



THE WOODLAND LEAGUE

OBSERVATIONS on FOREST STEWARDSHIP COUNCIL (FSC) PROCESS in IRELAND March 2004

INTRODUCTION

The Woodland league aims to restore the relationship between people (communities) and their native woodlands. Via Agenda 21 and networking with like minds, establishing native nurseries, sharing information on a central database, woodland walks and generally raising awareness of the importance of local trees for local conditions in conjunction with the international biological treaties Ireland has signed up for on behalf of the Irish people.

The UN framework convention on climate change embraces the principles of Agenda 21 and recognises the important role of Native forestry with regard to biological diversity, increased habitats and benefits socially and economically for local communities.

The most important aspect of Agenda 21 is public consultation. The Woodland league is a focus group that has been quietly consulting communities and individuals affected by the FSC certification process.

Ted Cook, a Native Woodland specialist, actively planting and propagating native trees, Heritage specialist (subject: Native trees), Wildlife lecturer, broadcaster and writer, cross community work in Northern Ireland. *Ted acts as an Environmental and Technical Advisor*, and is a stakeholder in FSC process. He remains an active contributor to a number of Draft Heritage Plans at invitation of a number of Local Authorities.

Andrew St. Ledger is an Artist, Wood sculptor, Heritage specialist (subject: Traditional woodcrafts and Native trees), Chair of Craft woodworker's of Ireland, a director in the Irish Hardwood Council (Promoting use of native hardwoods) *Andrew acts as PRO* and is also a stakeholder in FSC process.

Brendan Kelly is an Organic farmer and acts as a *Liaison officer* for Woodland league with Helen, his wife. Brendan is also a stakeholder in FSC process.

We have additional technical support from Dr Ray Monahan, lecturer in Tralee University and longterm critic of Irish Forest policy.

Fintan O'Toole, a respected *Irish Times* Journalist/ Author, with a proven track record in highlighting social injustices, recently wrote an article outlining how the Environmental sector in Ireland has been under sustained attack by the Irish Government for the last 7 years in order to facilitate unbridled, unsustainable development, during the so called "Celtic Tiger".

In this context the Irish Forestry Certification Initiative (I.F.C.I.) must be examined, we also remind you that a complaint has been sent to the company's office regarding I.F.C.I. breaches of procedure as well as irregular bookkeeping. These developments are very serious and we urge the Soil Association to reflect on this in their assessment of Coillte's certification. The Soil Association have an opportunity at this time to help establish a real Sustainable Forestry Policy in Ireland, with a level playing field for all stakeholders simply by applying the FSC principles the Soil Association claims to endorse.

FURTHER INPUT AND SUPPORT FROM:

Monivea, Balrath, Derrybrien communities,
Camolin environmental group,
Macroom and district environmental group,
West Limerick and district environmental alliance,
Clare Environmental Alliance Group.
Shippool Woods (Ted Cook as member of International tree foundation, consulted with local community)
David Wilcox: South Wicklow countryside awareness.
Larry Messick: Local trees for local conditions.
Dr Anne Behan: Ecologist (resigned from IFCI) Recently sadly deceased. R.I.P.
Dr Etienne Rynne: Archaeologist Galway University.
Jacinta French: Environmentalist
Ciaran Hughes: Engineer / People against Pesticides
Forest Friends: John Haughton (ex-Town Planner)
The Brehon Law project: Mr Vincent Salafia.
Patricia McKenna MEP Green Party.
Nth Ireland Woodland trust.

From these sources we have compiled a sustainable draft forestry plan as well as a dispute resolution mechanism using Brehon law. The Woodland League is a not for profit entity, and not a limited company, but we are a registered Partnership.

We will reiterate our comments on the International reputation of the Soil Association and the lasting legacy of its founder members in promoting organic (common sense) agriculture and forest systems that respect the natural world. Intensive farming and Intensive forestry are both dependent on chemicals mainly from the petrochemical sector looking for new markets for its products.

The Soil Association is now faced with endorsing intensive forestry as carried out by Coillte, who adopted a U.S. pesticide riddled monoculture model of forestry, dependent on grant subsidies with its focus aimed at supplying cheap woodpulp to the chemical dominated paper industry. This symbiotic relationship suits a minority of players as we are sure you know, it has nothing to do with community forestry or Sustainable forestry. The principles of FSC are so much at odds with what is happening in Ireland that we call for a suspension of the Certification process until a proper draft standard and procedures agreed by all are in place.

The opportunity to create a new standard for Sustainable Forestry in Ireland in partnership with local Communities as is their right under Agenda 21 has been wasted by the charade of the IFCI steering group do date. The Soil Association can now correct this anomaly and move the process forward.

WE WOULD NOW LIKE TO MAKE THE FOLLOWING OBSERVATIONS REGARDING COILLTE'S FSC CERTIFICATION.

1.

The Draft Standard adopted by IFCI is a copy of a UK standard copied by Mr Tony Mannion (ex Coillte employee, not an independent choice) with minor changes to adapt it to Ireland. The social and environmental NGO's were led to believe this was a consultation document instead once they had engaged with it, this draft was deemed to have been accepted by all, with its watered down FSC

principles. The out of date (1983) Brundtland definition of Sustainability is the preferred definition for the Mannion document. The Rio definition from 1992/93 is internationally recognised, and by FSC international. Consult Macroom & District environmental groups submission to IFCI dated 30th March 2000 Re: FSC second draft, 1999. It is this weak draft standard, which is the basis of all the problem's to date in IFCI thereafter.

The Woodland League proposes a standard after consultation with social and environmental N.G.O.s (Copy enclosed)

2.

Please investigate whether Coillte have produced Independent Engineers and Archaeologist reports concerning the 241 km at least of new roads built on hilltops. Ref: Derrybrien landslides, using EU funds meant for local communities and small farmers clarified by EU Court decision 2003 asking for the return of €80 million, the Court stated Coillte (Irish Forestry board) were a State Company and not a Private entity as they tried to claim, when appealing the EU decision.

Irish environment law states any quarrying more than 2.9 ha in coverage requires an E.I.S. . 241km x 5m width constitutes a lot of 2.9 ha quarries. A spokesman for Hibernian Windpower admitted quarrying occurred at Derrybrien for road building and for the concrete platforms to hold the turbines, he used a phrase unheard of: borrow pits, these happen where the landowner claims the right to take raw materials from one part of a construction site to another, no doubt he used the Brundtland definition to justify this new phrase.

3.

Derrybrien Community and the Irish Peatland Conservation Council made submissions to IFCI expressing concerns at developments ongoing at Derrybrien including road building and clearfelling. IFCI's Caroline Murphy ignored these submissions along with many other submissions we believe, once again undermining the public perception of credibility in the consultation process the bedrock of Agenda 21. The Woodland league joins the Knockmealdown protection Committee, c/o Willie O Donoghoe, Crowhill Upper, Cappoquin, Waterford; in calling for no further wind turbine developments until Ireland has a cogent national policy. The ESB managing director, Mr Kieran O'Brien has formally warned that the existing amount of windpower does pose an increased risk to the security and stability of the power system. The ESB is the semi-state company responsible for electricity in Ireland and is connected to the subsidiary, Hibernian Windpower, active at Derrybrien.

Woodland League is calling for a halt to Coillte selling off public hilltops to the highest bidder. Hilltops are a particularly sensitive landscape feature for local communities and require proper consultation before any changes in use. We understand parts of Derrybrien site were designated as commonage, like a lot of bogland in Ireland. It appears that Coillte encroached on Derrybrien commonage, this needs investigation.

The social and environmental chambers of IFCI were not activated in relation to Derrybrien (how widespread is this). There appears to be a conflict of interest between 2 semi-state bodies, ESB (Electricity Supply Board) and Coillte (Irish Forestry Board) carving up public lands for the benefit of new private development companies, ie. Hibernian Windpower.

The Derrybrien landslide is currently being investigated by the European Environment Commission.

4.

The Woodland League require a report on the felling of Camolin Wood, the ancient semi-natural woodland of extreme biological significance, as stated by Ted Cook from his studies of this old woodland from 1972 until its sad demise in 2000. This was sessile oak wood, with a holly understory. The sessile oak, being Irelands highest ecological achievement, Ted Cook maintains

this wood should have been an important genetic reservoir and seedbank. In his opinion the loss of this fine specimen woodland was a major loss to the biological heritage of this country. The native trees' DNA has evolved and adapted to Ireland's location, climate, etc. over thousands of years.

Mr Declan Little, ecologist & current Chairman of IFCI (said to have studied in Camolin wood and other old woods while doing his thesis) headed the company: The Millennium Woodlands of Ireland (a review is asked for) established to plant a broadleaf tree for every family in Ireland, as a Millennium gesture on behalf of the state. Camolin Wood was chosen as a site, as part of this project, fully supported by Coillte. The new trees, which may not be native provenance were planted for numerous Irish families to celebrate the millennium and planted on the site of wilful destruction by those entrusted with managing the Irish forests. Ted Cook formally raised this matter with Caroline Murphy of the IFCI steering group in 2001, the year Coillte were certified with IFCI. Caroline Murphy was recently queried about this matter, and responded that she did not have time to process this submission. Ted Cook's plea was ignored. The vandalism of Camolin, by those entrusted with it, is in complete defiance of the Rio de Janeiro document on biodiversity which Ireland is a signatory. This states categorically that old genetic strands must be protected for the future.

Why was Camolin Wood not considered for Coillte's conservation strategy designed to take into account the requirements of FSC certification, the EU Habitats and Wild Birds Directives (1992 & 1979 respectively) and national policies in relation to biodiversity and nature conservation, i.e. the Rio de Janeiro document.

5.

Coillte have failed to provide adequate grazing areas/shelters for wild deer and goats in their management plans. The unsupervised culling of wild goats has just occurred in the Clare Galway regions of 4000 goats. Mr Liam McCarry, a member of the Heritage Councils wildlife advisory group and the Irish deer Society was critical of Coillte for failing to take deer stocks into account when planting new forestry as well as failure to plan grazing areas into their plans. He also mentions a need for a new census of the country's wild herd, as at present there are no proper figures.

6.

We note there is no allowance for Indicators, i.e. examples of non-compliance and verifiers, i.e. acknowledgement of complaint by Coillte and response in Tony Mannions draft standard as required by FSC principles and criteria.

7.

The social aspect of FSC principles needs to be decoupled from the environmental aspect as they are currently intertwined and neither defined properly, this obfuscates both areas and creates confusion/grey areas which suits completely the economic agenda of IFCI. This is causing internal strife within the social and environmental chambers. Caroline Murphy and Ruth McGrath do not seem to understand the nuances and complexities of each chamber, particularly the social aspects. This is borne out by a question I put to Tony Lowes and C. Murphy at an environmental conference organised by Tony Lowes and FIE in the Allihies 2003, in a Forestry (FSC) workshop, I asked where does social forestry fit in their agendas regarding FSC to my astonishment they replied that importing of Tropical Woods were impacting on 3rd world communities depriving them of a (local) resource. They could not see the full social impact on local communities in Ireland brought about by forestry activities i.e. Loss of Common's, Visual and Psychological impact of Coniferisation, water quality diminished by pesticides and acidic roots, old rites of way, mass rocks/ archaeology impacted upon, fishkills, local resource removed by trucks after clearfelling, impact of trucks on local community, little or no local benefits, in the event of older broadleaf forests the loss of

cultural heritage and biodiversity, the loss of hillsides to large scale windfarms with no benefit to local communities. The stunting of real economic potential for forest communities which derive from multi use native broadleaf forestry.

In order to understand social forestry in an Irish context we need to look back to the 1950's, to a History of Irish Forestry by Eoin Neeson, "Besides mutual self-help between landowner and state (or other trustee) the idea of social forestry also incorporates the proposition that the commercial consideration of producing commercial timber quickly and easily as the sole criteria for afforestation grotesquely distorts the role and function of Forestry. It is held with considerable conviction that forestry has an essential environmental – and therefore social – role antecedent to commercial management and not less important to the community as a whole. The complexities of balancing commercial and social aspects are well illustrated in the case of Coolattin Woods in Wicklow, part of which were clearfelled in the 1980's, the remainder being reprieved by last minute political intervention from the then Taoiseach C.J. Haughey." The Woodland League are opposed utterly to the current notion and practice of timber production as an exclusive goal in relation to Ireland's Old Growth and Commercial Forest sector. Modern Ireland has never had any social forestry, therefore implementing FSC policy in Ireland is extremely difficult. A Social Policy needs to be created, IFCI had the opportunity to address this but to date have failed to implement this vital component of the FSC process.

8.

Members of Balrath Woodland Preservation Group have accommodated Coillte through consultation for the past 2 years, to put in place a proper management plan for Balrath Woods. The draft proposals by Coillte have been shown to be inadequate and are biased entirely on the harvesting of mature oaks. Ted Cook examined these draft plans on behalf of the local people (his report is available if requested) The Balrath locals are happy to have Ted Cook as their environment consultant when a plan for Balrath agreed by all is in place. In the meantime Balrath have asked the Woodland League to raise their concerns at what they see as a failed and unsatisfactory consultation process. We urge you to examine Coillte's file on Balrath and consult Balrath people at the same time, should you need more information.

9.

A question on the NGO's of IFCI. The Heritage Council (state funded), Society of Irish Foresters, (lobbyists for conifers), Irish Timber growers (lobbyists for conifers), Millenium Woodlands of Ireland (set up by Coillte and Forest Service with Declan Little, ex-Coillte employee at helm), CRANN (most of its funding since 1999 came from Forest Service/Coillte)are pro FSC and its chairperson Jan Alexander was a Coillte director during some of this time. FIE (closely connected to An Taisce a state funded body) therefore indirectly state oriented

Are these NGO's sufficiently independent and as aware of social forestry issues for this delicate process. The Woodland League do not think so, hence are calling for suspension of certification until such time as the Social and Environmental issues have been addressed within a clear Forestry Plan for the future.

10.

In the Indicator/ Verifier Paper endorsed by Woodland League and enclosed for your observation, We would like to bring your attention to the fact , that the Heritage Council (in Ireland) called for a species ratio 50: 50 NATIVE BROADLEAF/NATIVE CONIFER to EXOTIC SOFTWOOD CONIFER. This information is available in the Heritage Councils 1996 Forestry policy document. The Woodland League are calling on all genuine stakeholders, and interested parties/individuals to endorse and support this 50 : 50 forestry policy. The state planting policy at present promises to plant at least 20 per cent native species. This is in line with , the E.U. FORESTRY COMMISSION

guidelines for grant aid which this state signed up to on behalf of the Irish people. The reality on the ground has seen less than 9% broadleaf planting across the country and of this figure only a small amount have been of native provenance. The Woodland league feel this is a flagrant breach of FSC PRINCIPLES in relation to forestry companies complying with the National and International Laws and Treaties embraced by the host Country.

11.

We ask the Soil Association to investigate how much land in Coillte's portfolio consists of trusts/conveyances in order for transparency in future forestry disputes. We know that Monivea Wood was left to the people of Monivea by Lady Kathleen Ffrench. This failed to deter Coillte from their outrageous attempt to sell this wood. At present there is no access for the public to details of other trusts/conveyances which Coillte inherited from the old land commission, whose lands were passed over to Coillte by the Irish government when they were created in 1989. This coincided with an E.U. directive demanding no member states shall hold substantial land banks. Please inform us as to present status of Monivea Wood dispute, and let us remind you of the importance of access to this information for the proper functioning of the social aspect of FSC and the creation of a level playing field to help resolve land and tenure issues when negotiating now and in the future in the true spirit of Agenda 21 from where FSC Principles originate.

12.

Dr Anne Behan, along with Jacinta French early on in this process, represented the views of the social and environment forestry coalition, in a fair and transparent way completely in line with FSC. Since then this progress was eroded and the coalition divided. The Woodland League endorse fully the views as represented by the united coalition.

We would like to commend the late Dr Anne Behan for her committed endeavours to help protect Irelands fragile environment and her valued involvement with this process.

Beaneacht Dé a chara.

We look forward to hearing from you in the near future.

Yours faithfully

Andrew St. Ledger
P.R.O.

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Mr Pierce Brosnan, *Irish Actor, endorsee of FSC Campaign 1999*
Mr Patrick Holden, *Executive Director Soil Association*
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