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Ms Janet Farrell,  
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Policy Section,  
Johnstown Castle Estate,  
Co. Wexford,  
Y35 PN52.

5<sup>th</sup> December 2022

Our Ref: SCP220701.2

## **Re: Draft Ireland's Forest Strategy Implementation Plan and SEA Environmental Report**

Dear Ms Farrell,

We acknowledge your notice, dated 19<sup>th</sup> October 2022, in relation to the Draft Ireland's Forest Strategy Implementation Plan (IFSIP) and accompanying SEA Environmental Report (SEA ER). We welcome the opportunity to engage with the process at this stage.

The EPA recognises the key role that the forest sector plays as an important source of CO<sub>2</sub> removal from the atmosphere and its central role in advancing the achievement of Ireland's environmental commitments towards climate neutrality by 2050. However, as highlighted in our latest State of the Environment Report [Ireland's Environment – An Integrated Assessment 2020](#) (EPA, 2020) afforestation and harvesting can impact negatively on water quality, natural vegetation, soils, biodiversity, and the landscape. When planted on peaty soils, forestry can also act as a source of carbon emissions, and ammonium emissions which impact on water quality.

The EPA is committed to working constructively and collaboratively with DAFM to provide the evidence base for assessing the impacts of forestry on the environment and to assist DAFM in developing and implementing plans and programmes that will maximise the role that forestry can play in addressing the climate emergency while also ensuring that Ireland's natural environment is protected and restored.

This submission is comprised of this cover letter setting out our key observations and four Appendices: Appendix I providing specific comments on the draft Ireland's Forest Strategy Implementation Plan (IFSIP), Appendix II providing specific comments on the SEA Environmental Report, Appendix III providing some technical comments on the draft Forest Strategy and Appendix IV referencing chapters in [Ireland's Environment - An Integrated Assessment 2020](#) as considered relevant to the IFSIP.

This submission builds on our previous EPA submissions to Department of Agriculture, Food and the Marine (DAFM) in relation to the Forest Strategy and Forest Strategy Implementation Plan:

- EPA Submission on “Shared Vision, Forest Strategy and Forestry Programme” (22<sup>nd</sup> February 2022).
- EPA Submission on the SEA scoping report for the Environmental Assessment of the Implementation Plan for the Forest Strategy for the period 2023-2027 (2<sup>nd</sup> August 2022).
- EPA Submission on the SEA screening for the draft Forest Strategy (26<sup>th</sup> September 2022).

The EPA is one of the statutory environmental authorities under the SEA Regulations. In our role as an SEA environmental authority, we focus on promoting the full and transparent integration of the findings of the Environmental Assessment into the Plan and advocating that the key environmental challenges for Ireland are addressed as relevant and appropriate to the plan. Our functions as an SEA environmental authority do not include approving or enforcing SEAs or plans.

## **Key Messages of this Submission**

### **1. Level of ambition**

The IFSIP should commit to a planned and sequential afforestation rate that can reasonably be expected to support achievement of the 2050 Climate Neutrality goal. The administrative structures must also be in place to ensure that the acquired afforestation rates can be achieved.

While there is significant uncertainty in calculating what will be required, it is noted that the proposed afforestation rate of 8,000 hectares per annum is lower than the stated goal of 15,000 hectares per annum in the 2014 National Forest Policy Strategy.

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.

As stated above, the EPA has previously highlighted to DAFM the importance of quantifying the extent of forestry that will be needed, consistent with Ireland’s climate commitments, to contribute to delivery of a 51% reduction in greenhouse gas emissions by 2030. The 8,000 hectares per annum afforestation goal set out in the IFSIP does not appear to be consistent with supporting achievement of the climate neutrality goal based on EPA-funded research<sup>1</sup>. This research found that between 13,000 hectares and 40,000 hectares per annum of afforestation would be needed from 2025 to 2050 to offset projected CO<sub>2</sub> and N<sub>2</sub>O emissions from the agriculture sector, with the lower level relying on a 75% reduction in agricultural emissions combined with a substantial rewetting programme of agricultural organic soils.

### **2. Water quality**

Both the Forest Strategy and the IFSIP should incorporate measures that will pro-actively and systematically address water quality issues associated with forestry activities.

The recent EPA Water Quality in Ireland 2016-2021 report states that 46% of Ireland’s surface waters are in moderate, poor or bad ecological status. 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.

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<sup>1</sup> <https://www.plantagbiosciences.org/project/sequester/homepage/>

Water quality impacts can arise due to acidification, nutrient and sediment mobilisation, and modifications to the physical habitat conditions of water courses through drainage. These impacts occur during forestry activities such as planting, thinning and clear-felling can cause a substantial decline in water quality, by as much as two or sometimes three status classes. Once the forests become stable, the water bodies can recover within a few years.

The IFSIP should emphasise how forestry can achieve multiple environmental benefits in a catchment context. For example, planting native woodland in low-lying poorly drained riparian zones can provide multiple environmental benefits.

### **3. Integration of the environmental assessments into the IFSIP**

The IFSIP should include a clear commitment to integrate and implement the recommendations and mitigation measures identified in the SEA Environmental Report (SEA ER). The integration of the SEA ER in the IFSIP will maximise the potential for overall positive environmental outcomes.

This integration is essential to ensure that the IFSIP successfully advances the achievement of Ireland's commitments towards climate neutrality by 2050, while also protecting and improving water quality and biodiversity.

### **4. Implementation, training and resources**


The IFSIP should promote compliance with the extensive suite of forestry guidelines and policies available, including those relating to water quality. DAFM should ensure a governance structure is established 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.

Approximately fifty percent cent of forestry activity in Ireland occurs on privately owned lands which limits the scope to drive the implementation of forestry measures in areas where they would have the most environmental benefits. In this regard, the IFSIP should include a commitment to engage with, and further incentivise, those private landowners that have the greatest opportunity to drive multiple environmental benefits from forestry in the right places. This could be supported by the use of spatial analysis and forestry specific environmental sensitivity mapping.

There is merit also in preparing a checklist for applicants for afforestation licences/permits and for Registered Foresters, incorporating the relevant mitigation measures from the SEA ER. This checklist should be incorporated into the authorisation process through the IFSIP.

If you have any queries or need further information in relation to this submission, please contact Suzanne Wylde, Strategic Environmental Assessment Unit directly. I would be grateful if you could send an email confirming receipt of this submission to: [sea@epa.ie](mailto:sea@epa.ie).

Yours sincerely,



**Dr Eimear Cotter**

*Director*

*Office of Evidence and Assessment*

## APPENDIX I: SPECIFIC COMMENTS ON THE DRAFT IFSIP

### Scale of afforestation

As per the EPA letter submission to DAFM in February 2022, the national policy position of carbon neutrality by 2050 will depend on the forest sector to act as a carbon sink to offset residual emissions.

We have previously highlighted<sup>2</sup> that it will be important to quantify the extent of forestry that will be needed in Ireland, consistent with meeting Ireland's climate commitments, and work backwards from there to determine the level of annual afforestation necessary to achieve that overall target. The 8,000 ha per annum afforestation goal does not appear to be the result of such analysis, but rather a continuation of existing goals stated in the 2021 Climate Action Plan (also in the 2019 Climate Action Plan). It should be noted that the stated goal of the 2014 National Forest Policy Strategy<sup>3</sup> was higher, seeking to achieve 15,000 ha per annum afforestation. While there is significant uncertainty in calculating what will be required, dependant on the residual emissions expected from other sectors in 2050, a range can be reasonably estimated (e.g. the work done for the EPA funded SeQuester project that supported the Climate Council's carbon budget deliberations<sup>4</sup>) and then refined on an ongoing basis (e.g. incorporating newer research or more accurate models).

The SeQuester analysis found that between 13,000 ha and 40,000 ha per annum of afforestation would be needed from 2025 to 2050 to offset projected CO<sub>2</sub> and N<sub>2</sub>O emissions from the agriculture sector, with the lower level relying on a 75% reduction in agricultural emissions combined with a substantial rewetting programme of agricultural organic soils. The proposed 8,000 ha afforestation target does not appear to be consistent with meeting the climate neutrality goal based on this analysis.

The IFSIP (or the Forest Strategy) should commit to a planned afforestation rate that can reasonably be expected to meet the forest sectors contribution towards Ireland's 2050 Climate Neutrality goal and include supporting evidence (or a summary thereof) that details the assumptions inherent in this assessment. Failing that, an alternative approach could be for the IFSIP to commit to undertaking a needs assessment and revising the afforestation rate at the mid-term review based on the outcome of that work. This could be included in the IFSIP as an explicit Measure under Intervention 1: Forest Creation.

### Water quality

The recent EPA Water Quality in Ireland 2016-2021 report states that 46% of Ireland's surface waters are in moderate, poor or bad ecological status. Water quality continues to decline and the number of monitored water bodies in satisfactory condition (high or good status) has also decreased since the last assessment period. Of this, forestry is the third most significant pressure impacting on water quality and there has been little net change in the relative scale of its impacts since the previous national water quality assessment.

The available evidence shows that water quality impacts from forestry can be caused by loss of sediment, nutrients and chemicals, and by alteration of the physical habitats (hydromorphology) of streams. These impacts occur during afforestation, deforestation and thinning, and when ground conditions are disturbed, especially when the soils are organic as they are typically less stable than mineral soils. These impacts can often cause substantial declines in water quality, dropping by two or sometimes three status classes.

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<sup>2</sup> Letter of February 2022, referred to in the cover letter.

<sup>3</sup> [gov.ie - Forests, Products and People - Ireland's Forest Policy, a Renewed Vision \(www.gov.ie\)](https://www.gov.ie/en/publications-and-resources/publication/forests-products-and-people-ireland-s-forest-policy-a-renewed-vision/)

<sup>4</sup> [AFOLU Briefing Note UL.pdf \(climatecouncil.ie\)](https://www.climatecouncil.ie/AFOLU/Briefing_Note_UL.pdf)

In the past, the wrong trees have been planted in the wrong places (e.g. conifers on organic soils in upland areas) which has given rise to a significant legacy issue relating to water quality that needs to be managed as these trees mature and are harvested.

### National Ecosystems Monitoring Network

The National Ecosystems Monitoring Network (NEMN), established under the National Emissions Ceiling Directive, includes some forest sites. The EPA have been collaborating with the Forestry Section of DAFM on this work, including soil, moss sampling and air monitoring sites. The IFSIP should include a commitment that DAFM will continue to support the network given its importance as a key network that will assist in monitoring the impact of air emissions on ecosystems, including forests.

### Monitoring, Management and Implementation

We note the inclusion of the section in the IFSIP relating to Governance and Monitoring. This section would benefit from further detail in terms of monitoring and implementation. This section could commit to being implemented and reviewed over the lifetime of the IFSIP. A set timeframe for review of the implementation measures would provide an opportunity to evaluate delivery and to reflect relevant external changes, including environmental considerations. This could prove to be key in terms of ensuring that the implementation of the IFSIP remains aligned with other key national policies and plans in relation to climate, land, biodiversity and water management.

Furthermore, the section on governance and monitoring should provide clarity on responsibility of specific organisations for the implementation of specific measures.

We recommend aligning the implementation monitoring/reporting of the IFSIP with the environmental monitoring required under the SEA legislation. This would enable the environmental performance of the IFSIP to be evaluated and provide for increased transparency during implementation. There may be merits in aligning the periodic reviews of the IFSIP 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 IFSIP.

In order to accurately reflect the impact of the forestry measures described in the IFSIP on greenhouse gas Inventory and Projections reporting, detailed information on the environment (e.g. soil types) and nature of forestry activity and management will be required. It is important that in the operation of schemes (such as the draft Native Woodland scheme) that the requirement to capture such data for emissions estimation purposes be explicitly noted, feeding into the monitoring goal described in Action 39 of the IFSIP. The EPA is happy to engage with DAFM, to discuss in detail, what exact information will be required.

As noted in the EPA's earlier letter (February 2022), and also throughout the IFSIP, for forestry to deliver the contribution expected in meeting Ireland's climate targets it is important that forests are "well managed". The required regulatory oversight to ensure this, could feasibly also produce the detailed information needed to accurately reflect activities in the greenhouse gas Inventory.

Legislation and an extensive suite of best practice guidance for forestry activities are in place that should prevent impacts to water quality. However, as stated above our evidence shows that water quality impacts are still occurring. DAFM should ensure a governance structure is established that the available guidance and protocols are implemented in full to mitigate against forestry activities having an impact on water quality.

## APPENDIX II: SPECIFIC COMMENTS ON THE SEA ENVIRONMENTAL REPORT (SEA ER)

### General Comments

The EPA's key observation with respect to the SEA ER is the apparent lack of integration of the findings of the assessment into the IFSIP itself. The SEA ER does not provide clarity on how the process was undertaken in conjunction with the development of the IFSIP.

We note that a Natura Impact Statement has been prepared in support of the IFSIP, which includes mitigation measures. 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 IFSIP.

As a general comment, the index for page numbers has not been updated and is not reflective of the position of the various discussion topics within the document. This should be updated in the interests of clarity prior to finalising the documents.

### Consultation

The intention to undertake non-statutory consultation with the environmental authorities in Northern Ireland for the draft plan and SEA ER was referred to during the SEA scoping stage. A reference to this consultation and its outcome should be included in the SEA ER as relevant.

The relevant requirements of the SEA protocol<sup>5</sup> under the ESPOO Convention should be taken into account, for any transboundary consultations with non-EU Member States.

### Alignment with Plans & Programmes

DAFM should ensure that the IFSIP aligns with key relevant higher-level plans and programmes and is consistent with the relevant objectives and policy commitments. This includes the Common Agricultural Policy Strategic Plan 2023-2027 and its guiding European legislation; the Climate Action Plan 2022 (and the upcoming Climate Action Plan 2023) and the relevant aspects of the draft River Basin Management Plan 2022-2027.

We welcome the inclusion in the SEA ER of the schematic illustrating the national & European policies and plans with which the IFSIP is linked. It would be useful to include a similar schematic within the IFSIP itself. This would help to identify areas where there are interlinkages and dependencies to ensure full implementation of the various policies and legislation. Clarity should also be provided on how Coillte's policies/strategies for management of forests and forestry activities relate to the IFSIP.

It would be useful to include some discussion in the SEA ER relating to the 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.

### Likely evolution of the current state of the environment

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 SEA ER should include a description of the likely evolution of the current state of the environment without the implementation of the plan. This is an important element to include, as the environmental baseline at the end of the plan period may be quite

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<sup>5</sup> UNECE Protocol on Strategic Environmental Assessment to the Convention on Environmental Impact Assessment in a Transboundary Context



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 IFSIP this analysis could look at the increase/decrease of afforestation rates without the plan, floods and droughts affecting tree/forest health, etc.

#### Existing environmental problems

The SEA ER should more clearly and thoroughly address existing environmental problems. The SEA ER makes reference to some existing environmental problems, such as the fact most of Ireland's forest cover is monoculture conifers, issues with dieback and excessive levels of nutrients entering water courses. The discussion on these environmental problems should highlight which issues are the most significant in terms of affecting the IFSIP. It would be useful for the SEA ER to include a section that summarises the environmental problems associated with the environmental topics in this regard.

#### Trends for key environmental receptors and the environmental baseline

The SEA ER references past environmental trends. 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. It would be useful for the SEA ER to have carried out an assessment of likely future trends. 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.

The 4<sup>th</sup> National Biodiversity Action Plan is being finalised by the National Parks and Wildlife Service at present. Reference to any actions included in the draft plan that relate to forestry activities should be included in the environmental baseline for the SEA ER.

In addition to the CORINE data used to identify land use, land use change and forestry, the OSI will shortly be launching detailed high resolution landcover maps. These maps, developed in partnership with EPA, will help to identify landcover categories at a much greater resolution to that shown in CORINE. These maps will be an important resource for future forest management and forward planning, during the lifetime of this plan.

#### Cumulative effects and sensitivity mapping.

Our submission at the scoping stage noted that the Environmental Sensitivity Mapping (ESM) webtool ([www.enviromap.ie](http://www.enviromap.ie)) could help to support other environmental assessment findings. Tools such as the ESM Webtool would assist in identifying areas of particular environmental sensitivity during planning for new forest developments at a county, regional or national level. This would ensure particular sensitivities are recognised early on and the appropriate measures established and implemented. Identifying environmentally sensitive areas early also helps avoid significant cumulative effects across multiple sectors in the course of forward planning activities.

The SEA ER includes a very useful map of environmental sensitivity (Page 187). However, it is not clear how this map was used to inform the development of the IFSIP. The SEA ER refers to 'environmental sensitivities' but not in the context of the map presented in the report. The IFSIP would benefit from incorporating a spatial element, taking into consideration the sensitivity map. It is important that the IFSIP focusses on preventing negative impacts from forestry, particularly in highly sensitive areas. The plan should ensure that the principle of '*the right tree in the right place*' be informed through spatial analysis and the use of sensitivity maps.

The competing land needs of forestry and renewable energy, in line with the national targets for both sectors in the IFSIP 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.

## Alternatives

The SEA Environmental Report includes an assessment of alternatives. The alternatives presented are:

- Do nothing (do not launch a new Forestry Programme);
- Continue with the current Forestry Programme 2014-2020; and,
- Prepare a new implementation plan with Forest Action Plan and Forestry Programmes of Measures and Interventions.

In line with the recommendations in the EPA's guidance document [\*Development and Assessing Alternatives in Strategic Environmental Assessment\*](#) the alternatives presented in the SEA ER should reflect the decisions taken during the development of the plan and should be developed through close collaboration between the planning and SEA teams. The plan-making and SEA processes should be clearly interlinked. The alternatives assessed should be realistic, reasonable, viable and implementable.

The alternatives presented in the SEA ER could be enhanced by considering different levels of ambition for achieving or surpassing environmental targets (e.g. a range of afforestation rates, different forest types beyond the 12 considered) and considering delivery of all elements of the IFSIP equally, or on a phased or priority basis. These may be more informative alternatives to consider in order to help deliver on the various actions outlined in the IFSIP.

It may also have been useful to have referred to the alternatives considered under the environmental assessment of the previous forestry programme and how they differ to those considered under the present iteration.

## Mitigation Measures

The SEA ER provides an extensive list of mitigation measures in Table 9.1 Mitigation Measures. There are also further additional mitigation measures listed in Appendix C of the SEA ER, relating to measures already incorporated in various DAFM documents. However, the mitigation measures listed are measures already incorporated in various DAFM guidelines, standards documents and policies. It is unclear how the two sets of mitigation measures relate to each other. Furthermore, the mitigation measures apply to forestry activities rather than the IFSIP itself. The mitigation measures do not clearly relate to the likely significant impacts of implementation of the plan, as is required by the SEA Directive. The challenge will be to ensure that the mitigation measures proposed will successfully mitigate the identified impacts of the IFSIP. It is not clear if the mitigation measures currently proposed will meet this challenge, in particular any cumulative or in-combination impacts of the implementation of the IFSIP.

There is merit in preparing a checklist for applicants for afforestation licences/permits and for Registered Foresters, incorporating the relevant mitigation measures from the SEA ER. The IFSIP should state that applicants will need to complete the checklist as part of the authorisation approval process.

## Monitoring

Table 9.2.1 of the SEA ER sets out the proposed monitoring measures for the IFSIP. This includes information on the frequency and responsibility for monitoring those particular aspects and the various sources and suggested indicators for the relevant environmental criteria.



The proposed SEA monitoring framework does not focus on the main predicted significant impacts of the plan. It includes an extensive list of indicators, but these relate to general environmental trends rather than the specific impacts of the IFSIP.

The IFSIP acknowledges the importance of forests to our health and wellbeing in terms of access to nature and the human interaction with forested areas. The SEA ER notes the potential for significant effects in this regard. These could be taken into account in the SEA Monitoring programme.

Guidance on SEA-related monitoring is available on the EPA website at <https://www.epa.ie/publications/research/environmental-technologies/research-306-guidance.php>

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. The monitoring programme should set out the various data sources, monitoring frequencies, responsibilities and reporting.

If the monitoring identifies adverse impacts during the implementation of the IFSIP, DAFM should ensure that suitable and effective remedial action is taken in a timely fashion.

#### Integration of SEA into the IFSIP

The mitigation measures and recommendations from the SEA Environmental Report should be incorporated into the IFSIP.

The IFSIP would benefit from the inclusion of a section or chapter related to “Environmental Assessment” showing how the assessment process and the SEA recommendations have been integrated into the IFSIP. In particular, the IFSIP should include clear commitments to implement the recommendations and mitigation measures identified in the SEA ER.

Similarly, the IFSIP should include an additional table related to how the findings and recommendations of the Appropriate Assessment have been reflected in the final plan.

#### Future Amendments to the IFSIP

Any future amendments to the IFSIP should be screened for likely significant effects, using the same method of assessment applied in the “environmental assessment” of the IFSIP.

#### SEA Statement – “Information on the Decision”

Once the IFSIP is adopted, an SEA Statement should be prepared that summarises:

- How environmental considerations have been integrated into the IFSIP;
- How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the IFSIP;
- The reasons for choosing the IFSIP 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 IFSIP.

A copy of the SEA Statement with the above information should be sent to any environmental authority consulted during the SEA process.

Guidance on preparing SEA Statements is available on the EPA website at the following link: <https://www.epa.ie/publications/research/environmental-technologies/research-306-guidance.php>

### Environmental Authorities

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.

### APPENDIX III: TECHNICAL POINTS IN RELATION TO THE DRAFT FOREST STRATEGY

A number of technical points are highlighted below that should be addressed in finalising the Strategy and IFSIP:

- The forest area referenced (first reference on page 4 of the draft Strategy) 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 4<sup>th</sup> Forest Inventory this should be noted.
- Related to the above, we believe the “*carbon reservoir of 312 million tonnes of carbon*” referred to on page 8 of the draft Strategy 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.
- The Strategy makes reference to the psychological benefits of green and blue spaces in a very generic manner. The EPA recently published several key pieces of research relating to protecting and developing Ireland’s green and blue spaces<sup>6</sup>. This research may provide more specific information.
- There appears to be text missing from Box No. 4 on page 33 of the draft Strategy on land availability and alignment of land uses.
- Given the expected imminent launch of the 2023 Climate Action Plan, the indicators box on page 40 of the draft Strategy should refer to CAP 2023 rather than CAP 2021.
- Though potentially covered under more general headings, the national and international priorities and policies list on page 40 of the draft Strategy could explicitly mention the reporting requirements of the LULUCF regulation (and expected updates due to fit-for-55) given the significance of it to EU reporting and compliance.
- There are numerous instances of climate adaptation being misspelled as adaption.
- There is an opportunity in Section 2 of the draft Strategy “Supporting Climate Action” 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 CO<sub>2</sub> emissions, impact, as already seen in the EPA’s most recent National Inventory Report<sup>7</sup> and highlighted in the EPA letter of February 2022.
- Finally, there is reference throughout the document to public consultation. However, it may be useful to include a section in the Strategy describing the consultation process in more detail, including links to any published or supporting information in this regard.

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<sup>6</sup> [Final Brochure Protecting-and-developing-Irelands-GB-spaces.pdf \(epa.ie\)](https://www.epa.ie/publications/monitoring--assessment/climate-change/air-emissions/irelands-national-inventory-submissions-2022.php)

<sup>7</sup> <https://www.epa.ie/publications/monitoring--assessment/climate-change/air-emissions/irelands-national-inventory-submissions-2022.php>

## APPENDIX IV: KEY CHAPTERS OF IRELAND'S ENVIRONMENT – AN INTEGRATED ASSESSMENT 2020

Chapter 2 of the SOER2020 relates to [Climate Change](#). This chapter clearly states the scale and pace of greenhouse gas emissions reductions must accelerate. It also notes that, in Ireland, forest-based solutions are currently the main focus for GHG removals. We must maximise the use of land as carbon stores, for example through grasslands, wetlands and forestry, to meet targets.

Chapter 7 of the SOER2020 relates to [Water Quality](#) and identifies forestry as a significant pressure on our waters. The chapter focuses on the dramatic reduction in pristine waters from 500 in 1990 to 20 in 2020. It notes that the challenge now, in relation to forestry and water, will be to ensure that the environmental stipulations in forestry licences are being adhered to while at the same time encouraging and supporting the uptake of forestry related environmental schemes such as the Native Woodland Establishment Scheme and Forestry for Water Measure.

Other chapters in the SOER2020 may also be useful to consider in finalising the forestry plans including land and soil (Chapter 5), nature (Chapter 6) and environmental health and wellbeing (chapter 14).

These chapters should be consulted along with the related Key Messages prior to finalising IFSIP and the SEA process.