



A review of the form and function of the  
Native Woodland Scheme Conservation measures  
Discussion document - December 2021

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Figure 1 Lichens colonizing an Oak gate beside Manch wood, Dunmanway, Co. Cork

## Introduction:

*'What are you doing here?' Cúchulainn said.*

*'Getting chariot-shafts,' the charioteer said. 'We smashed our chariots chasing that wild deer Cúchulainn. Help me with them,' he said. 'Would you rather cut out the shafts or do the trimming?'*

*'I'll do the trimming,' Cúchulainn said.*

*Then under the other's eyes, he stripped the holly shafts through his clenched fist, paring them clean, knot and bark'.*

*(Táin Bó Cuailinge c.8<sup>th</sup> century translated by T. Kinsella 1969)\**

*Quote 1: Quote indicating that species specific greenwood working skills were commonplace in prehistory*

This discussion document was prepared for circulation in advance of the formation of an expert committee of the Technical Advisory Panel (TAP) of Woodlands of Ireland (Wol) from a wide range of stakeholders, to focus on issues about the Conservation measures of the Native Woodland Scheme (NWS), with a view to making observations /recommendations to Government Depts and others concerned with the wellbeing of our native semi-natural

woodland and associated habitats. The purpose of the document is to outline the issues to be discussed regarding the form and function of the Native Woodland Scheme Conservation measures and to invite further suggestions and observations on the subject, particularly aspects that have been omitted or overlooked. <sup>1</sup>

NWS Conservation measures are intended to support the protection and enhancement of existing native woodlands (especially the restorative management of ancient woodlands, Annex I woodlands, old woodlands and emerging native woodlands under threat from 'scrubbing out') and, where appropriate, the conversion of conifer forest to native woodlands. <sup>2</sup>

The Forestry Programme 2000-2006 set out a target (in 2001) of 15,000ha of NWS Conservation funding. By the time the Conservation scheme was cut in 2008 c.2,500ha ( 17% of the target) had been funded under the scheme.

The NWS Conservation measures eventually reopened in 2015.

The Forestry Programme 2014-2020 set out a target of 1,950 hectare (ha) of NWS Conservation funding. **By October 2021 only 253ha (14%) of the target area had been funded under the scheme.**

In comparison, NWS Establishment achieved 70% of a 2,700ha target in the same period (for more detail see appendix 1 below).

**It is important to note that every application for NWS Conservation processed since 2015 has been approved for grant aid (FS pers.com)**

Economist Colm McCarthy's opinion article regarding action on the Climate crisis, in the Irish Farmers Journal on 23/10/2021 is headlined:

*'Government targets are not policies':*

*'Irish governments have long preferred targets to policies: targets can be lofty and inspiring and failure to deliver blamed on uncontrollable circumstances. Quickly forgotten, they can be replaced with fresh targets. Policies must be announced, defended and implemented in the here and now.'*

*Quote 2: Colm McCarthy opinion piece quote.*

Discussions between stakeholders should begin to answer some key questions such as:

- What were the impediments to the uptake of the scheme?
- How was the scheme being applied where funding was approved?

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<sup>1</sup> The assistance of both Forest Service and NPWS staff in compiling data for this document is much appreciated

<sup>2</sup> For full details of the current scheme see: <https://www.gov.ie/en/service/803ef3-native-woodland-conservation-scheme/#what-the-native-woodland-conservation-scheme-is>  
<https://www.teagasc.ie/crops/forestry/grants/management-grants/native-woodland-conservation/>

- Is it time for a comprehensive policy framework and a new semi-natural woodland strategy?  
In preparation it can be useful to look at the background to the scheme and previous strategies and targets.

## Deforestation:

A note of concern arising from the EPA Report 221 '21st Century Deforestation in Ireland' is with reference to broadleaf forest removal (parts of which are often categorised as scrub) *'The rate of deforestation of broadleaf forests was considerably higher than for mixed and conifer-dominated forests. Broadleaf-dominated forests constitute only 25% of the national forest area. Indeed, semi-natural broadleaf forests are rare in the Irish landscape, accounting for just 2% of the national forest area (Perrin et al., 2008)'. 'From a conservation perspective, the high rate of deforestation of broadleaf forests is of concern, particularly in the context of habitat protection legislation such as the EU Habitats Directive (92/43/EEC). Additional analysis indicated that, between 2000 and 2012, 52 deforestation events took place in ancient or long-established woodland, a particular rarity among Ireland's forest types (Perrin and Daly, 2010)'*.

## Reviewing aspects of 'A Strategy for Native Woodlands in Ireland 2016-2020'

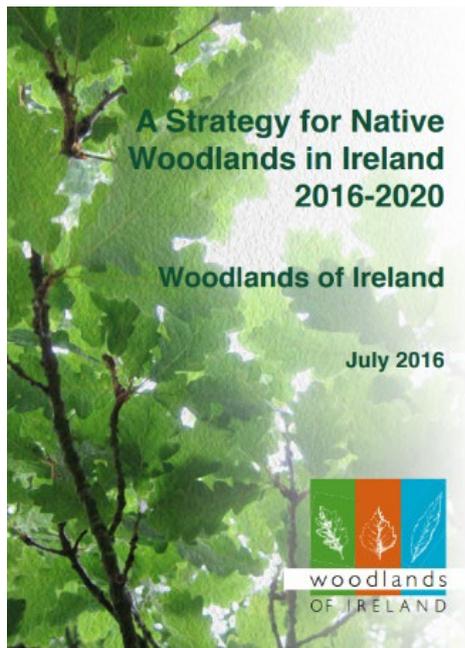
Woodlands of Ireland, a partnership-based environmental charity dedicated to native woodlands, had developed a 5-year native woodland strategy with input from key government bodies and native woodland stakeholders.<sup>3</sup>

The Woodlands of Ireland (Woi) project, comprising interested native woodland stakeholders, is an initiative established in 1998 to address the sustainable management and expansion of native woodland. See [www.woodlandsofireland.com](http://www.woodlandsofireland.com)

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<http://www.woodlandsofireland.com/sites/default/files/Woi%20NW%20Strategy%20Final%2824July16%20LoRes%20for%20webpage%29.pdf>



### Key aspects of the strategy relevant to NWS Conservation measures reiterated:

The primary funding mechanism for the restoration and expansion of native semi-natural woodland in Ireland available to both the public and private sectors, is the DAFM Forest Service (FS) Native Woodland Scheme package under the current Forestry Programme 2014-2020, which has provision of almost €24 million for the conservation of just under 2,000 hectares of existing native woodland (including conversion from conifer forest to native woodland) and the creation of 2,700 hectares of new native woodlands. Due to the delay in the starting of a new round of the EU Common Agriculture Policy, the current Forestry Programme is extended to December 31<sup>st</sup> 2022. Other funding mechanisms include other

exchequer funding, EU LIFE and via activity by a range of Environmental Non-Government Organisations (ENGOS)

Only c.2% of the land area of the state is covered by what is termed 'native' or 'semi-natural' woodland (i.e. woodland dominated by native tree species), and much of this is highly fragmented and modified. (Perrin et al., 2008). (c.1.8% in PAF March 2021 see below)

Native woodlands are a vital facet of Ireland's natural, historical and cultural heritage, and are unique in terms of their inherent woodland biodiversity and the complex ecosystem services they provide. They support the realisation of wider ecosystem functions including genetic conservation, the protection and enhancement of water quality, aquatic habitats and in-stream species, the creation of linkage between semi-natural habitats at a landscape level, and climate change mitigation. With appropriate management, they also generate quality wood and non-wood products, provide a unique setting for outdoor recreation and environmental learning, and contribute to rural livelihoods and local economies.

It was expected that the strategy would be supported by most native woodland stakeholders, including key government agencies and departments with stated responsibilities and commitments in the area.

### Targets in the Forestry Programme 2014-2020

The NWS Conservation allocation was divided between the private and public sectors over this period, as follows:

- Private sector: 520 hectares of 'high forest' native woodland (including conversion from conifer forest to native woodland) and 360 hectares of native emergent woodlands ('scrub').
- Public sector: 1,070 hectares of 'high forest' native woodland (including conversion from conifer forest to native woodland). NPWS c.500ha Coillte c.500ha



- Woodlands designated as SACs and NHAs – private 400ha and Coillte 300ha prioritising Annex1
- Freshwater Pearl Mussel (FPM) and salmonid catchments – Coillte 200ha and private 120ha
- Emergent Woodland -360ha located on mineral soils and within 2 km of existing designated woodlands.
- Integration of the NWS package and the NeighbourWood Scheme – 15 projects
- 1,950 hectares for NWS Conservation total

## Targets in the Prioritised Action Frameworks (PAFs) (NPWS 2021) for the period 2021-2025

- Old oak woodland (91A0): 1,500ha
- Alluvial woodland (\*91E0): 500ha

These targets rely heavily on NWS Conservation funding as well as EU LIFE project funding.

In support of assisting NPWS and others in achieving these targets Woodlands of Ireland made a submission to the NPWS Review April 2021 (copy available on request) advising that the NPWS should develop its' own woodland management training facilities regionally and build a cohort of woodland managers and staff attached to specific woodland sites. This is to support the existing scientific expertise in NPWS to achieve conservation goals. The work of the NPWS is focused on implementing the Wildlife Act **1976** and subsequent Amendments (See <https://www.npws.ie/legislation>) as well as the UN CBD and EU Directives (see below)

The basic designation for wildlife under the Wildlife Act is the Natural Heritage Area (NHA). Many sites are proposed NHAs (pNHA) as they have not yet been legally designated. NHAs and pNHAs are areas considered important for the habitats and species they contain, and which require protection.

There is c.5,000ha native woodlands protected in designated National Parks and Nature Reserves. There are approximately 23,764 hectares of woodlands proposed as NHAs, while National Parks and Nature Reserves account for 2,854 hectares and 2,628 hectares, respectively (Fahy & Cross, 2005). (Note that these areas overlap, and the figures are not cumulative.) Much of this could avail of NWS Conservation funding.



Figure 2 Forest Service Inspectors Eugene Curran and Kevin Collins approve first NWS Conservation contract involving Hazel coppice restoration at Laughtavarry, Co. Mayo. Spring 2001. Photo by B. Joyce

### Key points in the native semi-natural woodland story since 1988:

In **1988** there were 2 main grant schemes that could be applied to existing woodland:

- (a) Woodland Improvement – most semi-natural woodland did not qualify as the view was that there was nothing in them to improve (pers. obs.)
- (b) Scrub clearance/ afforestation – most of the grant aided activity with semi-natural woodland/scrub occurred with this scheme. In general, all non-commercial species were to be cut back, stump treated or cleared and then replaced preferably with Beech, Sycamore, Sitka spruce or Oak of non- native provenances, (pers. obs.)

**1988** was also the year that the Forest and Wildlife Service was divided into 3 parts:

- National Parks and Wildlife Service with c.6,000ha of woodland/forest plantation
- Coillte Teoranta with c.27,000ha of 'Old Woodland ' sites potentially for restoration
- Forest Service of DAFM, the regulator and administrator of a range of grants/licensing

### Convention on Biological Diversity

The UN Convention on Biological Diversity (CBD) **1992** was ratified by Ireland in 1996. As a contracting party to the CBD, Ireland is committed to measures to conserve biodiversity, including native woodlands, under the following themes:

- Conservation of ecosystems, habitats and species in their natural surroundings, both inside and outside protected areas (in situ conservation)
- Conservation of the components of biological diversity outside their natural habitats (ex situ conservation)
- Impact assessment
- Identification and monitoring
- Sustainable use of ecosystems, species and other biological resources
- Adoption of incentive measures
- Research and training
- Public awareness and education
- Policies and mechanisms for equitable sharing of benefits of genetic resources
- Facilitating access and transfer of technology
- Exchange of information
- Technical and scientific cooperation
- Access to and safe use of biotechnology
- Provision of financial resources to achieve the CBDs objectives, both nationally and internationally.

## EU legislation

The Habitats Directive (1992) and the Birds Directive (1979/2009) together form the cornerstone of Europe's nature conservation policy. This policy is built around two pillars: the Natura 2000 network of protected sites (i.e. Special Areas of Conservation (SACs) and Special Protection Areas (SPAs), which are applicable to birds), and a strict system of species protection. The Habitats Directive protects over 1,000 animal and plant species and over 200 'habitat types' (e.g. special types of forests, meadows, wetlands, as listed in Annex I of the Directive) which are of European importance. **These Annex I habitat types include five woodland habitats relevant to Ireland: Old Oak Woodland; Bog Woodland; Residual Alluvial Forest; Yew Woodland; and Hazel/ash scrub/woodland** (i.e. woody facies of limestone pavement). In relation to native woodlands, the basic legal designation for wildlife under the Habitats Directive, transposed into Irish law, is the SAC. These are the prime wildlife conservation areas within the country and are considered to be important at a European level. Those protected species and habitats giving rise to the designation of an SAC are referred to as 'qualifying interests'. **In Ireland, approximately 6,500 hectares of native woodland are designated as SACs** under the EU Habitats Directive, including the five Annex I native woodland habitat types listed above. Individual species relevant to native woodland, such as the Killarney fern, can also be listed as a qualifying interest.

In addition, under Article 17 of the Habitats Directive, each Member State is obliged to report to the European Commission on the status of listed habitats and species every 6 years. In particular, maintaining and / or restoring habitats and species to a favourable conservation status is a priority. The PRIORITISED ACTION FRAMEWORK (PAF) FOR NATURA

2000<sup>4</sup> in Ireland (NPWS 2021) indicates bad status for Annex 1 woodland habitats as illustrated in table 1 below.

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

**Table 1** Summary table showing the assessment summary and overall status for EU Habitats Directive Annex I habitat types relevant to native woodland in Ireland, for the year 2019 (NPWS 2021), with the overall status for the year 2013 and 2007 included for comparison. (Priority habitat listed under Annex I indicated by asterisk (\*).)

The current EU Priority Action Framework addresses the co-financing of Natura 2000 sites, including Priority Woodlands, contains 13 references to funding via the NWS Conservation measures.

#### ENGO and Third Level Education initiated forums:

Following a number of ENGO and Third Level Education initiated forums for stakeholders, on the outlook for semi-natural/native woodland, in **1996** and **1997**, the demand for action was increasing. **1998** saw the beginnings of the Woodlands of Ireland Project, initially facilitated by the Heritage Council and then by the Tree Council of Ireland.

#### People's Millennium Forests (PMF) Project:

The advent of the new Millennium was seen as an opportunity to highlight the poor state of Ireland's native woodlands and to act accordingly through a dedicated project. This was initiated by the then-newly established Woodlands of Ireland (Wol) organisation, which developed a millennium project proposal for corporate and public sponsorship. This subsequently evolved into the PMF Project, a €6.35 million initiative sponsored by the National Millennium Committee, AIB Bank and the Forest Service. The project was managed by Coillte in partnership with Wol and set out to restore 16 semi-natural woodlands island wide, totalling over 600 hectares and including six Special Areas of Conservation (SACs).

#### Launch of the Native Woodland Scheme

Building on a proposal initially developed by Wol, the Forest Service **Native Woodland Scheme** (NWS) was launched in November **2001**, offering financial support for the conservation and appropriate restoration management of existing native woodlands, and the establishment of new native woodlands on open greenfield sites. (See figure 2 above)

Under the NWS, the Forest Service vision in 2001 was to create 15,000 hectares of new native woodland and to restore 15,000 hectares of existing native woodland within the National Development Plan 2000-2006. These were highly ambitious targets, given that the capacity of the newly emerging native woodland sector was limited. Up to the time of publication of the Strategy (2016), the NWS had supported the creation and restoration of

<sup>4</sup> <https://ec.europa.eu/environment/nature/natura2000/financing/docs/PAF%20format%20EN.docx>

over 4,000 hectares of native woodland. Around **2,500ha** of this was **NWS Conservation in the 2001-2008 period** (Bullock and Hawe 2014)

This progress was based on the ongoing integration of expertise and knowledge regarding woodland ecology and forest planning / management, which is needed to achieve the necessary synergies and to identify best practice in relation to native woodland management. It was also made possible by increasing the supply of native provenance planting material for native trees and shrubs, from acceptable sources within the island of Ireland.

A range of Forestry schemes, including the NWS, were cut back in late **2003** and then re-instated in **2004** causing disruption and uncertainty.<sup>5</sup> A First Native Woodland Conference was held in Galway in **2004**.<sup>6</sup>

The National Survey of Native Woodlands **2008** (Perrin et al 2008)<sup>7</sup> provides 'baseline' information regarding the current state of the resource and threats facing it, and how best to conserve, restore and strategically expand it.

**NWS Conservation was an early casualty of the economic crash of 2008 and was closed.**

This had a major impact on contractors beginning to specialise in the scheme (pers. obs.). It returned with some difficulty and made it back into the Forestry Programme in 2015.

A provisional inventory of ancient and long-established woodland in Ireland (Perrin and Daly) was published in **2010**, with concluding remarks: '*Previous ancient woodland research has found that ancient woodlands have quite disturbed histories in terms of exploitation (Bohan 1997; Little 1994), and their survival thus far only enhances the need to conserve them within the modern landscape.*'

Management Guidelines for Ireland's Native Woodlands (Cross and Collins **2017**) included the updated woodland classification based on the National Survey of Native Woodlands.<sup>8</sup>

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<sup>5</sup> <https://www.independent.ie/business/farming/joe-walsh-gives-back-support-schemes-that-were-taken-away-26017989.html>

<sup>6</sup> <http://www.woodlandsofireland.com/publications/ireland%E2%80%99s-native-woodland-conference-proceedings>

<sup>7</sup> <http://www.botanicalenvironmental.com/wp-content/uploads/2011/03/Volume-1.pdf>

<sup>8</sup>

<https://www.npws.ie/sites/default/files/publications/pdf/Management%20Guidelines%20for%20Ireland%27s%20Native%20Woodlands%202017.pdf>

The Second Native Woodland Conference in **2018** presented recent initiatives, policy developments and research projects.<sup>9</sup>



*Figure 3 Stream bank in grazed woodland in west Co.Clare 2021.*

## Native woodlands and water

In recent years, the potential role of new and existing native woodland, including woodland within riparian areas, in the protection and enhancement of water quality, the conservation of instream species of protected status (e.g. Freshwater Pearl Mussel (FPM), salmonids and otter), and the control of flood water and bankside erosion, has come into sharp focus. This role is envisaged both at a site level (e.g. the conversion of existing conifer forest into native woodland to protect a nearby population of FPM) and at a wider strategic level (e.g. the positioning of new native woodland at key points along a watercourse, as part of a wider programme of activities to improve the overall waterbody status under the EU Water Framework Directive).

Regarding the planning and ongoing management of riparian native woodlands and the management of Forest Service-stipulated Aquatic Buffer Zones (ABZs, also referred to as 'water setbacks') protective woodland buffer creation, needs to be used to support the implementation of relevant legislation and strategies, such as the Water Framework Directive, the Floods Directive, the Catchment Flood Risk Assessment and Management (CFRAM) programme, and the National Landscape Strategy for Ireland 2015-2025.

<sup>9</sup> <http://www.woodlandsofireland.com/native-woodland-conference-2018>

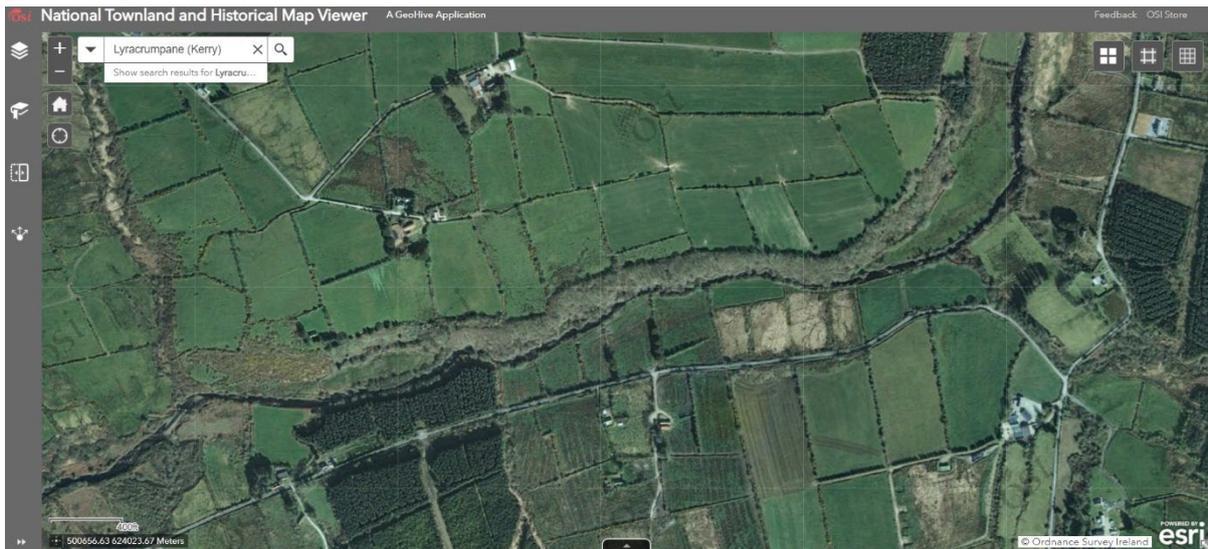


Figure 4 Annex 1 Old Oak wood north of the Smearlagh river, part of Lower River Shannon SAC

## EU Floods Directive (2007/60/EC)

This directive aims to reduce impacts by taking a sustainable, catchment-based approach to the assessment and management of flood risk. The national Catchment Flood Risk Assessment and Management (CFRAM) programme was developed to meet the requirements of the Floods Directive, and native woodlands can play an important, protective role in this process.

## Scenario 6

The Forest Service are working on a new scenario to add to the existing 5 scenarios of the NWS, which is designed to encourage both the conservation maintenance of existing riparian woodland but also the creation of new protective buffer zones along water courses including some areas liable to flood. This should help reduce the impact of Nitrogen and Phosphorus from agriculture in the areas of Pollutant Impact Potential (PIP) illustrated on the latest EPA maps.<sup>10</sup>

Woodlands of Ireland produced a discussion document and have set up a TAP expert committee on 'developing criteria for mapping potential Protective Forest Zones in catchments' (March 2021) Copies are available on request.

## Native Species Reforestation

Restocking, with native species of indigenous genetic sources, of areas previously stocked with non-native conifer species, particularly in sensitive locations near water courses, is currently encouraged as part of the creative use of NWS Conservation measures by the Forest Service. Should it be called and administered as what it is?: **A Reforestation grant scheme** where native species restock is prioritised to create in many cases Continuous Cover

<sup>10</sup> <https://www.catchments.ie/next-generation-pollution-impact-potential-maps-launched/>

Forestry (CCF) with the primary function of being permanent protective forest, buffering aquatic zones and Natura 2000 sites and species generally.



Figure 5 *Rhododendron ponticum*



Figure 6 *Prunus laurocerasus*

### Invasive species:

A key reason for making use of the NWS Conservation measures is to control and or eliminate a range of invasive species, particularly *Rhododendron ponticum* and *Prunus Laurocerasus* (Cherry Laurel) as illustrated in figures 5 and 6 above. The analysis of data from the 40 contracts approved under the NWS Conservation measures since 2015 to date (see more detail below) indicate that 50% of sites submitted had some invasive species present but the type and extent of infestation has not been collated from the files as yet.

The outlook for the continued use of Glyphosate as a herbicide to control invasive species in the coming years is uncertain due to concerns about the toxicity of the chemical formulas used and the health and welfare of those employed to apply it (PAN 2020)(Robinson et al 2020).

Could Ammonia Sulphamate, which was used for invasive species control in the past, be a potential less toxic alternative? It is considered to be less harmful to the environment and less toxic to users. <sup>11 12</sup>

### Tree pests and diseases:

There are an increasing number of pests and diseases affecting native species of trees:

#### Ash Dieback

In figure 7 below, the plantation of Ash planted in 2005 is shown in Summer 2021 with severe dieback, although occasional stems show little or no sign of infection.

The reduced frequency of Ash in semi-natural woodland and hedges as a result of Ash dieback disease poses a major challenge to both foresters and ecologists. As older trees do

<sup>11</sup> <https://sitem.herts.ac.uk/aeru/ppdb/en/Reports/35.htm>

<sup>12</sup> <https://echa.europa.eu/substance-information/-/substanceinfo/100.033.960>



*Figure 7 Severe Ash dieback in a plantation established in 2005 at Gortvagh, Co. Leitrim.*

### What measures could be taken?

- Suggest using the five-point scale described by Teagasc in the video in the link above, to assess disease levels in individual trees.
- Cull significantly diseased trees in woodlands and restock with more diverse native species such as Oak, Scots pine, Wild Cherry, Birch, Hazel and a selection of minor species as described in the Native Woodland Scheme measures.
- Create conditions for natural regeneration by opening glades/removing invasive species.
- Monitor natural regeneration for disease resistance.
- Eventually collect and propagate seed from healthy trees.
- Carry out a risk assessment before felling very diseased or dead Ash as they may tend to shard into sharply pointed projectiles that could cause injury or death (D.Brickenden pers.com.2021)

<sup>13</sup> <https://www.teagasc.ie/news--events/daily/forestry/new-findings-in-ash-dieback-research-by-teagasc.php>

This is a situation where converting Ash plantations to native mix species stands using the NWS Conservation measures could be considered as an option by DAFM. It would allow land owners who choose that option to avail of a 7 year annual premium at €350/ha.

Other tree diseases of current concern are included on the DAERA website at: <https://www.daera-ni.gov.uk/articles/plant-and-tree-diseases-current-concern>



Figure 8 Expanding tree cover on the lower slopes of the Bluestack mountains in Co. Donegal 2019

### Emergent woodland measure:

As we approach the conclusion of the formulation of the next round of CAP, it is important that the incentives to retain and conserve emerging woodland/scrub are sufficient to match 'Area Aid' or are compatible with any new variations in payment structure, for example relating to Greenhouse Gases (GHGs) or permanent mitigation measures and Climate Change, in Agri-Environment measures.

Regarding Greenhouse gas calculations and the issue of rough grazing to scrub conversion and vice versa, the EPA Report 198 (2017) states: *There are no current guidelines for the estimation of biomass carbon stock changes following transitions to and from rough grazing/scrubland. The default methods all assume a zero net change. However, a review of the literature suggests that rough grazing/scrubland can contain a significant amount of aboveground biomass, ranging from 21 to 32t biomass/ha (Woodcock and Stephens, 2012). This would equate to a peak biomass value of approximately 13.5t carbon/ha over a 25-year period, which could represent a significant emission or carbon gain following transition, and is not currently estimated in the Irish national GHG inventory (EPA, 2013).p.46 and comments later: '... any external land use policy that may incentivise the clearing of scrubland for agricultural production may result in an emission from*

*these lands.'*<sup>14</sup> The EPA Report 198 concludes: 'However, significant improvements to satellite-derived classifications, or the post classification of these products, are required to better characterise grassland– scrub–forest transitions. The inclusion of the scrubland category in the land cover classification makes a significant impact on the GHG emission/reduction profile for the LULUCF sector.'

Native woodland scrub (or emergent woodland) requires a clear focus, especially to offset the destruction of potentially valuable native woodland biodiversity and wood production potential. This new 'Emergent Woodland' component to NWS Conservation was added in 2015. Uptake has been poor, c.16ha to date from a target of 360ha in the current Forestry Programme. The author submitted an Emergent Woodland Review for Woodlands of Ireland in June 2020 to both the Forest Service and Agri-environment sections of DAFM. (Copies are available on request). A key recommendation to DAFM was that the decision by a landowner to go with the process of transition from agricultural land use to native woodland conservation /forestry is in effect conclusively taking land out of the agricultural (area aid) option and converting to (permanent climate mitigation) Continuous Cover Forest, therefore the higher premium rate and the longer duration applied to afforestation should be considered here, in order to strengthen the incentive and increase uptake. DAFM were also asked by Woodlands of Ireland to consider building in flexibility to the next CAP/Forestry Programme measures, allowing landowners availing of either Agri-environment or Forestry measures to incorporate Emergent woodland parcels easily into either set of incentives for nature conservation.

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<sup>14</sup> <https://www.epa.ie/publications/research/land-use-soils-and-transport/research-198-the-irish-land-mapping-observatory-mapping-and-monitoring-land-cover-use-and-change.php>



*Figure 9 Browsed Oak outside a Deer fence at Mullangore wood, Glenveagh National Park*

### Grazing:

The grazing of Deer in particular (as illustrated in figure 9 above) is one of the biggest issues facing woodland management. Overgrazing eliminates natural ground flora and the regeneration of native trees and shrubs and threatens many of our finest woods. Conversely, the absence of grazing results in a few competitive but browse sensitive plant species outcompeting others, and reduces biodiversity. Temporary grazing could be used as a tool to create conditions where natural regeneration is more likely to occur. For more information on how grazing might be used in some circumstances as a conservation management tool see below.<sup>15</sup>

The Management of Deer in Native Woodlands is described in Native Woodland Information Note No. 7 (Höna et al 2018).<sup>16</sup>

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<sup>15</sup> <https://forestry.gov.scot/woodland-grazing-toolbox>

<sup>16</sup> <http://www.woodlandsofireland.com/sites/default/files/No.%207%20-%20Deer%20NWS%20InfoNote.pdf>



Figure 10 Information board about the ongoing monitoring at Brackloon Wood, Co. Mayo.

### NWS Conservation measure training and research:

2-day NWS training events, provided by Woodlands of Ireland in conjunction with the Forest Service, have run periodically over the last 20 years. However specific training modules particularly at operative and technician level, have not been incorporated into curriculums of relevant third level institutions such as Waterford Institute of Technology and Ballyhaise Agriculture College, where forestry courses are taught. The UCD Forestry course has included a lecture and field trip introduction annually to the subject of native semi-natural woodland in recent years.

Silvicultural systems that could be applied in semi-natural woodland are generally within the Continuous Cover Forestry definition and so co-operation by Woodlands of Ireland with both Pro Silva and Teagasc in the development of additional training opportunities is ongoing. A description of the Teagasc CCF training activity linked to Coillte’s Bio forest project can be viewed at the European Forest Institute site <sup>17</sup>.

Learning the techniques of long-term monitoring, surveying and corresponding active management of Ancient and Long Established Woodland could form part of a more comprehensive forestry education given the ongoing Climate and Biodiversity crises.

<sup>17</sup> [Combining silviculture and ecology to benefit our forests - the Irish way - Resilience Blog \(resilience-blog.com\)](https://resilience-blog.com)

This could take the form of a post graduate diploma.

### Sustainable supply of planting stock:

There is an upward trend in the amount of NWS Establishment planting in recent years despite the overall decrease in Afforestation (See appendix 1 below). Species such as Oak and Hazel (see figure 11 below) which produce batches of seed more sporadically and are more difficult to hold in store than other species, can be frequently in short supply. In the case of Oak, by mid planting season derogations are often sought to supplement supply to approved contracts with plants of Northern European provenances, usually Dutch. In addition Agri-environment schemes will continue to draw from the available supply of indigenous genetic stock, particularly of 'minor' species such as Spindle, Guelder rose and Crab apple.

The absence of Ash from the planting menu leads to some increased demand for replacement species such as Oak, Wild cherry, Scots pine, Birch and Hazel.

Please note that a separate TAP expert committee is focused on seed and plant supply issues. For more information on this please contact us at [info@woodlandsofireland.com](mailto:info@woodlandsofireland.com)

### The European context:

To what extent can the new EU Forest Strategy and the EU Biodiversity Strategy assist in our achieving substantially more native woodland conservation<sup>1819</sup>?

The result of how the competent authorities in Ireland interpret these strategies will be seen in the details of the new incentive schemes from January 2023.

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<sup>18</sup> <https://www.eea.europa.eu/policy-documents/the-eu-forest-strategy-com>

<sup>19</sup> <https://www.eea.europa.eu/policy-documents/eu-biodiversity-strategy-for-2030-1>



Figure 11 Plant passport for Hazel from Co. Clare.

## Analysis of how the uptake of the scheme was used from 2015-2021 (data source Forest Service)

Questions based largely on the targets set out in 'A Strategy for Native Woodlands in Ireland 2016-2020' were asked by Woodlands of Ireland to the Forest Service. These were presented in a tick box format (see appendix 2) and Forest Service were requested to provide responses on an accompanying spreadsheet.

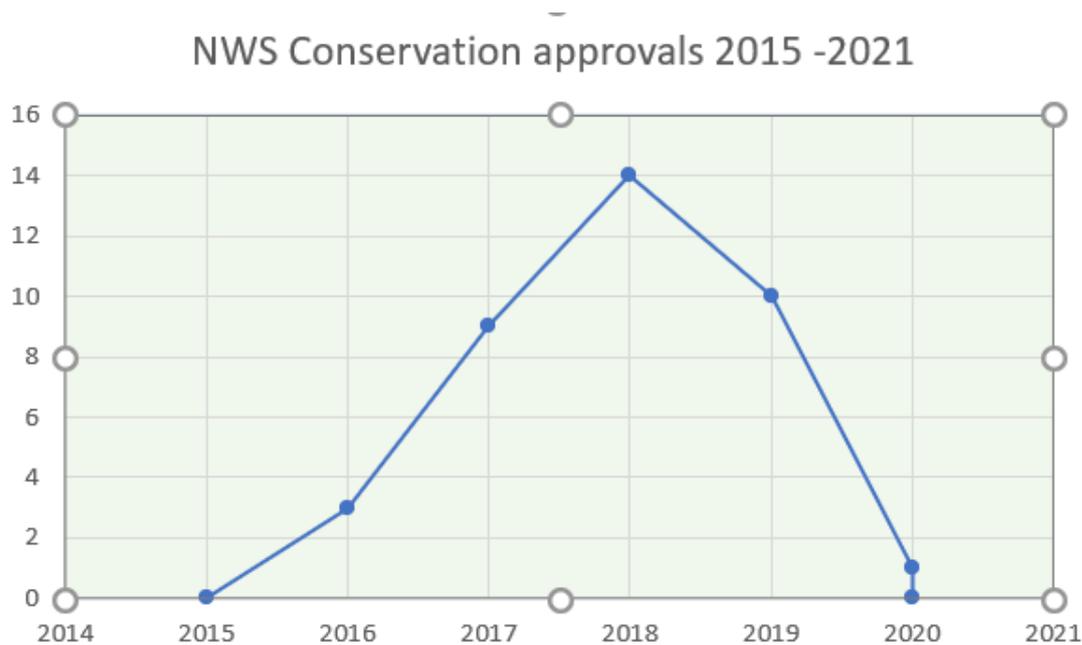
The data then provided was based on what had been scanned on to the DAFM IFORIS grant payment system rather than from looking at the actual paper-based files for each contract<sup>20</sup>.

### The key findings are described below:

There were 40 individual contracts approved for funding -the date for three contracts is unknown.

Year	Number of Approvals
2016	3
2017	9
2018	14
2019	10
2020	1
2021	0
Unknown	3
<b>Total</b>	<b>40</b>

<sup>20</sup> Please note NWS Conservation Applications are still printed out and use manually submitted forms.



Graph 1 shows the no. of contracts approved since the NWS Conservation schemes' return in 2015

The decline in NWS Conservation approvals may be directly linked to the Forest Service reaction to the European Court of Justice ruling of April 2018<sup>21</sup>. Since then, an instruction was given to Forest Service staff to curtail the processing of NWS Conservation applications. Although there are c.63 applications (FS pers.com) pending approval, only one contract was approved in 2020 and 0 to October 2021. (As of mid-October Forest, Service now have one staff member back processing files)

Please note: there are a number of cases where an Inspector has put applications forward for approval but further processing appear to remain incomplete during 2021. (FS pers com)

It should also be noted that there was a vacancy in the role of Woodland Ecologist with NPWS in the period c. June 2013 to September 2018 and this would have impacted strongly on the initiation of NWS Conservation applications by NPWS up to mid- 2019. Processing of applications was then unofficially suspended by DAFM during 2020.

The total area approved and funded in the 2015-2021 period was 253.21ha of which 209.36 ha was private sector (35 contracts)

43.85ha was public sector-Coillte 42.08ha (4 contracts) and ESB 1.77ha (1 contract)

The NWS Conservation pilot project at Glengarriff Woods Nature Reserve which was approved in November 2020 (NPWS pers. com) did not appear on the list provided by FS.

The average time between receipt of an application and approval was 9.8 months, with the shortest time being c.2 months and 5 days and the longest being c.2 years and 6 days.

<sup>21</sup> <https://curia.europa.eu/juris/document/document.jsf?docid=200970&doclang=EN>

The average processing time for the 4 Coillte contracts was c.7.65 months

The average size of site was 6.33ha, the smallest being 1.21ha (Kerry LIFE) and the largest being 23.11ha (Coillte Kerry LIFE)

Two sites were in excess of the 12 hectare per annum limit usually imposed on applications.

The last NWS Cons. Contract to be approved was 11<sup>th</sup> May 2020 according to the data provided by the Forest Service.

It is estimated that the c.63 applications in the NWS Conservation 'backlog' represent c.400ha based on the average size site approved in the 2015-2020 period.

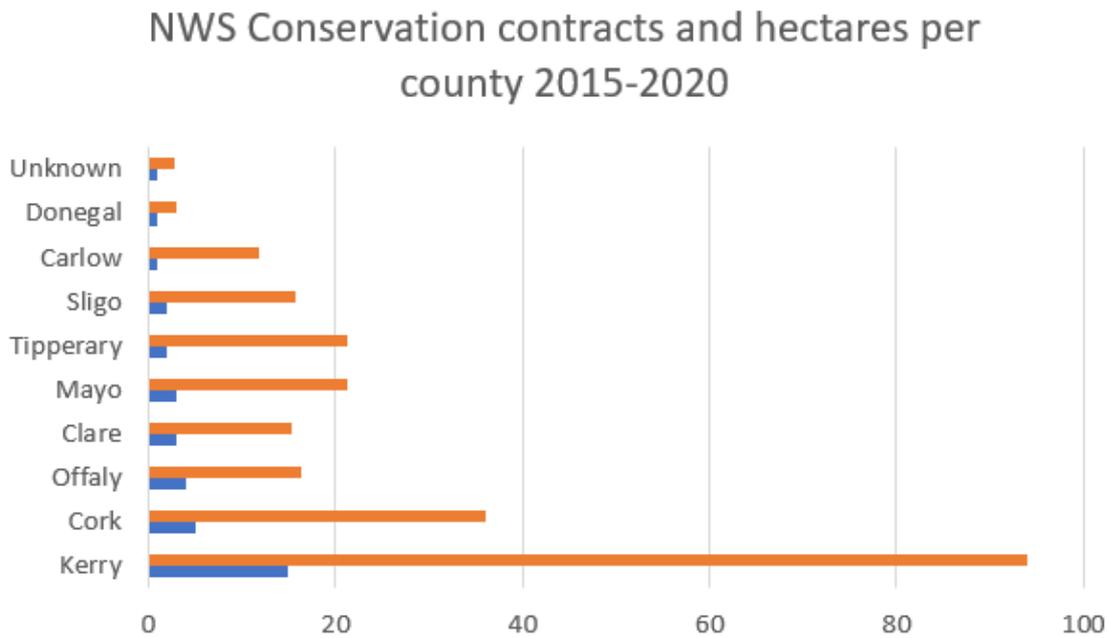
**The distribution of contracts per county in order of number and size (graph 2 below)**

Kerry 15 contracts- 94.02ha of which Kerry LIFE total 54.71ha

Cork 5- 36.02ha, Offaly 4 -30.50ha, Clare 3 - 16.26ha, Mayo 3 -15.23ha.

Tipperary 2 -21.18ha one of which is 17.95ha in area.

Sligo 2 -15.64ha, Carlow 1 -11.74ha, Donegal 1- 3ha, Unknown 1 - 2.7ha



Graph 2 contract numbers in blue and hectares per county in orange

Of the 40 contracts illustrated above:

- 23 are within environmentally designated areas -57.5% of contracts
- 18 include non -designated Annex 1 habitats -45%
- 9 are within the 8 priority Freshwater Pearl Mussel (FPM) catchments -22.5%
- 9 are within 6km of other FPM catchments -22.5%

- 20 have Annex 4 species or habitats present -50%
- 18 have Annex 2 species or habitats present -45%
- 1 has a Flora Protection Order species present - 2.5%
- 31 are adjoining aquatic zones -77.5%
- 20 have some invasive species recorded -50%
- 0 sites were recorded as having 2<sup>nd</sup> round NWS Cons. funding (which can be applied for after 15 years) but the yes or no answer to this question was unknown for 24 contracts
- 4 sites recorded for Emergent woodland measure 16.09ha – 10%
- 1 site recorded for Neighbourwood scheme overlap 3ha –2.5%



*Figure 12 broadleaf restocking of part of a reforestation site in Co. Clare 2021*

### Felling and reforestation

Of the 20 contracts where there was a clear yes or no answer to whether it had an associated felling license: 14 yes and 6 no. -70% of those recorded had felling licenses in the system with them.

It was not clear with 19 other contracts whether there was a felling license associated with them or not, but it is assumed that many of these do (FS pers.com)

12 of the 14 contracts that had known associated felling licenses also had reforestation with native species recorded in them – 86%

3 of the reforestation sites also included areas of broadleaved high forest

11 of the 12 recorded reforestation sites were adjoining/linked to an aquatic zone – 92%

The river catchment within which the sites occur is not recorded as yet by the Forest Service.

## Questionnaire

Foresters and Ecologists on the approved NWS list plus planners and advisors in both public and private sectors will be circulated with the following questionnaire, prior to the first meeting of the TAP expert committee on NWS Conservation:

### **What were the impediments to the uptake of the scheme?**

- a. Having to commit to paying for an Ecological Survey and Management plan as part of the initial application before knowing whether grant aid would be received to cover the cost.
- b. The 12 hectare per annum limit to any application which was inconsistently applied
- c. The timescale between submitting a grant application and receiving approval
- d. The timescale between submitting a felling license application and approval
- e. Deer and fencing issues
- f. No flexibility to use browsing as a management tool e.g. for stimulating regeneration
- g. The lack of training opportunities for operative level staff.
- h. The lack of experience of contractors in NWS Conservation
- i. The premium level of €350/ha for 7 years
- j. No specific framework for calculating costs
- k. Fear of pressure to remove mature and overmature non-native components
- l. The difficulty in combining NWS Conservation and other schemes because it doesn't have a Grant Premium Category (GPC)
- m. The continued paper-based approach to administering the scheme.
- n. Fear of losing money by doing NWS Conservation contracts
- o. Other issues that you would like to raise

### **What should a comprehensive policy framework and a new semi-natural woodland strategy include?**

Based on what you've read in this discussion document and from your own experience and opinions please make suggestions or observations to our email contact:

[info@woodlandsofireland.com](mailto:info@woodlandsofireland.com)

## Conclusion

Adequate Native Semi-natural Woodland Conservation activity is fundamental both to a Forestry Programme based on Sustainable Forest Management and to achieving Conservation Objectives in environmentally designated woodlands. The data provided here indicates a gross underspending of funds allocated by the state, on behalf of citizens, for this purpose.

This discussion document (and accompanying questionnaire directed to practitioners) is intended to prepare for the engagement of stakeholders in a Technical Advisory Panel (TAP) expert committee to explore how issues preventing uptake of the NWS Conservation measures can be resolved. The TAP committee should include individual contractors, academics, representatives of government depts and agencies and ENGOS

*'I am afraid' said Illand, 'of the destruction of the forest'. This was reasonable. A hundred and fifty loads of wood used to be fetched into the house every morning and evening. Cano said 'in the undergrowth, you cannot cut wood from the slope so the forest does not face its ruin, but your destruction soon will be'. (c.9<sup>th</sup> century) Rayner 1988*

*Quote 3: Quote from Legends of the Kings of Ireland, The Story of Cano, Son of Gartnán*

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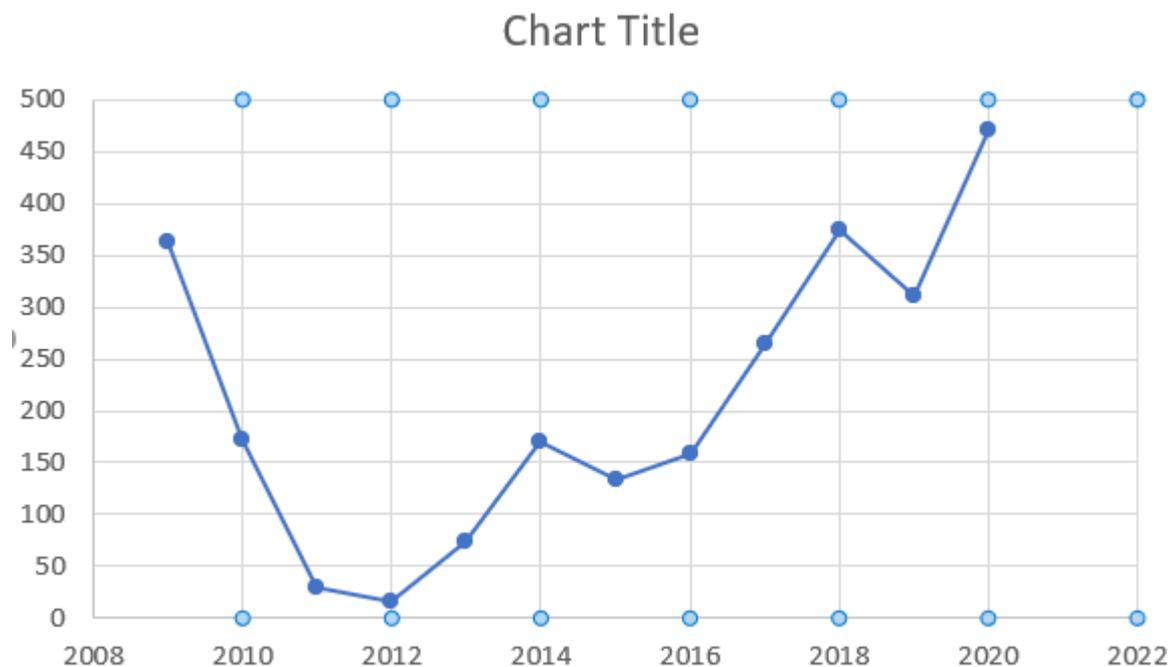


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Bia agus Mara**

## Appendix 1

The NWS establishment figure for 2020 was c.470ha reported at the Forestry Policy Group meeting in December 2020. The 2014-2020 target was 2,700ha total. It looks like the outturn will be around 1,900 or c.70% of target.

Native woodland establishment notes and graph data supplied by Forest Service in Autumn 2020



### NWS Establishment hectare numbers per annum on left of graph

- 2020 has seen the highest level of NWS planting on record, with 4 months of the year remaining.
- NWS is 22% of all planting so far in 2020, up from 2% from the beginning of the forestry programme (2015).
- This represents a 77% increase on NWS planting when compared to the same time last year despite lower levels of overall planting.
- This means the National Forestry programme has funded the planting of 1.3million native trees in 2020 to date
- 75ha Woodland Environment Fund (WEF) in total of which 66ha so far in 2020

## Appendix 2

### Native Woodland Scheme Conservation measures Contract Utilization Assessment Form- version 1. Sept. 2021

NWS Conservation contract	yes	no	Other relevant detail e.g percentage/subset/overlap
1 File reference number CN <i>(excel sheet Wexford or excel sheet)</i>			
2 Date received by DAFM <i>(first entry date on IFORIS)</i>			
3 Date approved for funding			
4 Public sector- Coillte or other <i>(excel sheet Wexford)</i>			
5 Private sector <i>(excel sheet Wexford)</i>			
6 Area (ha) <i>(excel sheet Wexford)</i>			
7 Townland and County <i>(excel sheet Wexford)</i>			
8 Catchment name <i>Leave blank – to be filled by Joe</i>			
9 Is Ecosurvey/Plan on file? <i>Will be yes in all cases</i>	X		All NWS conservation applications have to have a plan so it will be yes for every file.
10 Specify if High Forest (HF) or Emergent Woodland (EW)? <i>NWS Form 1 – NWS Conservation category (high forest or emergent woodland)</i>			
11. Is it within designated area (SAC/SPA/NHA/pNHA, Nature Reserve, National Park/Refuge for Flora and Fauna)? <i>NWS Form 1 –Section 4 Q1</i>			
12. In non designated areas, is there Annex I habitat present? <i>NWS Form 1 –Section 4 Q2</i>			
13 Is it within priority 8 FPM catchment? <i>-NWS Form 1 –Section 4 Q 3</i>			
14 Is it within 6km zone of other FPM catchment <i>NWS Form 1 –Section 4 Q 4</i>			
15. Is there Annex IV species or its habitat present? <i>NWS Form 1 –Section 4 Q5</i>			

16. Is there Annex II species or its habitat present? <i>NWS Form 1 –Section 4 Q6</i>				
17. Is there a population of a species protected under the Flora Protection Order 2015 (SI356 of 2015) present? <i>NWS Form 1 –Section 4 Q8</i>				
18. Is the application adjoining an aquatic zone? <i>Maps accompanying Form 1</i>				
19 Is it standard woodland conservation? (is it existing native woodland i.e. not conversion from conifers) <i>NWS Form 1 – NWS Conservation category</i>				
20 Is it part of a Neighbourwood plan? <i>NWS Form 1 – NWS Conservation category</i>				
21 Is it 2 <sup>nd</sup> round funding of NWS Cons? <i>NWS Form 1 – NWS Conservation category - Answer from question on "has work of a similar nature been supported by the Dept in previous 15 yrs"</i>				
22 Is there an associated felling license application? <i>Information may not be readily available</i>				
23. Does the application involve native species reforestation?				
24. Does the application involve control/removal of invasive species (e.g. Rhododendron)? <i>NWS Form 1 Section F Operations NWS Conservation Operations Table</i>				
Transferred data to the excel collation file?			X	
<b>Date of Assessment:</b>				<b>DAFM staff member signature:</b>