

## **Re: Forestry Schemes Review**

### **Wildfires: Forestry Scrub/Transitional Woodland Scheme**

Farmers claim that Area Aid payments are dependent on keeping their lands accessible to livestock or the land will be excluded from support payment. They argue that they can not permit reversion of their holdings to scrub.

Scrub is 'often found in inaccessible locations or on abandoned or marginal farmland'<sup>1</sup>. Scrub can contain many native species, e.g. hawthorn, blackthorn, gorse, juniper, bramble, roses, willows, small birches, stunted hazel, holly and oak. Scrub frequently develops as a precursor for woodland and its support offers the potential to allow for woodland regeneration on hillsides, riparian sites and bog margins<sup>2</sup>. No fertilisation or drainage is required. Tourism, biodiversity, soils and water all benefit by reversion to scrub.

To keep this land open farmers justify burning as a management tool<sup>3</sup> required for economic reasons.

But burning is an increasing economic and social problem in itself in rural Ireland. It is environmentally damaging to wildlife<sup>4</sup> and can lead to severe erosion through loss of vegetative cover and soil structure. Without any permit system or requirement for farm burning management plans, it is estimated that the direct economic losses due to burning have cost more than €2m this year so far in 5 counties.

Forestry plantations suffered significant losses. Coillte estimates that around 1,500 acres of forestry were destroyed by gorse fires so far this year<sup>5</sup>. In Kerry in the month of April there were more than 115 callouts for wildfires, placing fire fighters lives at risk and diverting fire fighting resources into remote areas where they are unavailable for domestic emergencies, etc. Climate change threatens to dry out Ireland's peatland to the point where furze will readily take root and gorse fires become a more serious menace.

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<sup>1</sup> A Guide to Habitats in Ireland, Fossitt, Heritage Council, 2000

<sup>2</sup> Ibid.

<sup>3</sup> This submission has been made after a debate on Radio Kerry between FIE and the IFA Glenflesk Branch Secretary of the Kerry IFA on recent fires. The interview is online at:  
[http://www.friendsoftheirishenvironment.net/cmsfiles/files/audio/Radio\\_Kerry\\_Burning.mp3](http://www.friendsoftheirishenvironment.net/cmsfiles/files/audio/Radio_Kerry_Burning.mp3)

<sup>4</sup> While new Regulations limit burning after the 1<sup>st</sup> of March rather than the traditional 15<sup>th</sup> of April to protect nesting birds, they are not enforced and in fact much of the worst of this year's burning came even after 15 April.

<sup>5</sup> Gerard Murphy, Managing Director of Coillte Forest, Leitrim Observer, 28 April 2010  
<http://www.leitrimobserver.ie/news/County-s-fire-crews-forced-to.6260221.jp>

Within a forestry grant-aided site up to 20% of the area can be given over to reversion to scrub, recognition of its contribution to forest cover. Support also exists through schemes in designated areas. But there is no direct scheme to support reversion to scrub as an alternative to the requirements of Area Aid.

Scrub would increase rather than decrease the national carbon store as opposed to burning and so would enhance the land's value as a carbon sink and store. Semi-native woodlands sustainably managed can provide posts, durable building/joinery materials, and fuel. A 4 hectare scrub woodland of YC 4 oak would provide 16 tons of hardwood firewood annually, contributing to a rural-based source of fuel, a valuable commodity under increasing pressure.

Grant aiding farmers to bring land under a Forestry Scrub/Transitional Woodland Scheme would increase the forest estate as scrub is included within the definition of forest cover used by Ireland in our National Forest Inventory.<sup>6</sup> It comprises 4% of the total forested area with some counties holding 15% of their forested area in scrub.

A targeted Forestry Scrub/Transitional Woodland Scheme would also address the general issue of 'desertification' where abandoned rural holdings would naturally revert to woodland but agricultural payments are only available subject to 'maintenance'.<sup>7</sup>

Such a scheme would be cost neutral as savings from Area Aid payments would be available for the Forestry Scrub/Transitional Woodland Scheme. There would be no establishment costs.

Friends of the Irish Environment

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<sup>6</sup><http://www.agriculture.gov.ie/media/migration/forestry/nationalforestinventory/nationalforestinventorypublications/4330NFIREsults.pdf> [Accessed 28 April 2010]

<sup>7</sup> The trend towards removal of small scale scrub with drainage is also increasing as part time farmers with access to idle machinery return from the building trade to their holdings through unemployment.