**Delivering a planting program**

**General**

Current, short term, government policy is to increase the annual afforestation program from its current low base of 6,500 hectares per annum to a minimum of 7,000 hectares for the next planting season and to progressively increase this total in a tiered manner subject to funds being available until we achieve a sustainable, meaningful program.

The eventual planting target has to be built up in conjunction with the nurseries over a 3 year period rising initially to 12,000 hectares and progressing onto 15,000 ha per annum.

The key barriers to achieving this initial 7,000 ha program are;

1. Improved returns from Agriculture and a resultant desire to hold and farm land.
2. Increased environmental constraints.
3. Lack of clarity in relation to the SFP
4. Changes to FS policy regarding the planting of unenclosed ground.
5. How the scheme is administered.

The onus to deliver Irish Forest Policy must lie with our Forest Service. There is an absolute necessity to actively manage the current tranche of form 1 applications submitted to the forest Service, to actively considering every acre submitted and to deal with these applications in a timely and efficient manner.

**What changes or improvements could free up constraints and improve land availability**

 **Forest Service**

1. FS to write to all holders of a current, in date, approval encouraging them to plant their land if they have not yet done so.
2. Forest Service to actively promote forestry in the media advising that Forest Policy and afforestation is high on this government’s agenda.
3. The FS need to develop a more promotional role over the afforestation program and not simply focus on a regulatory role. The role of the FS is currently envisaged as being that of an auditor. A number of promotianal events should be held in key forestry strong holds to promote planting.
4. Reduce the % of files being referred to NPWS. Make more decisions in house.

Due to staffing issues NPWS cannot administer to significient numbers of referrals within a time frame that facilitates prompt planting.

1. Turn around time needs to be addressed. The current 4 months plus to turn around form 1’s is simply too long. A specific customer charter should be developed.
2. Corrospondance tends to be negative between FS and customers. This is particularly true when an applicant recieves an approval which is full of “WARNINGS”. Whilst it is inmportant to flag pit falls it should also be possible to draft a document that is more possitive.
3. There needs to be consitancy amongst all inspectors in relation to YC and what is or is not plantable.
4. Fund a 1500 hectare planting program for autumn 2012 launching same in September 2012. Give the sector and those planting clarity and certainty ASAP.

 **Unenclosed land**

1. Any annual afforestation program can only be delivered from the land bank that farmers – land owners make available in that particular year. Accordingly trying to deliver an annual planting program on “good enclosed ground” in a period when agricultural income is improving and ambiguity exists in relation to SFP is not logical and is therefore flawed policy.

Afforestation policy must be flexible and must recognise the land bank that is available to it in any particular year. Accordingly if the type of land that is being presented for planting can change depending on the performance of Agriculture as a sector then policy must bend or flex with it and remove any barriers that may arise from time to time to land availability.

Accordingly for this season and possibly next season we need to review our policy in relation to productive unenclosed land and allow farmers plant same.

Applications with elements of unenclosed land should be considered on their own merits and a blanket approach to the 20% rule should be removed.

Productivity, size, location should all feed into a fair process that allows unenclosed ground to be planted and not subject to a 20% cap.

Indeed the best result would be to remove the unenclosed land category all togeather and to develop a “sensitive” category i.e. environmentally sensitive.

 The unenclosed grant and premium payments, reduced in 2010, need to be reviewed upwards.

 **Environmental constraints**

1. Review the Hen Harrier sensitive areas and review the quotas in same. The current quotas are too low and too penal and do not facilitate any meaningful afforestation.
2. We must consider re-opening the acid sensitive areas (10% of our land mass).

This land block has immense potential for planting going forward. We now need to consider the fact that atmospheric sulphur has decreased significiently over European air space and that Irish Forest policy cannot be influenced by pollution events in places as far away as China or India.

EPA restrictions are too penal and we suggest that a proactive approach rather than the current blanket ban be implemented (there is at least 500ha’s of planting per annum sitting in Acid sensitive areas).

 **SPS**

1. Prior to SPS clarity on an EU level the Department should give “comfort” to farmers in relation to the impact the new SPS scheme may have on their decision to plant.
2. Absolute clarity re; future SPS payments is essential……….the sooner it is provided the better.

 **Incentives…..premium levels**

1. Premium payments should be harmonised i.e. no differential between farmer and non farmer premium. The priority should be on planting hectares not necessarily on who plants these hectares.

The scheme should facilitate non farmers but also be capable of controling-excluding large scale institutional investors (particularly from abroad) and state owned forestry companies.

1. Incentivise scale and value for money i.e. pay more for larger blocks that are more commercially viable.
2. Review current fencing grant capped at 100m per hectare. Fencing costs are ruling numerous sites out of the program.

Yours Sincerely,

John O Reilly

Green Belt Ltd.