise could be committed to as a specific action under FESLUP/ FESLUP Implementation Plan.	This comment is welcomed. For the consideration of Coillte
	It is suggested that a recommendation is included promoting the use of the new detailed EPA/Taillte Eireann land cover mapping information for lower-level Plans and associated environmental assessments that may arise out of implementation of the FESLUP.	This comment is welcomed.
	While the minimum consultation time is 4 weeks, given that the FESLUP is a national level Plan, we recommend that a consultation timeframe of 8-10 weeks is considered to provide for sufficient public engagement and consideration by the SEA statutory authorities.	For the consideration of Coillte.

Consultee/ Stakeholder	SEA Scoping Response	SEA Actions
	<p>Providing for a longer consultation time, may also assist the Plan and SEA Teams consider any changes to EU Legislation, such as the proposed Nature Restoration Law, Renewable Energy Directive, Soils Strategy, review of the CAFÉ Directive that may arise. In order to ensure as effective an SEA process as possible, and to ensure meaningful public/stakeholder consultation and engagement, it is important that the timing of the statutory consultations is appropriate to ensure sufficient time to incorporate the information gleaned into the FESLUP.</p>	
	<p>The final stage of the SEA process relates to the publication of an SEA Statement when the FESLUP is adopted. This statement will include information on how submissions and observations and consultation feedback made to DAFM during the SEA process have been incorporated into the FESLUP.</p>	<p>The SEA statement, when published, will include information on how submissions, observations and consultation feedback made to Coillte during the SEA process have been incorporated into the FESLUP.</p>
	<p>EPA recommend including a schematic of the forestry planning hierarchy (including any proposed new Plans, that may arise out of the FESLUP). This will help inform the level and type of engagement with other stakeholders in their own sectoral planning and land management, as well as taking account of Plans such as the National River Basin Management Plan and related integrated catchment management Plans that will be prepared.</p>	<p>A schematic has since been included in Section 3 of the ER to make reference to this comment.</p>
	<p>It would also be useful to include an additional column in Table 3.1 to summarise the relevance of the plans and programmes listed to the FESLUP.</p>	<p>An additional column has been added Table 3.1 which is now in Appendix A1 of the ER to states the relevance of each Plan to the FESLUP.</p>
	<p>High Status waters (rivers, lakes, groundwater) should be included as specific elements (with a rating of 10), reflecting their importance in terms of water quality and biodiversity, but also given that afforestation is a key pressure affecting high status water bodies nationally</p>	<p>All weightings have been reviewed and updated on the back of comments made during the statutory consultee period. High Status waters have since been included as specific elements (with a rating of 10), reflecting their importance in terms of water quality and biodiversity, also reflecting that afforestation is a key pressure affecting high status water bodies nationally. Updated environmental sensitivity mapping is included in Appendix A1 of the ER.</p>
	<p>In Table 5.1, there is also merit in describing why both “peat and river alluvium” are combined for a rating of 10. While peat, with its significance in terms of supports for climate mitigation and biodiversity is rated at 10, the reasoning behind including river alluvium and assigning it a value of 10 should be clarified. While we note the rating of 5 for “Windfarms” but consider clarifying the status of these. Do they refer to existing wind energy developments or proposed new locations? We also note that Discharge licenses assigned a value of 1, the reasoning for this should be clarified in the context of the FESLUP and associated assessment. Salmonid waters are currently assigned value of 5. There may be merits in upgrading these to 10.</p>	<p>All weightings have been reviewed and updated on the back of comments made during the statutory consultee period. Peat and River Alluvium weightings have been separated and River Alluvium into their own categories in order to inform the environmental sensitivity mapping in this SEA ER. Peat has a weighting of 10 in the updated mapping.</p>
	<p>In the peatlands subsection (p42) the National Peatlands Strategy is attributed to the EPA, rather than the NPWS, while the footnote for the reference points to a report on land use and land cover.</p>	<p>This comment has been updated in the ER.</p>
	<p>In Section 4.5 - Water, reference could be made to the recently published Water Quality in 2022 - An Indicators Report (EPA, 2023).</p>	<p>Noted. Section 5.5 of the ER “Water” has been updated on the back of this comment.</p>

Consultee/ Stakeholder	SEA Scoping Response	SEA Actions
	Regarding Section 4.8 - Landscape and visual aspects, the EPA will be publishing a guidance note on SEA and Landscape during Q3 2023. It may be useful to consider, once available, in preparing the Plan and associated SEA Environmental Report. Additionally, EPA is also involved in a research project – RELAVENT (Reframe Landscape Character Assessment), which is looking to prepare a toolkit to help landscape character assessments and is due to be completed in Q4 2023. It may also be worth considering in implementing the FESLUP.	Noted. This guidance note, once available, will be reviewed.
	Chapter 2 – The FESLUP Targets and the objectives of the FESLUP should include the objective not to cause impact on the condition of our waters.	Objective relating to water quality included in Section 6 of the ER.
	It is recommended that potential developers (many of whom are EPA licensees) are engaged in the plan-making process and SEA process in relation to the FESLUP.	The FESLUP and SEA ER will go on public display as part of the public and statutory consultation period, at which time these stakeholders are welcomed to make submissions/observations on the FESLUP and SEA ER.
	Regarding the additional lands to be acquired for increased afforestation and renewable energy, it is important to develop and set out the environmental criteria for selection of these lands and where engagement with other sectoral stakeholders is required.	This comment is welcomed. For further consideration of Coillte
	Chapter 4 – Environmental Baseline and Key Environmental Issues In Figure A1, consider clarifying the Coillte forest estate boundary on this (and other relevant maps/drawings as appropriate. Consider also showing the areas of Coillte recreational areas on the relevant figures/drawings in this scoping report.	A map has since been included in Appendix A1 of the ER displaying Coillte’s forest estate boundary across the Plan area.
	Provide an additional map in the SEA Scoping Report associated with “Land Use Change”, to identify areas for potential changes in land use over the lifetime of the Plan.	A map has been included in Appendix A1 of the SEA ER displaying Corine Landcover Dataset across the Plan area.
	Describe whether scheme such as The Native Woodland Conservation Scheme and the Neighbour Wood Scheme will be maintained and expanded upon over the lifetime of the FESLUP.	For the consideration of Coillte.
	Take the Draft Forestry and Freshwater Pearl Mussel Plan (DAFM) into account and provide an update of the status of this plan and its relationship with the FESLUP.	The Draft Forestry and Freshwater Pearl Mussel Plan (DAFM) has been taken into account throughout the duration of the SEA process. Further, for the consideration of Coillte.
	We suggest that providing for greater monitoring of the key issues, challenges and potential impacts facing biodiversity.	Refer to the detailed Monitoring Table included in Section 9 of the ER.
	SEA and Plan should take account of the latest GHG projections (including LULUCF) and should consider the change in emissions due the stand maturity.	Noted. The latest GHG projections (including LULUCF) have been included in Section 5.6.1 of this Report. Further, for the consideration of Coillte.
	The SEA should also take account of the impacts of ammonia deposition on trees, see IWM135.pdf (npws.ie) for further information.	Noted. Section 5.6.1.1 of the Report has been updated to reflect this comment.
	The Plan needs to address the issue of forestry activities on waterways and measure the trajectory towards full achievement of the Water Framework Directive objectives.	Refer to Section 6 of the ER, where Objectives, Targets and Indicators has been provided related to water and refer to Section 9 Mitigation and Monitoring which is also inclusive to the protection of water quality. Further for the consideration of Coillte.



Consultee/ Stakeholder	SEA Scoping Response	SEA Actions
	The potential impacts from forestry should also address the impacts of herbicides and pesticides on both water quality and biodiversity. In addition to monitoring for priority substances, substances of emerging concern are also included in the EPA WFD monitoring programme. These substances include those from the EU Surface Water Watch List.	The ER has since been updated to make reference to potential forestry related impacts and the impacts of herbicides and pesticides on both water quality and biodiversity, as appropriate. Refer to Section 9 Mitigation and Monitoring a section is provided for water resources.
	We recommend updating the greenhouse gas emission data to point to the most recent EPA data from April 2023. This is available at: <a href="https://www.epa.ie/our-services/monitoring--assessment/climate-change/ghg/latest-emissions-data/">https://www.epa.ie/our-services/monitoring--assessment/climate-change/ghg/latest-emissions-data/</a>	Greenhouse gas emission data has been updated in the ER to reflect the most recent data (April 2023).
	Chapter 5 – Sensitivity Mapping Use river catchments/river water bodies instead to attribute sensitivity to river water status	River water bodies have been used to attribute sensitivity to river water status in the ER.
	Considering using additional sensitivity mapping tools, such as the Environmental Sensitivity Mapping to generate additional sensitivity mapping outputs and compare the outputs with those already generated.	Noted. All weightings have been reviewed and updated on the back of comments made during the statutory consultee period and Environmental Sensitivity Mapping was updated for the ER.
	Quantifying the percentages of total area currently within each of the sensitivity categories provided.	Noted.
	Where it is envisaged that Measures proposed in the Plan will be implemented via strategies and plans, which themselves have been or may be subject to SEA, this should be explained in the SEA Environmental Report and taken into account in the assessment.	Noted- where further environmental assessment is envisaged, this has been explained in the SEA ER.
	Where specific Measures will be implemented directly, provide detail in the Environmental Report and FESLUP on the relevant environmental assessments to be carried out at lower-level planning (BAU strategic forestry plans) and project stages and relevant mitigation measures to be applied, as appropriate.	Refer to Section 9 on Mitigation and Monitoring. Both sections of the ER have been detailed to mitigate and monitor any impacts that have potential to occur as a result of the FESLUP, furthermore these sections make reference to some impacts being more adequately identified and mitigated at project and EIA level. All proposals for development will be required to have due regard to environmental considerations outlined in the SEA ER and associated AA Screening.
	Split Objectives into a smaller number of higher-level environmental protection objectives (EPOs) which seek to address the key environmental objectives, support by sub-objectives for more specific elements. EPOs should be more specific where possible	Noted. Higher-level environmental protection objectives (EPOs) have since been included in Table 6.1 of the ER. Objectives within have been updated on the back of this comment, as appropriate.
	Where possible monitoring indicators should take into account the potential impacts of the FESLUP and which monitoring indicators may be best placed to take these into account over the lifetime of the FESLUP.	These comments have been taking into consideration in the ER, as appropriate. The monitoring table in Section 9 has since been updated to include a likely significant effect column of the FESLUP in relation to each environmental component.
	In Table 6.1 – Environmental Objectives, Targets and Targets, the indicators could benefit from: Having a closer alignment between the respective targets that they measure Taking account of changes in trends in environmental status Review wording of targets and objectives	The Objectives, Indicators and Target Table in Section 6 of the report has been reviewed and updated, as appropriate. Table 6.1 has since been updated.
	Under the ‘Biodiversity, flora and fauna’ component, mention protected habitats and species related to areas of forestry, that are outside of designated areas.	Noted. Table 6.1 has since been updated as appropriate.

Consultee/ Stakeholder	SEA Scoping Response	SEA Actions
	Consider including an associated target and indicator for the Safeguard areas of prime agricultural land and designated geological sites objective.	Noted. Table 6.1 has since been updated as appropriate.
	For 'Air, Noise and Climatic Factors' criteria, consider including an indicator associated with human health to reflect the objective of "To avoid, prevent or reduce harmful effects on human health and the environment as a whole resulting from emissions to air from transport". Clarify if this objective relates to the transport of forestry products or the manufacture of wood based products from forestry.	Noted. The Objectives, Indicators and Target Table in Section 6 of this ER have been reviewed and updated accordingly in the Air, Noise and Climate Section.
	One Air-related indicator could be "Wind energy developments will only be facilitated, at suitable locations, within the context of environmentally sustainable forest management within the national forest estate." Consideration should also be given to slope stability aspects of forest siting in relation to landslide risk. It is also worth clarifying whether the SEA needs to consider the likely impacts of wind energy related development, in terms of defining siting criteria or areas open to consideration, preferred areas, areas not considered for renewable energy developments etc	Noted. The Objectives, Indicators and Target Table in Section 6 of the ER have been reviewed and updated accordingly.
	Referred to EPA guidance "Developing and Assessing Alternatives in Strategic Environmental Assessment (SEA)." The SEA could also consider examining the different scenarios under which the alternatives support achievement of the national climate objective. The reasons for selecting the alternatives considered should include a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information. Include a summary of alternative considered and justification for selection of the preferred scenario. Review EPA Guidance Practice Guidance Note on Cumulative Effects Assessment in Strategic Environmental Assessment (EPA, 2020).	Refer to Section 7 Alternatives Assessment. EPA Guidance documents have been referred to throughout the Alternatives Assessment which has been incorporated into the SEA ER.
	Requirements of the SEA protocol under the ESPOO Convention should be taken into account, for any possible transboundary consultations with non-EU Member States.	Requirements of the SEA protocol under the ESPOO Convention have been taken into account, as appropriate.
	Consult with the relevant authorities under SEA Regulations	The relevant authorities have been consulted with as part of the SEA Scoping process, and the SEA ER will be put on public display alongside the FESLUP.
	Note in chapter 7 that the scoping for the SEA is dynamic and should continue to feed into the preparation of the SEA environmental report and Plan.	Scoping has fed into the preparation of the SEA ER and Plan. All scoping responses have been reviewed and incorporated into the SEA ER as appropriate.
	Publish a SEA Statement alongside the adopted Plan summarising the how environmental considerations have been integrated into the Plan, how the environmental report and consultation comments on it have been taken into account, the reasons for choosing the Plan as adopted, in the light of the other reasonable alternatives dealt with (in the Environmental Report and the associated consultation and the measures decided concerning monitoring.	An SEA Statement will be prepared following the finalisation of the FESLUP. The SEA Statement will summarise how environmental considerations have been integrated into the Plan, how the SEA ER and consultation comments on it have been taken into account and the reasons for choosing the Plan as adopted, in the light of the other reasonable alternatives dealt with
	Refer to EPA published Guidance.	EPA Guidance documents have been referred to and incorporated throughout the SEA ER.

Consultee/ Stakeholder	SEA Scoping Response	SEA Actions
Department of the Environment, Climate and Communications (DECC)	<p>Comments on plans, programmes and legislation already listed:  LULUCF Regulation – the LULUCF Regulation was revised in 2023 for the period up to 2030.  The Land use Review – Phase 1 is now complete and was published in March 2023. Phase 2 is now due for completion in Q1 2025 with an interim report to be published in Q4 2023.  Climate Action Plan 2023 – subsequent annual CAPs will also be relevant.  Other relevant plans, programmes and legislation:  Proposal for EU Soil Health Law (draft text to be published 5<sup>th</sup> July)  Proposal for EU Carbon Removals Certification Framework  Whole of Government Circular Economy Strategy 2022-2023</p>	<p>Noted. The Plans, Programmes, Policy and Legislation section of this ER already listed, have since been updated on the back of these comments.  Noted. Other relevant Plans, Programmes, Policy and Legislation suggested have since been added.</p>
	<p>It is good to see the “Teagasc Soils – Peat and River Alluvium” included here and given a weighting of 10. Given that there are approximately 333,000 ha of grasslands on organic soils there may be further scope for using additional data sets here.</p>	<p>All environmental sensitivity weightings have been reviewed and updated in so far as possible, on the back of responses received during the Statutory Consultee period. All weighting updates have since been utilised to inform the environmental sensitivity mapping included in Appendix A1 of the ER.</p>
	<p>With reference to the below text, current DAFM policy distinguishes the permissibility of afforestation on organic soils on the basis of an assigned depth threshold in order to avoid afforestation on deep peat soils and the associated GHG emissions. While there has been research into afforestation on shallow peat soils indicating the potential for net removals, this is an area requiring significant further work in order to advocate for a generalised approach and at present still presents environmental and climate risks. We would highlight that this is an area likely to evolve in line with developments at an EU level and which may be impacted by requirements around State Aid. It is important that Coillte’s FESLUP will have the flexibility and the structures in place to be able to adapt to these and other likely developments impacting the forestry sector in Ireland.  “4.4.2 Key Issues and Opportunities:  Potential for negative impacts on land and soils where any forestry activity disturbs organic (peat) soils, including if afforestation on peat soils is facilitated and also the rewetting of peatlands and replanting within these area.”</p>	<p>This comment is welcomed. For the consideration of Coillte.</p>
	<p>It is noted that there are a large number of environmental objectives, targets and indicators and consideration might be given to further refinement with a view to ensuring that there is a clear focus on the most significant issues.</p>	<p>Noted. Table 6.1 of the ER has been updated, as appropriate.</p>
	<p>Redesign of Peatlands Forest  With reference to the below text, this is an area of significant interest to DECC and would welcome more detail as the plans for the redesign of peatlands forest develop on, for example, the measures that will be involved, the distribution of measures such as rewilding and</p>	<p>This comment is welcomed. For the consideration of Coillte.</p>

Consultee/ Stakeholder	SEA Scoping Response	SEA Actions
	<p>rewetting across the 30,000 ha cited, and the anticipated GHG emissions profiles as a result of these measures being implemented.</p> <p>2.4 Coillte's Strategic Vision</p> <p>1. Forests for Climate:</p> <p>...</p> <p>c. Redesign 30,000 ha of Peatlands Forest for climate and ecological benefits by 2050;</p> <p>Mapping</p> <p>With reference to the below text, we note the use of the CORINE Land Cover map and would encourage further engagement with the EPA and Tailte Eireann on obstacles relating to the use of the recently developed and more spatially refined Tailte Eireann and EPA Land cover map and the EPA Land use map.</p> <p>5.8 Landscape and Visual</p> <p>5.8.1 Baseline</p> <p>...</p> <p>In the absence of a national landscape character assessment, the CORINE Land Cover is used as a proxy for the purposes of landscape, refer to Figure A2 in Appendix A1.</p> <p>SEA Alternatives Process: The Scoping Report might further clarify how the considerations of alternatives will proceed given that this is an integral part of the SEA process.</p> <p>Given the high-level nature of the Plan and its geographic non-specificity, it is important that the Plan is flexible and capable of incorporating changes in a fast-moving policy and legislative landscape at national and EU level.</p> <p>SEA and AA: It's important that both of these processes inform each other as they proceed and both, in turn, inform the emerging Plan. Given the high-level nature of the Plan and the importance of the downstream plans and programmes which are to be developed subsequently, there is an opportunity for both the SEA and AA processes to anticipate future environmental assessment requirements including data requirements and to put in place mechanisms to ensure that these assessments can place in a timely and efficient manner.</p>	<p>During the preparation of GIS Mapping that was used to inform the baseline environmental of the Plan area at SEA Scoping and SEA ER stages, difficulties were encountered while attempting to utilise the EPA's most recent Landcover datasets. A number of system crashes were experienced while attempting to utilise the datasets. Hence, the use of the Corine land cover datasets have been incorporated into this ER.</p> <p>Section 4.10 of the ER has been updated to make reference to the technical difficulties encountered during the SEA process.</p> <p>Refer to Section 7 (Alternatives Considered) of the ER the alternatives have been detailed and further expanded upon in the ER.</p> <p>This comment is welcomed. For the consideration of Coillte.</p> <p>The SEA and AA processes have been undertaken as an iterative process, both of which have also informed and fed into the preparation of the FESLUP throughout its development.</p>
Geological Survey Ireland (GSI)	<p>Cover letter highlighted some key issues including:</p> <p>We recommend using data available on our website (<a href="http://www.gsi.ie/">http://www.gsi.ie/</a>), when conducting the EIAR, SEA, planning and scoping processes. Use of our data or maps should be attributed correctly to 'Geological Survey Ireland'.</p> <p>The list of our publicly available datasets that may be useful to the environmental assessment and planning process are as follows:</p> <p>Geoheritage (<a href="https://www.gsi.ie/en-ie/data-and-maps/Pages/Geoheritage.aspx">https://www.gsi.ie/en-ie/data-and-maps/Pages/Geoheritage.aspx</a>)</p> <p>Groundwater</p> <p>(<a href="https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=a30af518e87a4c0ab2fbd e2aac3c228">https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=a30af518e87a4c0ab2fbd e2aac3c228</a>)</p> <p>Geological Mapping</p> <p>(<a href="https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=a30af518e87a4c0ab2fbd e2aac3c228">https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=a30af518e87a4c0ab2fbd e2aac3c228</a>)</p>	<p>These comments are welcomed. These data sources have been reviewed and taken into consideration, as appropriate.</p>

Consultee/ Stakeholder	SEA Scoping Response	SEA Actions
	<p>Geotechnical Database Resources (<a href="http://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=a30af518e87a4c0ab2fbde2aaac3c228">http://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=a30af518e87a4c0ab2fbde2aaac3c228</a>)</p> <p>Geohazards (<a href="http://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=a30af518e87a4c0ab2fbde2aaac3c228">http://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=a30af518e87a4c0ab2fbde2aaac3c228</a>)</p> <p>Natural Resources (Mineral/Aggregates) (<a href="https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=a30af518e87a4c0ab2fbde2aaac3c228">https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=a30af518e87a4c0ab2fbde2aaac3c228</a>)</p> <p>Geochemistry of soils, surface waters and sediments (<a href="https://www.gsi.ie/en-ie/data-and-maps/Pages/Geochemistry.aspx">https://www.gsi.ie/en-ie/data-and-maps/Pages/Geochemistry.aspx</a>)</p> <p>Geophysical data (<a href="http://www.gsi.ie/tellus">http://www.gsi.ie/tellus</a>)</p> <p>Historic Mines (<a href="https://www.epa.ie/publications/monitoring--assessment/assessment/historic-mine-sites---inventory-and-risk-classification-volume-1.php">https://www.epa.ie/publications/monitoring--assessment/assessment/historic-mine-sites---inventory-and-risk-classification-volume-1.php</a>)</p> <p>Marine and Coastal Unit (<a href="https://www.gsi.ie/en-ie/programmes-and-projects/marine-and-coastal-unit/projects/Pages/default.aspx">https://www.gsi.ie/en-ie/programmes-and-projects/marine-and-coastal-unit/projects/Pages/default.aspx</a>.)</p> <p>National Coastal Change Assessment (<a href="https://www.gsi.ie/en-ie/programmes-and-projects/marine-and-coastal-unit/projects/Pages/Coastal-Vulnerability-Index.aspx">https://www.gsi.ie/en-ie/programmes-and-projects/marine-and-coastal-unit/projects/Pages/Coastal-Vulnerability-Index.aspx</a>)</p> <p>Physiographic Units (<a href="https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=a30af518e87a4c0ab2fbde2aaac3c228">https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=a30af518e87a4c0ab2fbde2aaac3c228</a>)</p>	
DAERA	<p>Cover letter highlighted some key environmental issues including: DAERA would like the SEA Environmental Report to contain a clear statement indicating the opinion about whether or not the implementation of the strategy is likely to have a significant effect on the environment of Northern Ireland, in combination with any identified measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment</p> <p>Consideration with regards to HRA should assess direct and indirect effects on designated sites including potential emissions and hydrological links to include any potential impacts to National Site Network (NSN) sites within Northern Ireland that may be impacted by the FESLUP and we look forward to commenting on this</p> <p>Question 1 It may be worth including in your considerations the following: The Wildlife (NI) Order 1985 (as amended) Wildlife and Natural Environment Act (NI) 2011</p>	<p>The assessment of significant effects outlined in Section 8.2 – Section 8.4 of this ER report also takes regard for transboundary effects of the FESLUP on Northern Ireland. Where there is potential for any significant effects to occur, potential impacts have been detailed within Section 8.2 – Section 8.4 of the ER, the potential for transboundary effects between the Republic of Ireland and Northern Ireland have also been considered throughout the assessment process. Refer to Section 8 of the ER for further detail and Section 5 of the ER for transboundary baselines against each environmental component. Refer to Section 9 for Mitigation and Monitoring measures set in place for any significant effects envisaged from the FESLUP.</p> <p>Noted. Transboundary effects on NI have been considered, as appropriate in Section 8 of this report and transboundary baselines have also been included throughout the entirety of Section 5 of the report.</p> <p>These Plans have been reviewed and consideration has been given to the suggested Plans, as appropriate. The websites detailed have also been reviewed and used to inform the transboundary baseline in the ER, as appropriate.</p>

Consultee/ Stakeholder	SEA Scoping Response	SEA Actions
	<p>The Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 (as amended)  The Environment (NI) Order 2002  The Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2017  The Strategic Planning Policy Statement (SPPS) for Northern Ireland  Planning Policy Statements (PPS – in particular PPS2). It should be noted that the PPS’s will be superseded by Local Development Plans when they are adopted.  Biodiversity Strategy for NI to 2020 <a href="https://www.daera-ni.gov.uk/publications/biodiversity-strategy-northern-ireland-2020-0">https://www.daera-ni.gov.uk/publications/biodiversity-strategy-northern-ireland-2020-0</a>  Draft Environment Strategy <a href="https://www.daera-ni.gov.uk/consultations/esni-public-discussion-document">https://www.daera-ni.gov.uk/consultations/esni-public-discussion-document</a>  The Draft NI peatland policy: <a href="https://www.daera-ni.gov.uk/consultations/ni-peatland-strategy-consultation">https://www.daera-ni.gov.uk/consultations/ni-peatland-strategy-consultation</a>.  The Draft Green Growth Strategy Consultation on the draft Green Growth Strategy for Northern Ireland   Department of Agriculture, Environment and Rural Affairs (daera-ni.gov.uk)  Northern Ireland Energy Strategy 2050 Northern Ireland Energy Strategy 2050   Department for the Economy (economy-ni.gov.uk)  A number of useful information sources that highlight the current state of the environment in Northern Ireland at a regional level and which could be referenced are:  Northern Ireland State of the Environment Reports: <a href="https://www.daera-ni.gov.uk/publications/state-environment-report-2013">https://www.daera-ni.gov.uk/publications/state-environment-report-2013</a>  Northern Ireland Environmental Statistics Reports: <a href="https://www.daera-ni.gov.uk/articles/northern-ireland-environmental-statistics-report">https://www.daera-ni.gov.uk/articles/northern-ireland-environmental-statistics-report</a>  Other relevant web-links are;  Designated Scientific Sites: <a href="http://www.daera-ni.gov.uk/landing-pages/protected-areas">www.daera-ni.gov.uk/landing-pages/protected-areas</a>  Regional Landscape Character Map viewer: <a href="https://www.daera-ni.gov.uk/services/regional-landscape-character-areas-map-viewer">https://www.daera-ni.gov.uk/services/regional-landscape-character-areas-map-viewer</a>  DAERA have a map browser for NI protected sites and known priority habitat: <a href="http://www.daera-ni.gov.uk/services/natural-environment-map-viewer">www.daera-ni.gov.uk/services/natural-environment-map-viewer</a>  Our natural environment datasets are available at the link below: <a href="http://www.daera-ni.gov.uk/articles/download-digital-datasets">www.daera-ni.gov.uk/articles/download-digital-datasets</a></p>	
	<p>Question 2  Transboundary issues arising from this plan should be considered as part of the forthcoming SEA including the potential disturbance to/impact on NI/RoI migratory/mobile species. Consideration should be given to all potential impacts on NI habitats (particularly designated sites, priority habitats and those important for migratory species and NI populations) including habitat quality and conservation status.</p>	<p>The assessment of significant effects outlined in Section 8.2 – Section 8.4 of the ER report also takes regard for transboundary effects of the FESLUP on Northern Ireland. Where there is potential for any significant effects to occur, potential impacts have been detailed within Section 8.2 – Section 8.4 of the ER, the potential for transboundary effects between the Republic of Ireland and Northern Ireland have also been considered throughout the assessment process. Refer to Section 8 of the ER for further detail and Section 5 of the ER for transboundary baselines against each environmental component. Refer to Section 9 for Mitigation and Monitoring measures set in place for any potential significant effects envisaged from the FESLUP.</p>

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	<p>NED requires more detailed information to be included within the ER, particularly as to the distances used for the transboundary baseline and any impacts that may arise from the plan. NED would consider a buffer of 15km to be a standard buffer for inclusion in any analysis.</p>	<p>Section 5 of the ER details transboundary baselines against each environmental component, as appropriate. The purpose of the FESLUP is to support the implementation of Coillte’s Strategic Vision and the policies and ambitions of Coillte by providing a long-term strategic planning framework for the development of the forest estate. The FESLUP does not set out criteria to determine land suitability for any development and or projects, this will be done as part of the Implementation Plan phase.</p>
	<p>NED notes that in the same section that the baseline has only included designated sites within Northern Ireland. Other environmental effects may occur in NI due to the FESLUP and these should be taken into account in the ER. Priority habitats, river basins, and other landscape types also require special attention as ecological functionality and ‘views’ of landscape cross political boundaries.</p>	<p>Section 5 of the ER details transboundary baselines against each environmental component, as appropriate. The assessment of significant effects outlined in Section 8.2 – Section 8.4 of the ER report also takes regard for transboundary effects of the FESLUP on Northern Ireland. Where there is potential for any significant effects to occur, potential effects have been detailed within Section 8.2 – Section 8.4 of the ER, the potential for transboundary effects between the Republic of Ireland and Northern Ireland have also been considered throughout the assessment process. Refer to Section 8 of the ER for further detail and Section 5 of the ER for transboundary baselines against each environmental component. Refer to Section 9 for Mitigation and Monitoring measures set in place for any significant effects envisaged from the FESLUP.</p>
	<p>In the section on Land and soils at 4.4.2, p 44, the following issues have been highlighted:  Potential for negative impacts to land and soil during new development, for example such as wind farm development and or the construction of new forest roads to transport wood materials;  Potential for negative impacts on wet soils, particularly peats, that can become badly compacted by machine passage;  Potential for landslides particularly in deep peats;  Potential for negative impacts on land and soils where any forestry activity disturbs organic (peat) soils, including if afforestation on peat soils is facilitated and also the rewetting of peatlands and replanting within these areas.  Compaction of soil during the construction of roads has the potential to result in changes to the physical and chemical properties of soil that may have detrimental effects on soil biodiversity and lead to increased surface run-off, flooding, erosion and transport of nutrients and agrochemicals to open water;  NED would consider that there is a possibility for implications for the environment in NI by changing peatland habitat type and potentially releasing greenhouse gasses. Potential transboundary issues with this regard should also be addressed at project level and engagement with NI authorities sought should potential transboundary issues arise. Consideration should be given to the habitat condition as a whole i.e., on both sides of the border as the condition may vary across the habitat.</p>	<p>The assessment of significant effects outlined in Section 8.2 – Section 8.4 of the ER report also takes regard for transboundary effects of the FESLUP on Northern Ireland. Where there is potential for any significant effects to occur, potential effects have been detailed within Section 8.2 – Section 8.4 of the ER, the potential for transboundary effects between the Republic of Ireland and Northern Ireland have also been considered throughout the assessment process. Refer to Section 8 of the ER for further detail and Section 5 of the ER for transboundary baselines against each environmental component. Refer to Section 9 for Mitigation and Monitoring measures set in place for any significant effects envisaged from the FESLUP. Section 9 of the ER has been detailed to mitigate and monitor any impacts that have potential to occur as a result of the FESLUP, furthermore these sections make reference to some impacts being more adequately identified and mitigated at project and EIA level.  All proposals for development will be required to have due regard to environmental considerations outlined in the SEA ER and associated AA Screening.</p>



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	<p>Question 3 Transboundary issues arising from this plan should be considered as part of the forthcoming SEA including the potential disturbance to/impact on NI/RoI migratory/mobile species. Consideration should be given to all potential impacts on NI habitats (particularly designated sites, priority habitats and those important for migratory species and NI populations) including habitat quality and conservation status. Considerations with regard to HRA should assess direct and indirect effects on designated sites including potential emissions and hydrological links to include any potential impacts to NSN sites within Northern Ireland that may be impacted by the FESLUP and we look forward to commenting on this. We would reiterate that the results of the screening and any resulting AA should be included along with the final Environmental Report (ER).</p>	<p>Noted. Please refer to SEA action of Question 2 above. Noted. The assessment of significant effects outlined in Section 8.2 – Section 8.4 of the ER report also takes regard for transboundary effects of the FESLUP on Northern Ireland. Where there is potential for any significant effects to occur, potential effects have been detailed within Section 8.2 – Section 8.4 of the ER, the potential for transboundary impacts between the Republic of Ireland and Northern Ireland have also been considered throughout the assessment process. Refer to Section 8 of the ER for further detail and Section 5 of the ER for transboundary baselines against each environmental component. Refer to Section 9 for Mitigation and Monitoring measures set in place for any significant effects envisaged from the FESLUP. Any resulting AA will go on public display alongside the SEA ER and Plan.</p>
	<p>Question 4 NED has no comment to make regarding anything that should be excluded from the SEA Environmental Report</p>	<p>Noted. This comment is welcomed.</p>
	<p>Question 5 NED considers that the Objectives, Targets, and Indicators are adequate to deliver a plan of this nature.</p>	<p>This comment is welcomed.</p>
	<p>Water Management Unit The SEA should consider any potential transboundary issues in relation to the aquatic environment during all aspects / phases in relation to the implementation of Coillte’s Forest Estate Strategic Land Use Plan (FESLUP). This includes (but not limited to) the potential disturbance to/impact on NI/RoI migratory/mobile species such as salmon. Such species rely on, and can be impacted by, water quality and water resource issues. The SEA should clearly state whether, or not, any potential impacts to the aquatic environment have been identified and the nature of those impacts.</p>	<p>Noted. The assessment of significant effects outlined in Section 8.2 – Section 8.4 of the ER report also takes regard for transboundary effects of the FESLUP on Northern Ireland. Where there is potential for any significant effects to occur, potential effects have been detailed within Section 8.2 – Section 8.4 of the ER, the potential for transboundary effects between the Republic of Ireland and Northern Ireland have also been considered throughout the assessment process. Refer to Section 8 of the ER for further detail and Section 5 of the ER for transboundary baselines against each environmental component. Refer to Section 9 for Mitigation and Monitoring measures set in place for any significant effects envisaged from the FESLUP.</p>
	<p>Water Management Unit notes it can find no specific mention of Northern Ireland’s River Basin Management Plans. River Basin Management Plans are the key tools for implementing the Water Framework Directive and to achieving its objectives. Water Management Unit recommends these are considered during the SEA process. DAERA has published the Draft River Basin Management Plan for the 3rd cycle period which runs from 2021-2027 which should also be considered as part of the assessment.</p>	<p>This comment has been noted and taken into consideration, as appropriate. The assessment of significant effects outlined in Section 8.2 – Section 8.4 of the ER report also takes regard for transboundary effects of the FESLUP on Northern Ireland. Where there is potential for any significant effects to occur, potential effects have been detailed within Section 8.2 – Section 8.4 of the ER, the potential for transboundary effects between the Republic of Ireland and Northern Ireland have also been considered throughout the assessment process. Refer to Section 8 of the ER for further detail and Section 5 of the ER for transboundary</p>

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		baselines against each environmental component. Refer to Section 9 for Mitigation and Monitoring measures set in place for any significant effects envisaged from the FESLUP.
	A number of useful information sources are available that highlight the current state of the environment in Northern Ireland at a regional level which could be referenced including the Northern Ireland Environmental Statistics Report the latest of which currently is dated May 2023. (It is important that the most up to date information is used).	Noted. These data sources have been reviewed.
	Where adverse impacts on the aquatic environment are identified during the SEA process, relevant and appropriate mitigation measures should be proposed. In addition, monitoring regimes should be identified (including where feasible, consideration of the frequency of monitoring, appropriate analysis, and reporting) to ensure both the efficacy of those mitigation measures and identify any unforeseen impacts to the aquatic environment that may arise from implementation of FESLUP.	Refer to Section 9 of the ER for Mitigation and Monitoring. Both sections of the ER have been detailed to mitigate and monitor any impacts that have potential to occur as a result of the FESLUP, a specific section for water has been detailed. Section 9.3 of the ER contains information on Monitoring and Reporting and includes a detailed monitoring table which states monitoring frequency, responsibilities, and provisions for reporting in relation to the FESLUP, a specific section for water has been detailed.
	Air Quality and Biodiversity Unit Comments In Table 6.1 (SEA Objectives Indicators and Targets), 'Air and Climate', reference could be made to wood burning (biomass/renewables) and the impact that this may have on local air quality. There is reference made in Section 4.6.6.1 of burning wood with moisture content <25% in order to comply with Ecodesign standards. Is this something that can be part of an SEA objective?	These comments have been taken into consideration and Table 6.1 has since been updated, as appropriate.
	Drinking Water Inspectorate Comments The following is a list of additional documentation which we deem relevant to the scope of the Plan for inclusion, particularly in the consideration of transboundary issues: The Private Water Supplies Regulations (Northern Ireland) 2017; The Water and Sewerage Services (Northern Ireland) Order 2006; The Water Supply (Water Quality) Regulations (Northern Ireland) 2007; The Drinking Water Directive (98/83/EC); and, The Drinking Water Directive Recast (2020/2184).	The suggested Plans have been acknowledged. Transboundary effects have been taken into consideration throughout the ER whereby, the assessment of significant effects outlined in Section 8.2 – Section 8.4 of the ER report also takes regard for transboundary effects of the FESLUP on Northern Ireland. Where there is potential for any significant effects to occur, potential impacts have been detailed within Section 8.2 – Section 8.4 of the ER, the potential for transboundary effects between the Republic of Ireland and Northern Ireland have also been considered throughout the assessment process. Refer to Section 8 of the ER for further detail and Section 5 of the ER for transboundary baselines against each environmental component. Refer to Section 9 for Mitigation and Monitoring measures set in place for any significant effects envisaged from the FESLUP.
	Within Table 5.1, DWI believe there should be the inclusion of Drinking Water Protected Areas, both surface and groundwater.	This comment is welcomed and the inclusion of Drinking Water Protected Areas, both surface and groundwater (with a weighting of 10) have since been updated and included within the Environmental Sensitivity Mapping of the ER. Refer to Appendix A1 of the ER for relevant mapping.

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	<p>Marine and Fisheries Division Response It is suggested that marine policy, legislation, plans and programmes be included within this section. From a transboundary perspective this includes The Marine and Coastal Access Act 2009, The Marine (Northern Ireland) Act 2013, The UK Marine Policy Statement 2011, The draft Marine Plan for Northern Ireland The Towards an Integrated Coastal Zone Management Strategy for Northern Ireland 2006-2026.</p>	<p>The suggested Plans have been acknowledged. Transboundary impacts have been taken into consideration throughout the ER whereby, the assessment of significant effects outlined in Section 8.2 – Section 8.4 of the ER report also takes regard for transboundary effects of the FESLUP on Northern Ireland. Where there is potential for any significant effects to occur, potential impacts have been detailed within Section 8.2 – Section 8.4 of the ER, the potential for transboundary effects between the Republic of Ireland and Northern Ireland have also been considered throughout the assessment process. Refer to Section 8 of the ER for further detail and Section 5 of the ER for transboundary baselines against each environmental component. Refer to Section 9 for Mitigation and Monitoring measures set in place for any significant effects envisaged from the FESLUP.</p>
	<p>Given the hydrological linkages of lakes, rivers and the sea and the acknowledgement that there is potential for transboundary issues relating to water quality, it is suggested the Water component within this section draws out the relationship between forestry and the Marine Strategy Framework Directive (MSFD) and the achievement of good environmental status. This would provide transparency, link with the SEA Objectives chapter and support any future conclusions regarding likely significant transboundary marine effects</p>	<p>Noted. Transboundary impacts have been taken into consideration throughout the ER whereby, the assessment of significant effects outlined in Section 8.2 – Section 8.4 of the ER report also takes regard for transboundary impacts of the FESLUP on Northern Ireland. Where there is potential for any significant effects to occur, potential impacts have been detailed within Section 8.2 – Section 8.4 of the ER, the potential for transboundary impacts between the Republic of Ireland and Northern Ireland have also been considered throughout the assessment process. Refer to Section 8 of the ER for further detail and Section 5 of the ER for transboundary baselines against each environmental component. Refer to Section 9 for Mitigation and Monitoring measures set in place for any significant effects envisaged from the FESLUP.</p>
	<p>The Northern Ireland Seascape Character Assessment Northern Ireland Regional Seascape Character Assessment   Department of Agriculture, Environment and Rural Affairs (daera-ni.gov.uk) should be included within the Transboundary Baseline under the Landscape and Visual section. It is recommended that seascape is considered within the SEA objectives, targets and indications for Landscape and Visual.</p>	<p>Landscape Character Assessments (LCA) will be considered in detail at site specific and or project level. Refer to Mitigation in Section 9 of the report.</p>
	<p>MCR With regards to the proposals in close proximity to Lough Foyle and Carlingford Lough we recommend the following Plans to be considered The Marine and Coastal Access Act 2009 The Marine Strategy regulations 2010 Marine Policy Statement 2011 The draft Marine Plan for Northern Ireland (consultation 2018) Wildlife (Northern Ireland) Order 1985 Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995</p>	<p>Transboundary impacts have been taken into consideration throughout the ER whereby, the assessment of significant effects outlined in Section 8.2 – Section 8.4 of the ER report also takes regard for transboundary effects of the FESLUP on Northern Ireland. Where there is potential for any significant effects to occur, potential impacts have been detailed within Section 8.2 – Section 8.4 of the ER, the potential for transboundary effects between the Republic of Ireland and Northern Ireland have also been considered throughout the assessment process. Refer to</p>

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	<p>Marine Act (Northern Ireland) 2013  Strategic Planning Policy Statement for Northern Ireland 2015  An Integrated Coastal Zone Management Strategy for Northern Ireland 2006-2026</p>	<p>Section 8 of the ER for further detail and Section 5 of the ER for transboundary baselines against each environmental component. Refer to Section 9 for Mitigation and Monitoring measures set in place for any significant effects envisaged from the FESLUP.</p>
	<p>In Table 5.1 Marine Conservation Branch advise that DAERA’s Marine Map Viewer can be used as a data source for Marine Protected Areas (MPAs), Seascape, historic monuments and other transboundary datasets. In addition, data on Northern Ireland’s priority Species can be found here: <a href="https://www.daera-ni.gov.uk/publications/list-northern-ireland-priority-species-2023">https://www.daera-ni.gov.uk/publications/list-northern-ireland-priority-species-2023</a>  Furthermore, we advise that MCZs, ASSIs, Ramsar Sites and Regional Seascape Character Areas should be included in the table.</p>	<p>Transboundary impacts have been taken into consideration throughout this ER whereby, the assessment of significant effects outlined in Section 8.2 – Section 8.4 of the ER report also takes regard for transboundary effects of the FESLUP on Northern Ireland. Where there is potential for any significant effects to occur, potential impacts have been detailed within Section 8.2 – Section 8.4 of the ER, the potential for transboundary effects between the Republic of Ireland and Northern Ireland have also been considered throughout the assessment process. Refer to Section 8 of the ER for further detail and Section 5 of the ER for transboundary baselines against each environmental component. Refer to Section 9 for Mitigation and Monitoring measures set in place for any significant effects envisaged from the FESLUP. Further, Landscape Character Assessments will be considered in detail at site specific and or project level. Refer to Mitigation in Section 9 of the report.  The comments related to MCZs, ASSIs, and Ramsar Sites have been taken into consideration and reviewed, however, based on the available Ramsar Site data, there are only point reference file that highlights the general area of these sites; which is a mixture of SPAs, SAC, etc. and these are already included in the Environmental Sensitivity Mapping.</p>
	<p>In Figure A4: Designated Sites in the Republic of Ireland and Northern Ireland, we welcome the inclusion of SACs, SPAs and ASSIs but recommends also including MCZs and Ramsar Sites.</p>	<p>These comments have been taken into consideration. However, based on the available Ramsar Site data there are only point reference file that highlights the general area of these site; which is a mixture of SPAs, SAC, etc and these are already included in the Environmental Sensitivity Mapping.</p>
	<p>In Section 4.3.1.4 Transboundary baseline for Northern Ireland we advise the following edits:  There are 58, not 57, SACs  The North Channel pSAC is the North Channel SAC  Along with Carlingford Lough MCZ there are four other MCZs: Strangford Lough MCZ, Outer Belfast Lough MCZ, Waterfoot MCZ and Rathlin MCZ</p>	<p>Noted. The transboundary baseline section for Northern Ireland has been updated on the back of this comment in the ER.</p>
	<p>In Section 4.3.2 Marine Conservation Branch advise considering marine species where developed is occurring in coastal or hydrologically linked locations as construction may cause marine pollution, excessive nutrients and increased sedimentation.</p>	<p>Transboundary impacts have been taken into consideration throughout the ER whereby, the assessment of significant effects outlined in Section 8.2 – Section 8.4 of the ER report also takes regard for transboundary effects of the FESLUP on Northern Ireland.  Where there is potential for any significant effects to occur, potential impacts have been detailed within Section 8.2 – Section</p>

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		8.4 of the ER, the potential for transboundary effects between the Republic of Ireland and Northern Ireland have also been considered throughout the assessment process. Refer to Section 8 of the ER for further detail and Section 5 of the ER for transboundary baselines against each environmental component. Refer to Section 9 for Mitigation and Monitoring measures set in place for any significant effects envisaged from the FESLUP.
	In Section 4.2.2, we recommend including the potential impacts to Seascapes, particularly where renewable energy developments are planned near the coast. In Section 4.8 Marine Conservation Branch recommend considering Seascape.	Landscape Character Assessments (LCA) will be considered in detail at site specific and or project level. Refer to Mitigation in Section 9 of the report.
	Marine Conservation Branch advise the following screening distances for coastal developments: All SACs within 100km of the project should be screened for Grey seals ( <i>Halichoerus grypus</i> ) All SACs within 50km should be screened for Harbour seals ( <i>Phoca vitulina</i> ) All SACs within 100km should be screened for Harbour porpoise ( <i>Phocoena phocoena</i> )	These comments will be taken into considered, as appropriate. However, the FESLUP does not set out criteria to determine land suitability for any development and or projects, this will be done as part of the Implementation Plan phase. Section 9 of the ER has been detailed to mitigate and monitor any impacts that have potential to occur as a result of the FESLUP, furthermore these sections make reference to some impacts being more adequately identified and mitigated at project and EIA level. All proposals for development will be required to have due regard to environmental considerations outlined in this SEA ER and associated AA Screening.
	Marine Conservation Branch recommend including Regional Seascape Character Areas: Northern Ireland Regional Seascape Character Assessment 2014	Landscape Character Assessments (LCA) will be considered in detail at site specific and or project level. Refer to Mitigation in Section 9 of the report.
Department for Communities (Historic Environmental Division (HED))	Cover letter highlighted some key environmental issues including: Many heritage assets are located near the border area including some historic parks and gardens, and historic landscapes and routeways, which can be traverse . In taking forward the plan, which will guide geographical areas, HED's historic environment datasets and evidence bases should therefore be comprehensively utilized to inform decision making.	Noted. These comments have been taken into account in the ER, as appropriate. Transboundary impacts have been taken into consideration throughout the ER whereby, the assessment of significant effects outlined in Section 8.2 – Section 8.4 of the ER report also takes regard for transboundary effects of the FESLUP on Northern Ireland. Where there is potential for any significant effects to occur, potential impacts have been detailed within Section 8.2 – Section 8.4 of the ER, the potential for transboundary effects between the Republic of Ireland and Northern Ireland have also been considered throughout the assessment process. Refer to Section 8 of the ER for further detail and Section 5 of the ER for transboundary baselines against each environmental component. Refer to Section 9 for Mitigation and Monitoring measures set in place for any significant effects envisaged from the FESLUP.
	Question 1	Transboundary impacts have been taken into consideration throughout the ER whereby, the assessment of significant effects outlined in Section 8.2 – Section 8.4 of the ER report also takes

Consultee/ Stakeholder	SEA Scoping Response	SEA Actions
	<p>With reference to Table 3.1 p. 10 under Archaeological and Cultural Heritage, the relevant Plans and Strategies relating to the historic environment in Northern Ireland are outlined below:</p> <p>Conventions Convention for the Protection of the Archaeological Heritage of Europe (revised) (Valletta, 1992)</p> <p>Legislation Planning Act (Northern Ireland) 2011 Historic Monuments and Archaeological Objects (Northern Ireland) Order 1995 Regional Strategies and policies Regional Development Strategy 2035 (infrastructure-ni.gov.uk) - Spatial strategy for Northern Ireland Archaeology 2030 - A Strategic Approach for Northern Ireland.pdf (nihheritagedelivers.org) The Strategic Planning Policy Statement , Paragraphs 6.1-6.30 outlines the strategic planning policy around heritage assets in Northern Ireland. Chapters relating to Renewable and Low Carbon Energy Paragraphs 6.214 – 6.234 are currently under review. Public consultation documents are available to view at: Review of Regional Strategic Planning Policy on Renewable and Low Carbon Energy - Public Consultation   Department for Infrastructure (infrastructure-ni.gov.uk).</p> <p>Guidance HED has also now published its ‘Conservation Principles’ - a best practice conservation framework for all aspects of decision making affecting our historic environment. Conservation Principles guidance   Department for Communities (communities-ni.gov.uk)</p>	<p>regard for transboundary effects of the FESLUP on Northern Ireland. Where there is potential for any significant effects to occur, potential impacts have been detailed within Section 8.2 – Section 8.4 of the ER, the potential for transboundary effects between the Republic of Ireland and Northern Ireland have also been considered throughout the assessment process. Refer to Section 8 of the ER for further detail and Section 5 of the ER for transboundary baselines against each environmental component. Refer to Section 9 for Mitigation and Monitoring measures set in place for any significant effects envisaged from the FESLUP.</p>
	<p>Question 2 We recommend our datasets and evidence bases are fully utilized and interrogated to inform sensitivity mapping around the border region. We recommend that these datasets inform updates to Chapter 4.7.1.1 Historic Environment datasets available at: <a href="https://www.communities-ni.gov.uk/publications/historic-environment-digital-datasets">https://www.communities-ni.gov.uk/publications/historic-environment-digital-datasets</a></p>	<p>Noted. These comments have been reviewed and taken into consideration, as appropriate.</p>
	<p>We also note that not all the identified heritage assets are designated – see HED definition of a designated heritage asset ‘A World Heritage Site, State Care Monument, Scheduled Monument, Area of Significant Archaeological Interest, Listed Building, Conservation Area, Area of Townscape/Village Character, Local Landscape Policy Area or Protected Wreck Site.’ Glossary of conservation terms   Department for Communities (communities-ni.gov.uk)</p>	<p>Noted. Section 5.7.1 of the ER has been updated on the back of this comment.</p>
	<p>Question 3 UNESCO awarded global geopark status to Northern Ireland's Mourne Gullion Strangford in May 2023. This is now the second global geopark in NI and borders with RoI around South Armagh. Local Councils in Northern Ireland are also in the process of taking forward Local Development Plans for their council areas, as part of a two stage process (Plan Strategy, and Local Policies Plan). Engagement with relevant border councils is therefore recommended.</p>	<p>This comment is welcomed. For the consideration of Coillte.</p>

Consultee/ Stakeholder	SEA Scoping Response	SEA Actions
	<p>Question 5 Objective 1: Suggest: Protect, and conserve and where possible enhance the cultural heritage, including the built historic environment and setting; archaeological recorded and unrecorded monuments, architectural (Protected Structures, Architectural Conservation Areas, vernacular buildings, materials and urban fabric) and manmade historic landscape features (e.g. field walls, footpaths, gate piers etc.) within and surrounding Coillte’s forest estate.</p>	Objective 1, has been updated on the back of this comment.
DHLGH	<p>Cover letter highlighted some key environmental issues including: Archaeology Section 3.2 Relationship with Other Relevant Plans, Programmes and Legislation, Heritage Ireland 20230: A Framework for Heritage, (Dept. of Housing, Local Government and Heritage, 2022), would also be of relevance. In particular please note action 75 on page 67 of the plan, which states, ‘Work with custodians of heritage in protecting the heritage in their care.’</p>	Appendix A1 has since been updated on the back of this comment.
	<p>The National Monuments Service participated in a series of meetings (which ended in 2016) with Coillte staff and archaeologist on the staff of the Forest Service, Department of Agriculture, Food and the Marine, during which the process for Environmental Risk Assessment of forestry activities for Archaeology and Cultural Heritage was agreed. There was some discussion at these meetings about the usefulness of an inventory of archaeological monuments on the Coillte Estate. 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 the types, condition and level of statutory protection (under National Monuments legislation), of all archaeological monuments on the Estate.</p>	These comments are welcomed. For the consideration of Coillte.
	<p>Nature Conservation The Department would draw attention to our submission made on the Forest Strategy Implementation Plan Draft for public consultation dated 2 December 2022. Many of the comments made in that submission are relevant to the proposed FESLUP and the Department would advise that this is also referred to by Coillte and the SEA Team when determining the content of the proposed plan and the scope of the Environmental Report.</p>	This submission has been reviewed and taken into consideration during the preparation of the SEA ER, as appropriate.
	<p>Addressing legacy-related impacts on biodiversity It is recommended that the proposed FESLUP and the SEA process and associated documentation address the need for the environmental baseline to reflect current forest estate biodiversity issues and to comprehensively address environmental problems and sensitivities. This will allow objectives to be developed to address “legacy issues” of forestry in inappropriate locations or in sensitive ecological habitats.</p>	These comments are welcomed. A section detailing legacy issues has since been included within the FESLUP.



Consultee/ Stakeholder	SEA Scoping Response	SEA Actions
	<p>Page 30 of the SEA Scoping report in relation to “Reforestation” states “at present, any felling that takes place in Ireland has to be followed by reforestation under the Forestry Act 2014”. The Department’s understanding is that exceptions to this requirement can be made for environmental reasons (section 19(1),(c)(iv) of the 2014 Act, to mitigate a threat to a habitat or other important environmental resource). It is recommended that this is noted in the text and not allowed be an excuse or cover for inaction.</p>	
	<p>Need for objectives and criteria to maximize biodiversity gain through afforestation. It is noted that the objectives to plant 100,000ha of forestry by 2050 has potential to impact severely on other high nature value habitats. It may be beneficial for biodiversity in cases where it may replace areas of low ecological value but in the absence of qualifying criteria beyond compliance with statutory requirements, it is a missed opportunity to create real biodiversity gain. Opportunity exists here to create preferential areas for afforestation, which for native broadleaf species, should be cleared areas which may appear as native woodland on historic OS maps and, for conifer plantation, could include grassland low in biodiversity value away from sites important for wildfowl. Conversely, there may also need to be areas deemed unfavourable for afforestation, the identification of which should go beyond merely not breaching the nature Directives.</p>	<p>These comments are welcomed. To be further considered by Coillte.</p>
	<p>Need to address conflicting objectives and the process as to how these will be resolved. It is recommended that clear procedures are described in proposed FESLUP and the SEA process and associated documentation to address the process for balancing the economic need for afforestation against the need to avoid impacting on high nature value areas. Currently, it would appear that there is a reliance on statutory planning processes but there is a need to set out a clear process using objective criteria when addressing the prioritisation and selection of sites.</p>	<p>Section 3 of the FESLUP discusses how the multiple themes or pillars - i.e., Forests for Nature, Forests for Climate, Forests for Wood and Forests for People have been balanced.</p>
	<p>It is understood that the proposed FESLUP, will identify, at a strategic level, criteria, which will be used to determine what areas in Coillte ownership will be suitable for renewable energy projects, and what areas will not be suitable. Again, the use of clear objective criteria used within a transparent decision-making process will provide clarity for all plans and projects arising from this proposed plan and avoid unnecessary expense and delays on pursuing projects where environmental impacts are likely.</p>	<p>The purpose of the FESLUP is to support the implementation of Coillte’s Strategic Vision and the policies and ambitions of Coillte by providing a long-term strategic planning framework for the development of the forest estate. The FESLUP does not set out criteria to determine land suitability for renewable energy projects. This will be done as part of the Implementation Plan phase</p>

## A.2 Appendix – Submissions from Public Bodies on FESLUP (As they relate to the SEA Only)

Consultation feedback	Organisation/ Individual	Recommendation/ Response
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
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 Resource. It is recommended that a commitment is made to update these guidance documents.	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.
p52 It is noted that there is reference to the Draft Plan for Forests & Freshwater Pearl Mussel in Ireland Requirements. 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.
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.
SEA Environmental Report 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.

<p>p21 EU Forest Strategy for 2030: 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 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).</p>	<p>Department of Housing, Local Government and Heritage</p>	<p>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.</p>
<p>p129 Table 9.1- Proposed Mitigation Measures and Page 53 of the Draft FESLUP.  Aspect= General: 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: "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".  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: "Any new Projects or Plans arising from the implementation of draft FESLUP shall adhere to the following guidance/policies and to best available scientific advice that are of specific relevance to BIO:</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>

<p>IFI advocates consideration of the following areas in terms of potential environmental impacts with relevance to Ireland’s inland fisheries resource:</p> <ul style="list-style-type: none"> <li>Water quality</li> <li>Surface water hydrology</li> <li>Delivery of additional ecosystem service through nature based planting</li> <li>Fish spawning and nursery areas</li> <li>Passage of migratory fish</li> <li>Areas of natural heritage importance including geological heritage sites</li> <li>Biological diversity</li> <li>Ecosystem structure and functioning</li> <li>Sport and commercial fishing and angling</li> <li>Amenity and recreational areas</li> <li>Sediment transport</li> </ul>	<p>Inland Fisheries Ireland</p>	<p>Noted. Environmental topics were scoped as deemed necessary as part of the SEA.</p>
<p>We therefore provide some further clarification with regard to the transboundary baseline information outlined in para 5.7.1.1. 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 : <a href="https://www.communities-ni.gov.uk/publications/register-parks-gardens-and-demesnes-special-historic-interest">https://www.communities-ni.gov.uk/publications/register-parks-gardens-and-demesnes-special-historic-interest</a></p>	<p>NI Department for Communities - Historic Environment Division</p>	<p>Noted. Transboundary baseline information has been considered in the SEA and AA as deemed relevant</p>
<p>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 onshore wind energy developments, and how those assets are seen, appreciated, understood and enjoyed.</p>	<p>NI Department for Communities - Historic Environment Division</p>	<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 new forest creation or any the implementation of any of the plan objectives.</p>
<p>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&amp;CH</p>	<p>NI Department for Communities - Historic</p>	<p>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</p>

SEA Objectives, should a heritage led approach be adopted in taking forward masterplans for future visitor destinations.	Environment Division	order to take into account the potential for unknown archaeological features on future sites.
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.
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. 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”.
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.
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.
‘Nitrogen deposition at ecological areas that are sensitive to nitrogen is not increased’. 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
“Developing an appropriate set of monitoring standards” for Air Quality (page 140 within SEA Environmental Report). Further information on	Department of Agriculture,	The section in the SEA Environmental report states that ‘Monitoring of the draft FESLUP, its objectives and performance against any ambitions set

what these monitoring standards will be for monitoring air quality impacts would be useful.	Environment and Rural Affairs Northern Ireland (DAERA)	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'.
Relationship with Other Relevant Plans, Programmes and Legislation 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.	Department of Agriculture, Environment and Rural Affairs Northern Ireland (DAERA)	Appendix A2 has been updated to include reference to Northern Ireland marine policy, legislation plans and programmes.
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.
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
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.
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.
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	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.

<p>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.</p>		
<p>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.</p>	EPA	<p>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"</p>
<p>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.</p>	EPA	<p>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.</p>
<p>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.</p>	EPA	<p>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.</p>
<p>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 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</p>	EPA	<p>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.</p>
<p>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 (<a href="https://www.epa.ie/publications/monitoring--">https://www.epa.ie/publications/monitoring--</a></p>	EPA	<p>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 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</p>



assessment/climate-change/air-emissions/irelands-national-inventory-submissions-2023.php)		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’. This is considered sufficient to highlight the importance of siting forestry in appropriate areas.
It would be useful to clarify whether consultation with the environmental authorities 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 (UNECE Protocol on Strategic Environmental Assessment to the Convention on Environmental Impact Assessment in a Transboundary Context) 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.
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. 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	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.
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.
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.	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.

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.		The plans relating to biodiversity, renewable energy and tourism / recreation shall be highlighted within the list of relevant national and regional plans.
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.
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.
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 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.	EPA	Noted – Please see Section 5, Current State of the Environment for further details.
In addition to the CORINE data used to identify land use, land use change and forestry, the Tailte 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 Tailte Eireann landcover map be used on a local scale, while the CORINE map be used for national scale plans.
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
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.
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.

<p>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</p>	EPA	<p>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.</p>
<p>EPA Guidance on SEA-related monitoring is available at <a href="https://www.epa.ie/publications/monitoring--assessment/assessment/strategicenvironmental-assessment/06695-EPA-SEA-Statements-and-Monitoring-Report.pdf">https://www.epa.ie/publications/monitoring--assessment/assessment/strategicenvironmental-assessment/06695-EPA-SEA-Statements-and-Monitoring-Report.pdf</a>. 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 deal with the possibility of cumulative effects. Monitoring of both positive and negative effects should be considered.</p>	EPA	<p>This comment is welcomed and was considered during the writing of the SEA ER.</p>
<p>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.</p>	EPA	<p>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.</p>
<p>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</p>	EPA	<p>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.</p>
<p>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.</p>	EPA	<p>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.</p>
<p>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.</p>	EPA	<p>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.</p>
<p>Once the FESLUP is adopted, an SEA Statement should be prepared that summarises: How environmental considerations have been integrated into the FESLUP;</p>	EPA	<p>This comment was noted and referred to when writing the SEA Statement.</p>

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.

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:

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

In accordance with the SEA Regulations the following authorities should be consulted with:

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.