



QUALIFOR PROGRAMME

Associated Documents

Number	AD 65
Title	FM Main Assessment Report
Page	1 of 77
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Forest Management Certification

Public Summary Information

Project Number:	6880-IE
Client:	Coillte Teoranta The Irish Forestry Board
Country:	Republic of Ireland
Scope:	438,000 ha of plantation and semi-natural forest in the Republic of Ireland
Main species/products:	Sitka spruce, Scots pine, lodgepole pine, Douglas fir
Annual production:	2,150,000 m ³
Assessment date:	12 June 2000
Certificate Number:	SGS-FM/COC-0706
Date of Issue:	24 May 2001
Duration:	5 years
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SECTION I - PUBLIC SUMMARY REPORT

1. INTRODUCTION AND SCOPE

This report presents the results of an assessment of Coillte Teoranta's forest management operations in the Republic of Ireland, carried out by SGS QUALIFOR during the period 12 June 2000 to 25 August 2000.

The purpose was to assess the operations against the requirements of the QUALIFOR Programme, the SGS Group's forest certification programme accredited by Forest Stewardship Council.

The Assessment covered all forest management operations on the following forest areas:

Area	Total Area (ha)	Average Production (m³)
Eastern Region	45,000	318,000
Southern Region	92,221	596,000
Mid-Southern Region	100,442	583,000
Western Region	73,029	285,000
North-Western Region	78,200	451,000
Midlands Region	49,108	276,000
Total	438000	2,509,000

2. COMPANY BACKGROUND

Coillte Teoranta is the State-owned commercial forestry company, established in 1989 under the Forestry Act 1988, and now owns public forests in Ireland. Coillte is a private limited company with shares owned by the Minister for Finance and the Minister for the Marine and Natural Resources. Coillte inherited the majority of assets and staff from the former Forest Service when it began trading on 01 January 1989. The principle objectives under the 1988 Forestry Act are:

- Operate on a commercial basis and in accordance with efficient silvicultural practices
- Manage the resources available in a manner consistent with the company's objectives
- Establish woodland industries and participate with others to enhance the profitable operation of the company.

Coillte has a board of nine directors appointed by the Minister for the Marine and Natural Resources. The directors have no interests in the shares of Coillte or subsidiary companies. The company is managed by a senior management team, with a General Manager in overall control of Coillte Forest forest management operations and a General Manager

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responsible for Coillte Enterprises (nurseries, Christmas trees, leisure etc.), both reporting to the Chief Executive.

Coillte Forest is divided into six regions as set out above. Each region has a regional manager and staff responsible for all aspects of management of the forest resource. The responsibility for forest management is divided between six functional teams within each district. Each team has at least one team leader and supporting foresters, foremen, forest workers and administrative staff as required:

Team 1: Acquisitions and forest establishment

Team 2: Timber resource management

Team 3: Timber production and sales

Team 4: Forest management

Team 5: Engineering support

Team 6: Finance and administration

Coillte has a total staff of 763, which includes 438 forest workers and 279 foresters at a variety of grades. Coillte currently plants approximately 3000 ha of new forest each year, and fells and restocks around 8000 ha annually. Coillte estimates that approximately 7 million visits are made to its forests annually.

Coillte also has nursery stock and Christmas tree production together with income generating leisure facilities and a small sawmill operating under Coillte Enterprises. Coillte also owns a 1/3 share in the Louisiana-Pacific Coillte Ltd OSB plant.

3. FOREST MANAGEMENT SYSTEM

This section describes the broad characteristics of forest management in Ireland, within which Coillte operates. Brief comments are made on Coillte's management practices in this context.

3.1. Bio-physical setting

Ireland has a relatively poor native tree flora of some 43 tree, large shrub and climber species including only two conifer species, however the status as native species for some six of these species is the subject of debate for some locations within Ireland.

In addition a number of exotic species have been introduced during the preceding two millennia, with large numbers of exotic coniferous species introduced for commercial forestry purposes during the latter part of the eighteenth century and vigorously throughout the nineteenth century. The poverty of natural conifers (only two and both non-commercial) has meant that exotic species from Europe, North America and Japan predominate. These species have been growing for many years amounting to two and three rotation lengths, can regenerate and have not succumbed to disease.

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The range of native broadleaves is also somewhat limited, oak, ash, birch, willow, whitethorn, hazel, rowan and cherry. Introduced broadleaves such as beech and sycamore may now be considered semi-natural.

The forest area of Ireland now comprises 9% of the total land area, almost 200,000 hectares of which is privately owned, two thirds or 400,000 hectares is publicly owned. This is an increase in the percentage tree cover since the beginning of the twentieth century, when forest cover was approximately 1%. This increase has been achieved through the establishment of plantation forests with exotic coniferous species such as Sitka spruce (*Picea sitchensis*), lodgepole pine (*Pinus contorta*), Norway spruce (*Picea abies*), Larch (*Larix* spp.) and Scots pine (*Pinus sylvestica*). Other exotic species used on limited scale include Douglas fir (*Pseudotsuga menziesii*), true firs (*Abies* spp.), and Western Hemlock (*Tsuga heterophylla*), Western Red Cedar (*Thuja plicata*), Lawson Cypress (*C. lawsonia*).

Ireland has no remaining truly natural forests but semi-natural woodlands make up approximately 6% of the forest area. The Coillte forest estate covers a variety of woodland types including conifer plantations, semi-natural broadleaved woodlands, broadleaved plantations and mixed broadleaf and conifer plantations. However, for commercial timber production, the main economic resource of Coillte, is coniferous plantation forestry. The main species within these plantations is Sitka spruce and Lodgepole pine, Norway spruce, Scots Pine and Larches.

Ireland's forests have been steadily cleared and fragmented through clearance of land for agriculture and use of timber. By the 1600s it is estimated that only 12% of Ireland was covered in forest and was further exploited as the strategic importance of timber grew. However during the period 1698 to 1794, the passing of 17 parliamentary acts ensured the voluntary and compulsory conservation of existing woodlands and encouraged the new plantings by the large estates in the 1700s. New plantings of primarily exotic species continued on into the 1800's reaching its zenith in the year 1880, at which stage 6% of the total land area was under forest. Beginning with the 1881 Land Acts and continuing right up until the end of the First War many of the earlier plantings were felled for both political and financial reasons. At the turn of the century the scale of forest devastation was so severe that it led to the inception of state forestry programme in 1903. By 1905 the area under forest was just over 100,000 ha (1% of the land area) and this was further reduced during the First World War. By 1920 the area under forest cover was just under 50,000 hectares (0.5% of the land area).

A major national commitment to restore forest cover was made by the government resulting in the purchase & planting of poor agricultural land initially to promote rural employment. By 1945 annual plantings exceeded 3,200 hectares per annum. Later in 1948, the State firmly established a programme for forestry development setting 10,000 hectares as the annual afforestation target - targets to include the purchase and planting of land directly. Programme targets for afforestation reached 10,000 ha per annum in the 1960s, and continued until the mid to late 1980's at which stage the annual afforestation target was increased to 25,000 hectares per annum.

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In addition, large areas of native and semi-natural forests were transferred from the then Forest & Wildlife Service, to the Office of Public Works, now Duchas, to be managed for conservation objectives.

Coillte Teoranta. (The Irish Forestry Board), a semi-state company, was set up with a commercial mandate under the 1988 Forestry Act. Under this act, the ownership and management of most State forest plantations was vested in Coillte, and as such, is the single largest forest owner in the country. Other state forests/parks/reserves which remain under the management of Duchas are the native and semi-natural woodlands and are located primarily in Wicklow, Kerry, Clare and Donegal. Areas of semi-natural woodland are also located on private estates and farms.

Private woodlands consist of old estate woodlands of both semi-natural and plantation origin and newer plantations both broadleaved and coniferous. Within recent years approximately 11,000 owners, mostly farmers, have planted woodlands and forests. The average plantation size under private ownership is approximately 8 hectares, however, there are many extensive blocks of plantation woodland, in particular in Coillte's ownership, in excess of 5000 ha.

The current area under forests is over 600,000 ha of which two-thirds is in state ownership. Most of this forest had been established since 1950 with significant increases in the rate of planting in the private sector after 1989, when improved grant assistance became available. Through the 1990s afforestation rates have been consistently around 20,000 ha per annum, with in excess of 80% being planted by the private sector.

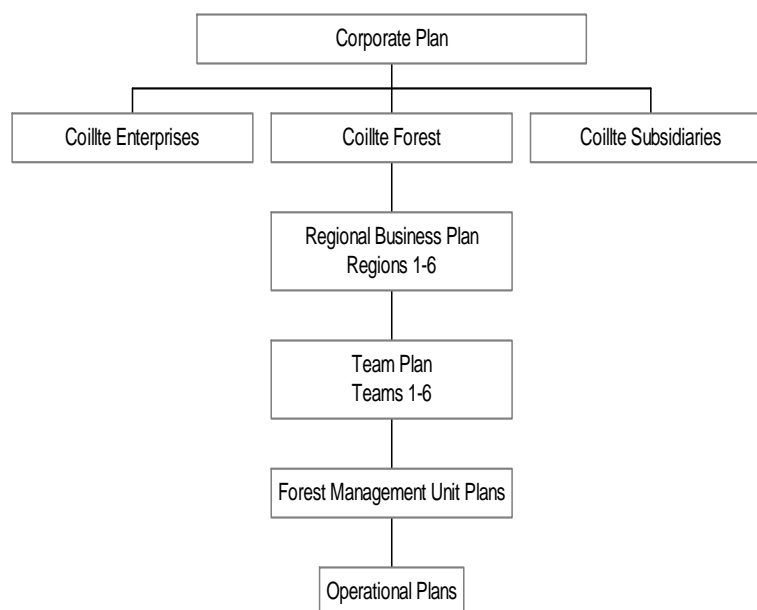
While Coillte have until recently had a policy of purchasing new land on the open market, the reduced area of land coming on the market when combined with the overall buoyancy of the Irish economy, has resulted in prices for typical forestry land going beyond the economic rate of return. Coillte continues to acquire new planting land through the Farm Partnership Scheme which is concentrated on better land types. Coillte now has 292 farm partners and 6144 ha planted under this scheme. Afforestation target is 3,000 hectares per annum in conjunction with this scheme.

3.2. Planning process

The Department of Marine & Natural Resources has overall responsibility for forestry development in Ireland, which is discharged by the Forest Service (the Irish forest authority) as a division of the Department. The Forest Service responsibilities include national forestry strategy, development of public and private forestry, forest protection, administration of forestry grant and premium schemes, control of tree felling, promotion of forestry awareness and the support of forest research.

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Planning within Coillte aims to ensure that its activities fulfil the requirements of the objectives as stated in section 2. In addition Coillte has committed to integrating the concept of sustainable development into all forest planning and operations through the development of a Sustainable Forest Management policy and the setting of targets for sustainable performance based on the Helsinki criteria for sustainable forest management. Each of the six regions builds these objectives into the management of its forest resource through the following management planning process.



Budgets are prepared from predicted revenues and expenditures of forest activities required to deliver management objectives. Each region produces a five-year business plan which is updated annually. Regional business plans are incorporated into Coillte Forests' five year rolling plan which is used to prepare Coillte's Corporate five year plan. The planning process is supported by a series of guidelines and new standard operating procedures (SOPs) which have been introduced through a programmed release since mid-1999. Performance is measured against the various plans through the use of the company's Management Information System (MIS) which is networked to all regional offices.

Production forecasting is based on Coillte's forest/compartments/sub-compartment database, which is maintained by the regions through a programme of audit & inventory which is then incorporated into the MIS and Geographic Information System (GIS). Yield models applied to the timber mensuration information databases provides predicted year of clearfelling and associated timber production. Production from thinning is also estimated through the Thinning and Rotation Classification System (TRC) which also utilises the inventory information held in the databases.

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Within the regions, the forest area is divided into a number of forest management units (FMUs), as shown below.

Region	FMU	Area (ha)
Eastern Region	East Wicklow	6952
	Wicklow Dublin Uplands	18999
	Wexford Lowlands	4452
	Border Hills	9752
	Blackstairs Mountains	4468
Southern Region	West Cork	11946
	Waterford Lowlands	8241
	Mullaghareirk	11731
	South/West Kerry	17093
	North/North East	20713
	Mid/East Cork	9717
	Waterford Uplands	13047
Mid-Southern Region	Galtee	13724
	Slieve Aughty	33150
	Suir/Nore/Barrow	9624
	West Clare	7950
	Slieve Felim/Devils Bit	14885
	Mid-Tipperary/Roscommon Plateau	11294
	Feale Catchment	9815
Western Region	East Galway	10694
	Roscommon	4759
	North Mayo	25794
	Connemara	16867
	South-West Mayo	6488
	East Mayo	8242
North-Western Region	East Donegal	10251
	West Donegal	22207
	Pettigo	9951
	Sligo	12832
	Lough Allen	15973
	Boyle	6742
Midlands	Northern Border	8176

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Region	FMU	Area (ha)
	Eastern Border	3019
	Lakelands	8145
	Midlands	11788
	Slieve Blooms	17980

At the site level operational plans are used to manage, administer, control and monitor all afforestation, restocking, and harvesting operations. Operational plans, which utilise the information held in the MIS database, define the details of the operation, illustrating coupe boundaries, extraction routes, special areas or features to be protected or avoided, monuments or conservation areas or habitat areas.

3.3. Harvest and regeneration

Clearfelling and restocking by planting are the predominant methods employed for plantation management by Coillte. Coupe sizes and shapes are expected to comply with the Forest Service - Forestry and the Landscape Guidelines and the National Code of Best Forest Practice.

While motor-manual harvesting systems are still in use in Ireland, the majority of Coillte's harvesting work is now mechanised, typically through a harvester/forwarder mechanised shortwood system. However where site conditions or product specifications dictate, tree length skidding and cable crane systems are also in operation but only as a minor component of the total harvesting programme.

Within commercial plantations the financial aim is to manage and harvest crops to maximise financial return. Coillte's MIS contains predicted felling year through maximisation of net discounted revenues and thinning schedules aimed at thinning to marginal thinning intensity for each compartment/sub-compartment. However attempts to increase age class diversity through premature and delayed felling, and the establishment of long term retentions will facilitate actual interventions away from the purely financial optimum schedule.

Coillte has a base policy of thinning all stands in which thinning operations will not result in an increased susceptibility to windthrow.

In practice Coillte aims to thin all stands to marginal thinning intensity in order to maximise site potential. However, risk of inducing windblow may result in alternative thinning regimes being adopted including the implementation of a single thinning, delayed subsequent thinning and finally, the option of no-thin. Across the Coillte estate approximately 25% is classified as no-thin. The timing of initial thinning is crucial particularly on exposed sites in the west of the country and must be carried out within a specified period or 'thinning window', delay beyond this period increases the potential for windblow. For this reason the practice of pre-commercial thinning is not uncommon.

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3.4. Silviculture

While many of the existing plantations were established through the use of deep forestry ploughing, mechanical ground preparation in restock sites is generally carried out through scarification or dry- or ditch-mounding, and in afforestation sites, through ripping, dry- or ditch-mounding

Afforestation and restocking is carried out through planting of nursery raised planting stock. Restocking through natural regeneration is utilised on a limited scale. Establishment programmes include weed control mainly through the use of herbicides but also through manual or mechanical means. On the better land types fertiliser may not be applied, however it may be applied aurally to areas of poor growth. On restock sites, it is predicted that within second and third rotations the use of fertiliser will be reduced following improvements to site conditions.

3.5. Monitoring processes

The principles of establishing, managing, harvesting and replacing forests on a sustainable basis to meet environmental, economic, social and cultural needs have specific applications in forest management.

The Forest Service of the Department of the Marine & Natural Resources is responsible for carrying out compliance audits of private and public forestry organisations. These audits may be carried out by Forest Service Inspectorate or persons or agencies nominated by them. The National Code of Best Forest Practice represents an assessment system which is now available to the Forest Authority in Ireland, the Forest Service, to ensure compliance. The purpose of the code is to contribute to maintaining operational standards and to avoid or mitigate adverse impacts on environment, economic and social values. The code of practice with its compliance and assessment procedures provides an incentive to the forestry sector to adhere to high standards in forestry operations whilst giving a clear indication to the public of the range and scale of these operations and the potential impacts.

While different companies, owners or organisations may provide their own internal codes of practice, set standards and implement self assessment, these should conform to the national code.

Coillte monitors all operational processes associated with establishing, managing, harvesting and replacing forests. Internal audits are carried out in respect of all new planting and restock sites. Labour and materials in respect of all operations is recorded on MIS for each compartment /sub-compartment. Inventory surveys are carried out and all changes are entered on MIS and GIS databases.

In the case of harvesting and removals all sales are monitored from the forest to the end user and signed off at the completion of the sale. As with establishment operations, all environmental and social impacts of the harvesting operations are checked and monitored on site.

The monitoring of overall management and performance levels over a range of objectives and projected outputs are annually reported in Coillte

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Corporate Plan. Targets and performance measures in the Corporate Plan for the period 2000 – 2005 are :

Financial

- Cash surplus
- Profit
- Land procurement & establishment
- Timber production & sales
- Roding
- Research and development
- Return on capital employed for ancillary trading businesses
- Income from disposals
- Training

Providing environmental, social and other outputs

- Development of a management system to deliver SFM across the estate
- Development of standard operation procedures (SOPs) for all of Coillte Forests main business processes
- Production of a series of Practice Group reports internally dealing with a range of issues including species diversification, landscape, use of chemicals, infrastructure, consultation, communications training, soils and water, recreation, non wood products and socio-economic impacts
- Realignment of the workplan and business planning guidelines for the year 2000 in the context of SFM
- Training of all staff on SFM and related issues

Providing an efficient service

- Market initiatives for the Sawmill Sector in 2000
- Team Based Process Management
- Performance Management System
- Additional “tools“ to be deployed to assist in ensuring that Resource data is consistent, reliable and timely
- Infrastructure/County Roads – seek EU funding measures
- Upgrading existing IT systems to a new central processing platform which will integrate the existing MIS and GIS.

A range of other monitoring activities occur on Coillte Teo lands, including both formal and informal monitoring of specific issues through outside bodies.

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4. SOCIO-ECONOMIC AND ENVIRONMENTAL CONTEXT

4.1. Social aspects

Consultation

Formal and informal consultation with both statutory and non-statutory bodies is carried out by the Forest Service for any proposals which involve felling, restocking or afforestation operations subject to a Felling Licence or Forest Design Plan. The Forest Service also provides public notification for all afforestation plans which have been submitted for approval. Coillte carries out direct consultation with Forest Service, Planning Authorities, Fisheries Boards, Duchas and other non-statutory agencies/groups at various stages in their planning process; the degree to which this happens and at what stage varies between regions, site type or location and scale of operation planned.

Employment

With the increasing mechanisation of forestry operations, fewer jobs exist in forestry than was the case 30 or 40 years ago. Forestry no longer provides substantial rural employment opportunities. Additionally, the increasing capitalisation of forestry means that there are fewer operators who work on large-scale contracts over a wider area than previously. A large proportion of forestry activity, particularly harvesting and extraction, is carried out by contractors. Coillte still maintains a small number of direct labour staff. As highlighted in successive Corporate Plans, Coillte is committed to compliance with all legal and best code of practice in regard to safety, health and welfare of its staff and others utilising or visiting its property. In addition to procedures and structures to meet the requirements of the 1989 Act, an ongoing review mechanism is in place to establish the effectiveness of these procedures and structures. Particular attention is paid to on-the-ground assessments and that they encompass all safety requirements. A revision of the company's safety statements was completed in 2000.

Access and recreation

Coillte permits free access to its estate to members of the public for pedestrian, informal recreation. However access may be limited due to health and safety reasons at operational sites. Additional access for specific purposes e.g, orienteering, pony trekking, motor-cycle events etc. can be achieved through a permit system.

A number of rights of way and walking routes also exist over Coillte's forests. In addition Coillte runs a number of sites with waymarked footpaths, cycle routes, car parks, picnic sites and other visitor facilities.

4.2. Environmental aspects

Ireland has approximately 600,000 hectares of forest of which 40,000 hectares are estimated to be on old woodland sites. Approximately all of this can be described as Semi Natural Woodland (SNW), some of which have been converted into plantation. Most of the old estate woodlands are of deciduous trees, in contrast to the state forests which are predominately coniferous. The term SNW covers all stands of natural origins which do not

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obviously originate from planting. This may include stands with naturalised alien species such as sycamore or beech. SNWs therefore represent some of the most important sites nationally for biodiversity. Areas of particular significance for biological or geological reasons are given statutory designations as National Heritage Areas (NHAs), Special Areas Of Conservation (SACs) and Special Protection Areas (SPAs) and have statutory protection. In Ireland, Duchas is the regulatory body with responsibility for the quality of forest management in privately and publicly owned forests located within designated NHAs, SPAs and SACs.

In response to the SFM Initiative, Coillte is developing a biodiversity action planning process which includes the identification of important areas and the preparation of biodiversity action plans (BAPs) and habitat actions plans (HAPs). These action plans are presently being produced in conjunction with forest landscape design plans and also include heritage, cultural and archaeological values in respect of each site plan.

More general advice on conservation is provided by the Duchas. The Heritage Council of Ireland has a statutory responsibility for Forestry & The National Heritage, where forest activities may impact on flora, fauna, wildlife habitats, geology and landscapes. Guidelines for the protection of soil and water resources during forest operations is available in a series of Forestry Service guidelines (particularly the Landscapes, Fisheries & Archaeological Guidelines).

4.3. Regulations

Forestry regulation in Ireland is implemented by the Forest Service. Forestry operations and environmental protection are regulated by a number of Acts of the Oireachtas and EU Directives. The main legislative instruments governing forestry in Ireland are:

- **Forestry Act, 1946** - governing the felling of trees
- **Forestry Act, 1956** - facilitating compulsory purchase of commonages
- **Forestry Act, 1988** – establishing Coillte Teoranta

The primary piece of legislation relating to forest management is the Forestry Act 1946. With certain exceptions, mainly relating to non-commercial situations, it is illegal to fell trees in Ireland without the prior approval of the Forestry Service. Permission is granted through a felling licence, normally conditional on regeneration or replanting, or through approval of a plan of operations for the site, such as management, restock and forest design plans.

Where felling licences or plans of operations affect areas designated for nature conservation or archaeological value, there is an obligation to consult the relevant statutory bodies prior to approval. For example operations within National Heritage Areas (NHAs), Special Protection Areas (SPAs) and Special Areas of Conservation (SACs) must be first agreed with Duchas.

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National Monuments Acts 1930 and 1989 protects monuments and artefacts. Likewise, operations affecting National Monuments must be agreed with Duchas. Other protected areas, such as National Scenic Areas, are the responsibility of the Local Planning Authority and the Forestry Service.

Environmental Protection Agency Act 1992 provides licencing regulations and control of activities for environmental protection; monitoring of quality environment; legislation defines the areas for which an environmental impact assessment (EIA) is necessary and is administered by the Forest Service.

Wildlife Act 1976 protects wild birds – but exempts agriculture, forests and fisheries activities from unintentional injury.

Local Government Acts 1963 –1990 deals with tree preservation. Local Authorities consulted in respect of felling applications.

Special Amenity Orders (SAAO) And Conservation Orders under the Local Government Act Amended in 1976 can designate amenity areas or grounds of outstanding beauty, recreational value or conservation. Local Authorities consulted in respect of establishment and felling applications.

Local Government (Water Pollution) Act 1997, 1990 deals with the prevention of water pollution. Fisheries Boards consulted where afforestation, restock and harvesting operations may provide a hazard to water quality.

Roads Act 1993 deals with dangerous roadside trees. Local Authorities consulted in respect of felling applications.

Road Traffic Acts 1963-97 deals with traffic, construction equipment and use of vehicles regulations. Local Planning Authorities deals with weights for loads, vehicular traffic restrictions on public roads.

Safety Health & Welfare At Work Act 1989 and Safety Health & Welfare At Work Regulations empowers the National Authority for Occupational Safety and Health (NSA) with responsibility for promotion of safety, administration and enforcement of statutory provisions. NSA guidelines relating to forestry, cover such issues as :-

- Care and protection of humans, animals and plants, safeguarding the environment and guarding against water pollution in the use of herbicides
- Risk assessment planning, safety statements and rules for hazardous work
- Rules on equipment, risk zones, ground conditions and emergencies
- Rules for harmful substances with to instruction , handling, application and storage.
- Advice for the use of clothing for and the maintenance of chainsaws
- Rules on tractors, mobile machines and STVS

The following regulatory framework has an indirect impact on forestry operations in Ireland:

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The E.U. Habitats Directive 1992 (92/43/EEC) provides for conservation sites e.g. NHAs – areas of special interest for flora, fauna, geology and topography; SACs – habitats of European interest which must be conserved and are protected from damage and developments threatening wildlife.

The EU Council Birds Directive (79/409/EEC) requires wild birds and associated habitats to be protected.

The EU Directive On The Marketing Of Forest Reproductive Material (66/404/EEC) regulates material for sale of scheduled species and specified approved basic material (from seed stands and seed orchards).

The EU Directive On External Quality Standards For Forests Reproductive Material (71/161/EEC) deals with external quality standards of plants derived from listed reproductive material.

EU Plant Health Directive (77/93/EEC) bans the introduction of organisms into/within member states; harmful organisms if present on plants and products; plants and plant products into member states and protected zones.

The EU Scheme On The Protection Of Forests Against Atmospheric Pollution Council Regulation 35/28/EEC sets up observation plots and trials to assess crown condition, defoliation, soil and other factors.

5. LOCAL STANDARDS

At the time of assessment there was no FSC-endorsed national standard. A draft national standard had been prepared by the Irish Forestry Certification Initiative – Forest Management Standards for the Republic of Ireland. The standard was in its second draft and was undergoing consultation at the time of the assessment. The assessment checklist was developed using the (2nd draft) Forest Management Standards for the Republic of Ireland supplemented with the FSC-endorsed Forest Management Standard for the United Kingdom and the QUALIFOR checklist. In all criteria the most stringent requirement from the three documents was adopted.

6. THE ASSESSMENT

6.1. Schedule

The Assessment was preceded by a pre-assessment by SGS QUALIFOR during 06 – 09 December 1999. This examined the management systems and identified any gaps that might preclude certification. Information gathered was used to plan the main assessment. Key stakeholders were identified. The main assessment was carried out during the period 12-28 June 2000, 22-25 August 2000. Follow-up visits were undertaken 27-29 March 2001 and 23-25 April 2001. A series of meetings were also convened between Coillte and SGS QUALIFOR in September, October and December 2000. A detailed schedule is shown in Appendix I of the full report.

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6.2. Team

- Lead Assessor and Team Leader: QUALIFOR Lead Assessor.
- Local Specialist: forest management specialist with 42 years experience in the Irish forest sector.
- Local Specialist: forest management and wildlife specialist with 28 years experience in the Irish forest sector.
- International Specialist: rural development specialist with 16 years international experience.
- International Specialist: forest management specialist with 23 years experience in the UK forest sector.
- International Specialist: rural development specialist with 22 years international experience.

Curricula vitae are provided in Appendix II of the full report.

6.3. Peer Reviewers

Three independent international specialists have been selected to review this report. They include one from academia, one experienced in social forestry and one from an environmental organisation.

6.4. Process

The Main Assessment was conducted in the steps outlined below.

Preparation

Using the results from the pre-assessment and the local standard, a checklist was prepared from the generic QUALIFOR checklist.

Stakeholder notification

A wide range of stakeholders were contacted to inform them of the planned assessment and ask for their views on relevant forest management issues. These included environmental interest groups, local government agencies and forestry authorities, forest user groups, and workers' unions (see Appendix V of full report). Three stakeholder meetings were held:

- Dublin, 23 June 2000
- Portlaoise, 27 July 2000
- Dublin, 11 August 2000.

Stakeholders who had raised issues with SGS QUALIFOR were contacted in March and April by letter, email or telephone.

Opening meeting

An opening meeting was held at Coillte's Head Office in Dublin on 12 June 2000. The scope of the assessment was explained and schedules were determined (see Appendix I of full report for attendance sheets).

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Document review

A review of the main forest management documentation was conducted to evaluate the adequacy of coverage of the QUALIFOR Programme requirements. This involved examination of policies, management plans, systems, procedures, instructions and controls.

Field assessments

Field assessments aimed to determine how closely activities in the field complied with documented management systems and QUALIFOR Programme requirements. Interviews with staff, operators and contractors were conducted to determine their familiarity with and their application of policies, procedures and practices that are relevant to their activities. A selected sample of sites were visited to evaluate whether practices met the required performance levels.

Stakeholder interviews

Meetings or telephone interviews were held with stakeholders as determined by the responses to notification letters. These aimed to clarify any issues raised and the company's responses to them.

Summing up and closing meeting

At the conclusion of the field assessment, findings were presented to company management at a closing meeting in Dublin on 25 August 2000. Any areas of non-conformance with the QUALIFOR Programme were raised as one of two types of Corrective Action Request (CAR):

- **Major CARs** - which must be addressed and re-assessed before certification can proceed
- **Minor CARs** - which do not preclude certification, but must be addressed within an agreed time frame, and will be checked at the first surveillance visit

6.5. Sampling

Significant variation was expected between regions, so intensive sampling was needed. Accordingly, all regions were visited. Regions were allocated to either a short (1 day) or long (3 day) visit. Half of the regions received a short visit; half received a long visit. Southern, Eastern and North-Western regions were visited for three days, and all other regions for one day. The selection of regions was carried out via random sampling. In addition Western and Midlands regions were re-visited for an extra two days each following the identification of key issues.

Within each region, the team spent time in the regional office reviewing documentation and interviewing staff. A sample of sites was visited in every region to evaluate whether practices met the required performance levels and complied with plans and policies examined in the office. During field visits, Coillte staff always accompanied the assessment team.

The initial site selection was made randomly, usually choosing from a list on-going or recently completed harvesting and restocking sites. Further sites were then allocated around these sites, ie. based on the initial random

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selection. Sampling was however, to an extent also dictated by logistics and the need to see a wide variety of operations in different stages of completion.

Field sites visited during the assessment were as follows:

Site Name	Description	Active	Completed	Ongoing
Toorgarriffe	21.3 ha clearfell. Harvester + forwarder	✓		
Killavullen	Thinning site – 1 st and subsequent thinning.	✓		
Streamhill, Ballyhoura	Restock site. Fertiliser application and pesticide treatment.		✓	
Kilfinnan	Mountain Park and local group development.			✓
Glenshelane	Long term retention, access, recreation			✓
New Villierstown	Landscaping			✓
Dromana	Landscapeing, planning for ATC			✓
Mountballey	Planning for ATC			✓
Mote Park	Consultation, management planning process, ATC, thinning, clearfell			✓
Carrigroe, Lough Dan	Landscape appraisal, restructuring planning			✓
Glendalloch	Planning for maintenance of natural regeneration, access, recreation			✓
Barnbawn Bog	Restocking, habitat creation		✓	
Ballydowling	Regeneration of broadleaved woodland. Thinning, ATC, restocking.	✓		
Ballygannan	Millennium Woodland site. Regeneration and restocking of broadleaves, thinning.	✓		
Shelton Abbey	Broadleaf woodland thinning, restocking. Manual cleaning	✓		
Ballykoog	Farm Partnership		✓	
Coolbalintaggart	Clearfell site. Harvester + forwarder operating	✓		
Ballanacloona	Restock site maintenance			✓
Curry	Premature clearfell. Harvester on site.	✓		
Castletown	Road construction	✓		
Monaghee	Planning for silviculture of beech woodland. Access, recreation			✓

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Site Name	Description	Active	Completed	Ongoing
Drumboe	Access, recreation, path maintenance			✓
Meenalig	Planning for road construction and thinning.			✓
Cronadun	Windblow harvesting. Forwarder on site	✓		
Kendrum	Landscape assessment for restructuring.			✓
Tivereigh	Restocking clearfell site.	✓		
Boulypatrick	Coillte P1999 afforestation site.		✓	
Cashel	Restocking, mounding, draining, aerial fertilisation proposals.		✓	
Colt	Restocking, mounding, draining, aerial fertilisation proposals		✓	
Poynstowns	Ground preparation		✓	
Mullinavat	Drainage, ploughing		✓	
Tory Hill	Drainage, ground preparation		✓	
Lickey	Aerial fertilisation		✓	
Knockalisheen	Restocking, drainage, mounding		✓	
Glengorra	Site of flash flood, clear-up			✓
Woodstock	Landscaping, restructuring, haulage, consultation		✓	
Newvillage	Hydrology, aerial fertilisation, restocking, monitoring			✓
Derradda	Aerial fertilisation, foliar analysis, monitoring, harvesting			✓
Lough Mucknow	Consultation, restocking, clearfell		✓	✓
Basllinasloe	Chemical application		✓	

7. ASSESSMENT RESULTS

Detailed assessment findings are included in the full report. For each QUALIFOR requirement, these show the related findings, and any observations or corrective actions raised. The main issues are discussed below.

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7.1. Findings related to the general QUALIFOR Programme

PRINCIPLE 1 Compliance with law and FSC Principles

- ***Respect for national and local laws and administrative requirements***

Coillte managers, staff and contractors demonstrated general awareness of Forest Service codes of practice, licences and guidance. Similarly Coillte managers, staff and contractors demonstrated awareness of pertinent non-forestry legislation and relevant guidance. Details of legislative and guidance requirements are included within various documents including Standard Operating Procedures (SOPs), plans, contracts etc.

- ***Payment of legally prescribed fees, royalties, taxes and other charges***

The company accounts are prepared on an annual basis and audited by a third party. No outstanding claims of non-payment of charges were established.

- ***Respect for provisions of international agreements***

No issues observed.

- ***Conflicts between laws and regulations, and the FSC P&C***

No issues observed.

- ***Protection of forests from illegal activities***

A number of unauthorised activities occur on Coillte's estate. The most common of these are fly-tipping, dumping of cars and very occasionally poaching. Team 4 has been charged with the monitoring and control of forest 'security'. Fly-tipping and litter are rapidly removed to discourage further dumping. In some regions where fly-tipping has been a particular problem managers have developed a cooperative approach with local authorities.

Gates or barriers have been erected on most entrances to forests, in particular once roads have been upgraded prior to harvesting operations, to reduce the incidence of unauthorised vehicular access, fly-tipping and timber theft. Efforts are made to ensure that barriers are kept locked during the duration of timber harvesting works. Security procedures relating to timber sales are included within the SOPs.

- ***Demonstration of a long-term commitment to the FSC P&C***

While there have been documented commitments made to managing the Coillte estate under the aegis of sustainable forest management, there has been no signed commitment by senior management assuring compliance with the FSC Principles & Criteria. **Minor CAR 01 was raised.**

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PRINCIPLE 2 Tenure and use rights and responsibilities

- ***Demonstration of land tenure and forest use rights***

All Coillte properties have deeds and associated maps in the company archive. Acquisition files on all lands acquired before 1989 are held in archives within Coillte's head office. Files on sites purchased since 1989 are retained within the Regional Offices. Within Coillte's structure the maintenance of this information is a designated task of Team 2.

- ***Local communities' legal or customary tenure or use rights***

All legal rights and interests are mapped and retained on acquisition folio maps, files and plans. Access rights and agreements, wayleaves, grazing rights and turbary rights, consents and ROWs are all listed and identified within the GIS. All legal documents are retained within archive and can be accessed in the event of dispute.

- ***Disputes over tenure claims and use rights***

There have been a number of minor tenure and use right cases in the past. Where possible cases have been settled between the parties, otherwise disputes have been settled through the legal system.

PRINCIPLE 3 Indigenous peoples' rights

No indigenous people, as defined within the FSC P&C were identified as living in or adjacent to the forest.

- ***Indigenous peoples' control of forest management***

Not applicable.

- ***Maintenance of indigenous peoples' resources or tenure rights***

Not applicable.

- ***Protection of sites of special cultural, ecological, economic or religious significance to indigenous peoples***

Not applicable.

- ***Compensation of indigenous peoples for the application of their traditional knowledge***

Not applicable.

PRINCIPLE 4 Community relations and workers rights

- ***Employment, training, and other services for local communities***

Coillte provides a wide range of inputs into the economy. However as a state owned company with a commercial mandate Coillte must remain financially viable and operate profitably. Coillte does not therefore operate as a community development organisation.

Coillte employs approximately 750 staff throughout Ireland in the regions. Of this total almost 60% are field staff who live in rural areas. It is estimated that an additional 650 FTE jobs are maintained through Coillte's contractor base. Contractor details were inspected by the assessment

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team which identified that while many contractors may carry out work for more than one region the location of working sites is generally in one local area. Where specialised skills or equipment are required contractors may be sourced from a much wider area.

- ***Compliance with health and safety regulations***

At all sites visited contractors interviewed had HIRA and safety statements available. At active harvesting sites no instances of unsafe working practices were noted by the assessment team. All operators in the field demonstrated a responsible attitude to health and safety and were well trained with adequate experience. Coillte has a Central Safety Committee which meets on a quarterly basis, chaired by the Company Secretary. This committee consists of the 6 Regional Managers, the Coillte Forest General Manager, the Manager Organisation, Development, Procurement and Safety. There are also three Safety Managers.

All contractors interviewed during field visits were able to provide proof of having received adequate training in the form of personal training/ID cards. Additionally Coillte manages and runs training courses funded by the Forest Service at its training school at Mount Rath. Coillte's training branch hold records of all direct personnel and contractors who have attended training courses administered by Mount Rath. Prior to allowing contractors to commence operations Coillte managers must ensure that contractors hold adequate training certificates.

- ***Workers' rights to organise and negotiate with employers***

Many Coillte staff are union members. The unions have been involved within planning for the recent move to functional team working. During the assessment there was no evidence that contractors were deterred from joining associations such as IFCA.

- ***Social impact evaluations and consultation***

There was significant evidence to suggest that consultation had been inadequate on a number of sites. There was a lack of effective stakeholder analysis on a number of sites. Consultation tended to react to problems / issues of concern raised by the public and despite the high profile nature and significant public use on a number of sites there was a distinct lack of pre-activity public involvement. There was an over-reliance on partners to ensure effective community involvement and an insufficient attempt to confirm what was being said. **Major CAR 02 was raised.**

- ***Resolution of grievances and settlement of compensation claims***

The involvement of all communities (local and wider) was significantly lacking; treated as a problem rather than an opportunity; reactive rather than proactive and occasionally confrontational; inappropriate in scale, method and type; lacking in formal systems and guidance at all levels.

Some efforts have been made to reverse some of these trends in recent months but they remain primarily reactive and lack a clear cohesive structured and strategic approach. There is also a need for a significant amount of staff training at all levels to develop good practice and enable

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staff to perform their duties. This whole area of the foresters work needs to be much more integrated into the process of forest management and treated as integral rather than additional to the process. **Major CAR 02 was raised.**

PRINCIPLE 5 Benefits from the forest

- ***Economic viability taking full environmental, social, and operational costs into account***

There was a lack of any effective socio-economic analysis on a number of significant management decisions. There was an over reliance on information produced by project partners (ref. Monivea) without ensuring the evidence was robust. Situations of major management decisions being discussed / taken with a significant lack of appropriate socio-economic analysis were seen at Monivae, Mote Park and Lough Muckno. Local community concerns did not appear to have been appropriately addressed in relation to site development at Mote Park and Lough Muckno. **Major CAR 002 was raised.**

- ***Optimal use and local processing of forest products***

Since 1998 Coillte has used a system of electronic auctions for timber sales. While a number of large scale timber processors have long term supply contracts all others bid through the fortnightly electronic auction. Access is available to all those who wish to bid for timber and can be accessed at any of Coillte's regional offices or can be set up within a purchaser's own premises via the internet. The whole system is audited by KPMG. Sales are held on a two-weekly basis with alternating harvested sales and standing sales. Each lot is allocated a reserve price calculated using international timber price. All potential purchasers are provided with details of the lots available in advance of the auction date – 3 weeks for harvested sales and 5 weeks for standing sales to allow for field inspection by prospective buyers.

Contractor records were examined by the assessment team and although the vast majority of contractors are located within the region in which they were working there are cases where contractors are sourced from further afield when specialist equipment is required. Contracts for harvesting and establishment works are allocated through a system of competitive tendering. However the location of contractors is not a consideration in the tendering process. The forest industry is encountering difficulties in sourcing contractors due to the current skills drain rural to urban areas (in particular by the construction sector) Coillte has therefore began movement towards medium or long term contracts for contractors to provide the security necessary to invest in equipment. However it should be noted that if these contracts are awarded on purely financial terms such contracts may not favour smaller scale contractors.

- ***Waste minimisation and avoidance of damage to forest resources***

In general harvesting is carried out in an efficient manner without undue waste or damage to residual crop in evidence during field visits. Sales contracts stipulate a time period for timber felling and removal and

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approximate volumes together with the manner in which timber should be harvested in order to avoid damage to timber and site. Contracts also include penalty clauses for failure to adhere to these contract conditions.

The burning of lop and top is not commonly carried out by Coillte and is implemented as a last resort and in particular on sites where there is a high risk of fire due to arson. Controlled burning is then carried out following windrowing. Burning may also be carried out for conservation reasons – at Glenealy, rehabilitation of broadleaved woodland after removal of conifer plantation with high levels of brash. Where burning had been carried out site plans included details of features such as fire risks, potential for smoke effecting the public etc.

Extraction using skyline is uncommon with Coillte and in general this is limited to extraction of poles. WTH is very rare and none were encountered during the field visits. Where WTH is planned this is accompanied with a 'research site assessment'.

- ***Forest management and the local economy***

During the assessment the assessment team witnessed the on-line auction on 15 June 2000, and inspected details of previous auctions. Harvested sale lots as small as 30 m³, 60 m³ and 90 m³ and standing sales as small as 400 m³ were noted. In addition to timber sales through auction regional offices are able to affect sales of timber to small scale or specialist markets in accordance with SOP 2.6 Timber Production:Commodity Sales. Local sales records for the period 01 – 06/00 were reviewed by the assessment team and found to total over 10,000 m³ and include sale of lots as small as 1 m³ with an average sale size of 106 m³. Coillte staff did comment that due to the strengthening of health and safety requirements a small number of clients who had previously bought standing timber did not meet the minimum requirements for safety and insurance and were now limited to purchasing timber 'at roadside'.

- ***Maintenance of the value of forest services and resources***

There were a number of examples of poor community involvement and poor socio-economic assessment in relation to both local and wider community needs especially Lough Muckno, Monivea and Mote Park. At Monivea there had been little consideration given to the needs of the wider community for recreation on the site and the local community representation had been poor. At both Mote Park and Monivea community involvement had been extremely limited and was brought about through public concern rather than any pro-active activity on behalf of Coillte. The wider recreational needs and social impacts had been largely ignored (meetings with community reps. and site visits). Significant evidence of poor landscape and recreation practice were witnessed at both Mote Park and Muckno. **Major CAR 02 was raised.**

- ***Harvest levels***

Management planning documentation and Coillte's management information system contain details of: predicted felling age, date of first thinning and proposed thinning regime, details of restocking proposals and species composition. The MIS contains predicted final felling date for all

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compartments immediately on restocking. This date is refined at P+14 when mensuration data is collected.

Management planning documentation details annual areas and volumes identified for harvesting for thinning and clearfell operations. This information is held on the GIS/VAX system and can present data on a sub-compartment, compartment, forest or regional basis. To allow this to be carried out new plantations are mapped at Year 4 and included on the GIS. Free growing crops are inventoried every 8 years including standard mensuration data to allow YC and volume predictions to be made. From this inventory a thinning rotation classification (TRC) is established through a series of models which establishes a thinning regime and date of final clearfell. The TRC can be altered from the standard models to suit local crop and site conditions such as risk of windblow therefore classifications can include prescriptions for no-thin or for one-thinning only for example. Approximately 20-25% of Coillte's estate falls into the no-thin category, with all other areas under a thinning regime.

Coillte has carried out a survey of its forest which has categorised all areas in terms of site potential and crop quality. This information is taken into account when restructuring is planned. The risk of windblow is well known and all FMUs have a thinning plan which details whether or not individual stands can be thinned and under which regime. Assessment of impacts on landscape and wildlife are being carried out but on a piecemeal rather than through a systematic manner. **Minor CAR 04 was raised.**

PRINCIPLE 6 Environmental impact

- ***Environmental impacts assessment***

While corporate, regional and FMU plans are subject to internal scrutiny and discussion with consultees such as FS, Duchas, etc. on FMU and operational plans help to screen for potential impacts there is no formal mechanism through which the potential impacts of all forest operations are screened. Site files contained evidence of consultation with bodies such as Duchas etc.

While the new SOP includes requirements for appraisal of impacts these were not being fully implemented at the time of main assessment. This combined with manager's desire to achieve the maximum possible area under conifer plantation has resulted in unnecessary impacts. At Cashel Forest main drains and mounding drains have been cut directly into head waters of Cush River which is already identified as a sensitive catchment. At Colt Forest major drains have not been marked on maps prepared for aerial fertilisation programme. At Callan Forest (Poynstowns) ploughlines cut more than 300 m without seepage zones which then run directly into main drain. At Mullinavat drains cut at angle > 3⁰ which then discharge directly into water course. Yellow Bog Cmpt 521635 no softening of straight edge to plantation or species link to adjacent broadleaves. Ballykoog planting design does not attempt to mitigate landscape impact from straight edges and planting right up to perimeter of land ownership.

There was a general paucity of environmental information. Due to the lack of information sites were being surveyed based on immediate needs, such

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as a particular known species (e.g. red squirrel at Mote Park) rather than to attain an effective overview on which to base future management. **Minor CAR 04 was raised.**

- ***Protection of rare, threatened and endangered species***

Coillte's GIS mapping makes provision for natural reserves (NHA, SAC, SPA), semi-natural woodlands, rivers, turbary, rides and open ground. With known special areas and features – such as NHAs – these areas are tagged within the GIS and excluded from conventional operations. Any maps drawn from the GIS include boundaries of NHAs etc and therefore are transferred to site or operational maps. There was good understanding among managers and staff of the implications of designations of these types (statutory or already mapped) on forest management. However biodiversity features and elements such as breeding sites, feeding areas and habitats especially those of a small/medium scale were not all marked on appropriate maps. In some cases managers were aware of these features as being present but sites not marked on maps. **Major CAR 05 was raised.**

Current deer populations are generally low throughout Ireland with the exception of the south east. Within the south east region in areas of greatest pressure good deer management plans exist which include the estimation of deer population, the setting of cull targets and the monitoring of actual cull levels and incidence of deer damage. However many FMUs do not contain provision for deer management or for monitoring of levels of deer damage despite acknowledgement of managers that deer numbers were increasing across the forest estate due to the increasing restock programme and the improvement of habitat for deer. **Minor CAR 06 was raised.**

Coillte is part of the Wicklow Deer Management Group. The majority of shooting is carried out through let shooting rights, however Coillte reserves the right to supplement shooting if necessary to ensure forest management objectives are not jeopardised.

No intensive game management was encountered by the assessment team.

Predator control is only carried out on an as necessary basis, usually at the request of a neighbour to control a specific problem such as foxes. In areas of high pressure such as the south east Coillte has played an active role in the setting up of Deer Management Groups. Interest by neighbours in active deer management has proven to be limited. However files contained evidence of Coillte's managers contacting neighbouring woodland owners on issues of deer control. Rabbit management is carried out on an as needed basis in response to specific problems. Where necessary this is carried out in liaison with neighbouring landowners. Files contained records of Coillte reacting to neighbour complaints of damage to crops by carrying out rabbit control.

Shooting leases can include the right to rough shoot any species which is not specifically protected by legislation. While the management of cull numbers for target species has been carried out through an evaluation of

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existing population levels and the setting of maximum allowable cull levels for some leases within east region this has not been implemented throughout Coillte. Estimates of existing population levels and justification of target cull numbers were not available for all leases. Records of actual cull returns were not routinely collected by Coillte from lease holders.

Minor CAR 07 was raised.

- ***Maintenance of ecological functions and values***

There was no evidence of areas being clearfelled and not restocked, other than for ecological/social enhancement. The assessment team found that Coillte staff were generally aware of the principles of sustainable forest management. The majority of woodland is of plantation origin and semi-natural woodland has generally had limited intervention management by default. Areas (particularly in the west of Ireland) have suffered from instances of run-off of fertiliser and sediment following afforestation and restocking works. The frequency of these instances has decreased and practice has improved following liaison with statutory and research bodies.

- ***Protection of representative samples of existing ecosystems***

Not all FMUs were supported by management planning documentation which identified a minimum of 15% of the area to be managed with conservation as a primary objective. Existing FMU plans contained details of how areas would be identified and how these would be prioritised. However at the time of assessment the exact location of areas to be managed with conservation as the primary objective had not been established within the FMU plans, maps of Coillte's GIS. Further, details of specific management prescriptions of how these areas should be treated in order to achieve the objectives of management for conservation are not available within FMU management planning documentation..

Areas of long term retention, natural reserves and restoration have not always been identified within FMU management planning documentation and prescriptions form management are not present for all FMUs. While managers in some FMUs may have identified potential NRs and LTRs (eg Northern Border) this has not been completed in all FMUs. **Major CAR 05 was raised.**

Coillte must ensure that managers are able to distinguish between NR and LTR. There was evidence of confusion about the objectives of these areas and applicable management regimes. There were instances of managers assuming that NRs should only be those areas already holding official designated status from Dúchas such as NHAs. Coillte must ensure adequate guidance is provided for managers to allocate areas which will provide greatest benefit at landscape level.

Deadwood strategies have been included in some FMU plans however not all FMU plans contain this information.. Where deadwood strategies exist these set general objectives at national or regional level but do not identify exactly how deadwood habitats would be provided, where deadwood is appropriate and how habitats will be created, maintained or enhanced. While deadwood habitats exist within forests this is not provided under any planned process and is therefore at risk from implementation of harvesting

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operations. Also the distribution of deadwood within Coillte's estate is not controlled through any planned process. While deadwood habitats are present in larger forest blocks in the form of semi-natural areas and windblown pockets in smaller fragmented blocks clearfelling may remove almost all standing trees. Further in many high yielding stable conifer plantations Coillte is able to thin to near model thinning regimes. The content of deadwood within these stands can be very low. **Major CAR 09 was raised.**

- ***Protection against damage to soils, residual forest and water resources during operations***

Given the wide range of objectives of management as well as geographical, ecological, landscape and social differences the range of silvicultural systems used within Coillte is limited. While there is some use of natural regeneration, group felling etc. this is very limited in extent and generally restricted to sites where clearfell and restocking is excluded for landscape or recreational reasons (eg Glendalloch). There is little application of alternative silvicultural systems or evidence that alternatives have been considered. Examples were seen of restock sites where there was considerable vigorous natural regeneration of broadleaves being removed to be replaced with conifer transplants. It was not apparent at all sites that adequate consideration of alternatives had been carried out except for the topic of economic return. **Major CAR 10 was raised.**

The felling and management systems chosen did not always take full account of local people. Stakeholder interviews and management planning documentation suggested a lack of consultation with local people over felling coupe design and routes for extraction (Muckno and Mote Park).

There are very limited areas of semi-natural woodland within Ireland. In general Coillte has adopted a minimum intervention approach to these areas. None are being managed with timber production as a primary objective. Where semi-natural sites are being managed (eg Ballydowling, Glenshellane, Drumboe, Shelton Abbey) this is being carried out through lower impact systems such as small group and coupe felling.

All regions contained areas which were being managed under lower impact silvicultural systems. However these areas were very limited in extent and almost exclusively restricted to non-commercial areas where high recreation access of landscape forced the use of alternatives to clearfell (ATC). Many of the areas of ATC are broadleaves. Within Ireland there has been limited application of ATC and therefore experience of these systems is also limited. While FMU plans identify the need for research into the application of ATC, plans did not detail areas where ATC would be applied or considered or detail the treatments which would be necessary.

Without a process for identifying potential areas for ATC and support for managers in management techniques it is not clear from current policy and practice that in the long term Coillte will increasingly favour lower impact silvicultural systems across its estate on windfirm conifer plantations. There is also no evidence that information is being collected by Coillte and analysed to allow the evaluation of ATC on a commercial basis on appropriate sites.

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The Code of Best Forest Practice limits the maximum clearfell size to 25 ha. Examination of the programme of clearfelling over the period 1999 – 2000 indicated that Coillte managers were limiting the size of individual clearfell sites to less than 25 ha in the majority of cases. Where coupes larger than 25 ha had been planned these could be justified due reasons of felling to windfirm edges or landscaping. However not all cases of felling coupes larger than 25 ha were accompanied by adequate forest design planning documentation. Examination of programmed felling coupes in the field however identified that although individual coupe sizes had been limited to below 25 ha in a number of cases (eg Coolbalintaggart) adjacent coupes (also < 25 ha) had been clearfelled in successive years. Hence areas in excess of 100 ha were clearfelled in a 5-year period. This does not comply with the Code of Best Forest Practice which suggests felled areas should be allowed to adequately ‘green-up’ before adjacent coupes are felled. **Minor CAR 11 was raised.**

Road making and maintenance is managed by the Engineering and Technical Services Team. The E&TS Team is responsible for:

- Agreeing road and access routes for harvesting and management operations
- Costing and phasing roads construction and maintenance works
- Supervision of road construction and maintenance
- Planning designated access routes with local authorities.

Coillte has some 7600 km of forest roads throughout the forest estate this provides an average road density of 20m/ha. Main operations are focused on creating new routes into areas moving into the production phase. This constitutes approximately 100 km of new roads constructed annually. Road maintenance is targeted to provide pre-operational improvements and post-operational repairs. During the assessment no incidences of inadequate road construction or maintenance were identified.

Specifications for the design and construction of forest roads are contained within Coillte’s internal guidelines and codes of practice for the planning and construction of roads. This includes guidance on the choice of road density. Details of road density calculations were investigated in the Midlands region and were found to take account of the requirements of Coillte’s internal guidance and the standard.

Internally the E&TS Team provide a road building and maintenance programme which fits into the regional business plan. This provides details of required works in the current year with outline details of requirements in subsequent years. A brief impact appraisal may be carried out prior to road works although documented evidence of this was not always available for all operations. There was evidence in site files that liaison was undertaken with Team 4 on the identification of potential environmental impacts.

• ***Chemical pest management***

Coillte has a chemicals use policy which specifies the minimisation of chemical use as an objective. The means through which this policy is to be achieved is via Regional application in the FMU planning documentation.

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Chemical strategies were not complete for all FMUs and did not adequately identify specific means of reducing chemical use. Details of chemical reduction targets which had been set and exactly how these objectives could be achieved were not clear. Within some reduction strategies the information provided on chemical use was inadequately detailed. Within some FMU plans details of actual chemical use did not specify exact application rates but volumes of chemicals used and total area of forest within the establishment phase which could be treated. **Major CAR 12 was raised.**

- ***Use and disposal of chemicals, containers, liquid and solid non-organic wastes***

Chemical storage was inspected and found to comply with the requirements for construction, signage, storage of materials and recording of use. Although no chemical use was ongoing at the time of the main assessment examples of contingency plans held by Coillte staff and contractors were seen. The transport of chemicals was not seen during the assessment however the transport of chemicals and the requirement for the use of locked transport boxes and the provision of adequate spillage equipment is detailed in the SOP and contracts.

Chemical storage, record keeping and disposal of surplus chemicals and used containers was examined. The disposal of surplus chemicals and containers is detailed within SOP 3.2 Establishment:Cleaning. At Mullingar the chemical store was found to be in order with requisite storage facilities for used chemical containers prior to removal by a licensed waste disposal contractor. Waste exchange certificates for the disposal of used containers and surplus chemicals were also seen by the assessment team. However while current practice is governed by Coillte's SOPs there have been instances of improper disposal of chemical containers. At one site the following had been improperly stored:

- .. 1 x *Silvapron D*
- .. 3 x *Gammacol*
- .. 3 x *Fostermark Dye*
- .. 1 x *Polytetrafluroethylene*
- .. 1 x *gerry can (petrol)*
- .. 3 x *500ml unknown*

Minor CAR 13 was raised.

All active and recently completed harvesting sites were found to be well maintained with no instances of improper disposal of waste materials. Disposal of planting bags was investigated at afforestation and restocking sites. On larger sites skips had been temporarily installed for the collection of used planting bags. While on smaller sites the assessment team found no instances of discarded bags through the sites bundles of bags were in evidence along roadsides. Staff intimated that these had been collected ready for disposal once the site had been completed.

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During the assessment only limited numbers of tree shelters were in use on the sites visited by the assessment team. Where shelters were in place there were no incidences of improper disposal and shelters were found to be of a biodegradable material.

The oils and lubricants currently used in forest equipment in Ireland is predominantly of mineral origin. At active harvesting sites interviews with contractors ascertained that none were currently using biodegradable lubricants. However in some cases contractors stated that their equipment was easily convertible although they had not been asked by Coillte to use biodegradable lubricants.

While Coillte has an existing policy on the introduction and use of biodegradable lubricants which recognises the desirability of biolubricants, Coillte has not pro-actively encouraged or required that these are used where possible. **Minor CAR 14 was raised.**

- ***Use of biological control agents and genetically modified organisms***

No GMOs are in use. BCAs have been used in limited circumstances for control of butt-rot in conifer plantations.

- ***The use of exotic species***

There have been no recent introductions of non-tree exotic species. Previous examples include rhododendron and species for game cover which were introduced in some areas prior to being acquired by Coillte. These areas are known and the control of these species is a management objective.

- ***Forest conversion to plantations or non-forest land uses***

Coillte disposes of a limited area of land annually. In 1999 this amounted to approximately 450 ha, or 0.11% of the total forest area and is off-set by an annual acquisition of 1400 ha.

PRINCIPLE 7 Management plan

- ***Management plan requirements***

The Coillte estate has been divided into 6 regions which are sub-divided into 37 FMUs. At the time of assessment while a number of FMU plans were in a late draft stage the majority of FMUs were not covered by adequate management planning documentation. **Major CAR 15 was raised.**

While a number of management plans had been prepared for FMUs these did not always fully meet the requirements of the certification standard. FMU plans were prepared according to a template which had been prepared and provided to the Regions. However while in some cases considerable detail of Coillte's corporate policies and regional interpretation of these had been included, the FMU plans failed to identify the unique characteristics of the FMU and discuss how these had influenced the setting of specific management objectives for the FMU and the prescription

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of those specific management operations and techniques to achieve these objectives.

Through Coillte's MIS outline plans for felling and thinning in the future were available however it should be remembered that these did not incorporate necessary adjustments for the required restructuring which would be a major management priority in a number of Coillte FMUs. **Major CAR 03 was raised.**

- ***Management plan revision***

The existing management prescriptions held on Coillte's MIS showed close correlation with operations completed. However this should be seen in light of CAR 015 regarding management planning documentation for FMUs. Where deviations had occurred local staff were able to provide reasons for example changes in felling coupes due to windblow, species selection due to improved understanding of ground conditions following felling.

- ***Training and supervision of forest workers***

All contractors interviewed during field visits were able to provide proof of having received adequate training in the form of personal training/ID cards. Additionally Coillte manages and runs training courses funded by the Forest Service at its training school at Mount Rath. Coillte's training branch hold records of all direct personnel and contractors who have attended training courses administered by Mount Rath. Prior to allowing contractors to commence operations Coillte managers must ensure that contractors hold adequate training certificates.

- ***Public availability of the management plan elements***

Coillte maximises use of its GIS/MIS for management planning purposes. While FMU plans have been prepared these were not available for all FMUs and these had not been adequately made available for public consultation. **CARs 02 and 15 were raised.**

PRINCIPLE 8 Monitoring and assessment

- ***Frequency, intensity and consistency of monitoring***

While a wide range of monitoring activities are carried out throughout the regions, this is generally restricted to forest management and silvicultural activities. Managers were able to provide good information on areas harvested, thinned, fertilised, restocked, growth rates and yield class through Coillte's MIS. Monitoring of social and environmental parameters are less well established, are insufficient to demonstrate compliance with the standard and do not always adequately address the particular issues of the FMU. There appeared to be a general lack of appropriate socio-economic baseline data. In addition no clear monitoring and evaluation systems were in place for social or community impacts of works. **Major CAR 16 was raised.**

- ***Research and data collection for monitoring***

The R&D Division, University Departments at Dublin, Cork and Galway together with independent consultants have been used to provide specialist

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advice on issues such as plant health, water quality and landscape impacts.

- ***Chain of custody***

All timber removed from Coillte's forests is covered by a contract document and/or weigh-tickets for individual loads of timber removed from the forest. These identify quantity, customer, date of removal, forest of origin (and in most cases the particular forest block). Standing sale contract documents contain details of the purchaser while weigh tickets contain details of haulier and consignee.

- ***Incorporation of monitoring results into the management plan***

Generally predictions and targets are reconciled against actual outcomes on an annual basis as part of the preparation for budget preparation as the rolling budget is refined for the coming year.

- ***Publicly available summary of monitoring***

Coillte prepares an annual report and abbreviated accounts which is published as the Annual Report. This has provided basic information on, total forest area, timber volumes harvested, afforestation figures, species composition. This is however at a corporate level broken down by region. However examples were seen by the assessment team of site specific information being provided on request to third parties.

PRINCIPLE 9 High Conservation Value Forests

While a number of SNWs are covered by specific management planning documentation, many SNW sites are not covered by management plans which refer to the Code of Best Forest Practice and relevant guidelines. In many cases SNWs are managed by default through non-intervention without adequate consideration as to whether or not this is the most appropriate management regime. While many of these semi-natural woodlands have individual management planning documents not all semi-natural woodlands are covered by specific management prescriptions.

Minor CAR 17 was raised.

While the Coillte GIS contained base information on the location of underplanted SNW this had not been fully utilised in the preparation of plans for the treatment of these areas. While a number of staff were aware of the presence of these woodlands within their charge this was not always the case. In addition there was no policy in place which provided guidance for staff on how these areas should be viewed and treated in the future. Where these woodlands had been identified and operations had been planned to maintain or enhance their value this had been carried out in an *ad hoc* manner. While a number of plantations on former semi-natural woodland sites are managed in a manner which retains and enhances their semi-natural characteristics, this is being carried out only on a limited number of sites and there has been no systematic implementation of this requirement across all regions. **Major CAR 18 was raised.**

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PRINCIPLE 10 Plantation

- ***Statement of objectives in the management plan***

See Principle 7.

- ***Plantation design and layout***

The area of new planting carried out annually by Coillte has fallen dramatically in recent years as the price of land makes the financial return from forestry unfavourable. However approximately 2700 ha of afforestation is carried out annually of which 70% is carried out by Coillte alone and 30% is carried out by Coillte through its Farm Partnership scheme. New plantations carried out by Coillte are largely adjacent to existing woodlands which have been in Coillte's ownership but not afforested until now, or small areas purchased adjacent to Coillte properties. Coillte currently has a policy of avoiding afforestation on peat bogs. New planting schemes are relatively small and are mainly located adjacent to existing larger forests. Harvesting of these areas would therefore be enlisted into that of the larger area.

- ***Diversity in composition***

There are few Coillte properties for which adequate restructuring plans have been prepared. **Major CAR 03 was raised.** Few Coillte forests share boundaries with forests within the ownership of other parties due to the dominance of Coillte within Ireland in terms of forest ownership. However where Coillte's forests did adjoin others forests (such as in Wicklow) evidence of liaison was seen by the assessment team. **Major CAR 03 was raised.**

- ***Species selection***

A number of FMUs do not meet the requirements for species composition as detailed in the standard. In particular the minimum of 10% broadleaves is not achieved in many FMUs. Examples include FMU plans in Eastern, Southern, Mid-Southern, Western, North-Western and Midlands regions. In addition the FMU planning documentation did not detail how this non-compliance was to be addressed or provide an estimation of when this requirement would be complied with. The Farm Partnership Scheme has a maximum broadleaf content of 10% as detailed within FPS documentation and corroborated by Coillte staff. This effectively restricts the selection of species within these areas and therefore species are not chosen to suit both site capabilities and management objectives. In particular FPS sites are characterised by better quality soils which could support a wide range of species, in particular broadleaves. The selection of species the process is skewed towards consideration of management objectives through the issuance of pre-set targets or limits rather than through an open appraisal which takes due consideration of the capability of the site. **Major CAR 19 was raised.**

- ***Restoration of natural forest***

Where valuable habitats have been colonised or planted but still retain valuable ecological characteristics these should be restored or treated in a

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manner that does not lead to further loss of value. While some areas have been identified this has not always been carried out in a systematic manner and proposals for subsequent treatment of such areas are not always available within FMU plans or additional documents. **Minor CAR 08 was raised.**

- ***Impacts on soil and water***

See Principle 6 and Minor CAR 04

- ***Pests and diseases***

See Principle 8

- ***Monitoring of impacts, species testing and tenure rights***

See Principle 8 and Major CAR 16

- ***Plantations established in areas converted from natural forests after November 1994***

No issues observed.

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7.2. Issues raised by Stakeholders

The following points have contributed to the team's observations and resulting actions taken by the company should be followed up at the next and subsequent surveillance visits:

<i>Issue No</i>	<i>Issue</i>	<i>Stakeholder No</i>	<i>Stakeholder Comment</i>	<i>Response</i>
1	Access	3a, 38, 57, 43, 54, 67	<p><i>Coillte are selling off land for the erection of phone masts. This land is then fenced and the public excluded from using it.</i></p> <p><i>Coillte has allowed paths and trails to fall into disrepair e.g. the Devil's Glen, Ashford, Co Wicklow and Portuma Forest Park. Park benches are in poor state of repair.</i></p> <p><i>There is a need for a more open door policy in forests. Padlocks on forest entrance gates discourage access.</i></p>	<p><i>While communications masts are located on Coillte land these are under leases and the land is not sold. Approximately 160 sites are in existence. Each site is approximately 0.04 ha giving 6.4 ha of land in total. These sites are normally fenced to prevent vandalism and therefore access from the 0.04 ha site is restricted. However access to the remainder of the wood is unaffected. The area of restricted access is therefore less than 0.002% of Coillte's total land area.</i></p> <p><i>While these sites were not visited by the assessment team others were found to be well maintained in terms of paths and facilities. Sites visited included Glendalloch, Glenshelane, Kilfinnan, Ballygannan and Managhee. These sites will be checked in future surveillance visits.</i></p> <p><i>Coillte has had an open access policy in operation as stated in the 1992 booklet Discovering Ireland's Woodlands. Coillte has installed gates and barriers on the main access points to most of their properties to prevent unauthorised vehicular access and reduce the incidence of fly-tipping and dumping.</i></p> <p><i>However while Coillte are required by the standard to take reasonable steps to prevent unauthorised use of its woodlands, where</i></p>

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<i>Issue No</i>	<i>Issue</i>	<i>Stakeholder No</i>	<i>Stakeholder Comment</i>	<i>Response</i>
			<p><i>Coillte should provide more information on access, wildlife and forestry at their recreation sites.</i></p> <p><i>Very few/no litter bins available.</i></p>	<p><i>permissive access has been previously been occurring Coillte must ensure that adequate consultation is undertaken before any changes to the current regime. Major CAR 02 was raised.</i></p> <p><i>Details of access and wildlife has been provided through a number of booklets and leaflets such as Discovering Ireland's Woodlands which provides details of 180 sites throughout Ireland. Additional details are available for the larger sites such as Guagan Barra, Farran and Ballyhoura.</i></p> <p><i>Coillte has a policy of not providing litter bins in its sites following incidences of abuse of these facilities. Visitors are requested to take away their rubbish. Sites visited by the assessment team were found to be free from litter and records of site maintenance visits included provision for removal of litter.</i></p>

<i>Issue No</i>	<i>Issue</i>	<i>Stakeholder No</i>	<i>Stakeholder Comment</i>	<i>Response</i>
2	<i>Archaeology</i>	<i>17, 31, 67, 45</i>	<p><i>The Burren Forest in Co Cavan is an important site in terms of geological and archaeological interest. The management of this site should include replanting with native species.</i></p> <p><i>Coillte are damaging archaeological sites</i></p>	<p><i>The Burren Forest was visited by the assessment team during the assessment. Managers were aware of the importance of this site. Management planning documentation for this site are currently being drawn up in liaison with archaeological bodies. Discussion is currently on-going as to the best methods of restructuring the existing forest cover.</i></p> <p><i>This site was planted in 1996. Plans indicate that a</i></p>

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<i>Issue No</i>	<i>Issue</i>	<i>Stakeholder No</i>	<i>Stakeholder Comment</i>	<i>Response</i>
			<p>e.g. Maughanislie.</p> <p>Sites have been damaged at <i>Sliabh na Caillaigh</i>, <i>Co Meath</i> and <i>Slaibh Bladhma</i>, <i>Co Offaly</i>.</p> <p>An archaeological site <i>Ballintubber Ringfort</i>, <i>Kilfinane</i> is threatened by earlier planting within 2m of the site.</p>	<p>buffer zone was left intact around the sites as a condition of Forest Service guidelines.. However no site visit was made and this site should be visited as part of a surveillance visit.</p> <p>Coillte does not own lands on <i>Slieve na Calliagh</i>.</p> <p>This area was planted in 1961. A buffer zone of 15 m has been marked on the ground which excludes machinery. Trees will be removed from the fort when the area is clearfelled.</p>
3	<i>Assessment</i>	5, 13, 70,77, 83	<p>This NGO does not support the Code of Best Forest Practice or the draft Irish FSC standard which will be used in the assessment.</p> <p>The manner in which the assessment field visits are selected is not impartial.</p> <p>Certification should be deferred until the Irish Standard is endorsed.</p>	<p>According to the QUALIFOR's FSC-accredited procedures, the draft FSC National Standard and the Code of Best Forest Practice have been used to prepare the assessment checklist. These have been used to supplement the QUALIFOR Programme checklist, which has been endorsed by the FSC.</p> <p>Selection of field sites visited during the main assessment was carried out under the control of the Team Leader. Sites were selected in order to allow a range of different forest types, locations, operations and site conditions. Particular attention was paid to active operational sites. The notification period given to Coillte of site selection was limited to only that required to allow for safe mobilisation of the assessment team.</p> <p>Assessment and certification prior to the endorsement of a national standard is permitted by</p>

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<i>Issue No</i>	<i>Issue</i>	<i>Stakeholder No</i>	<i>Stakeholder Comment</i>	<i>Response</i>
			<p><i>Two members of the SGS board are former employees of Coillte.</i></p>	<p><i>the FSC.</i></p> <p><i>Team member selection was carried out under the requirements of the QUALIFOR Programme procedures and Conflict of Interest Policy. This excludes persons from participating as a Team Leader if they have been employed by the organisation seeking certification within the past 5 years or as a worked as a sub-contractor in the past 3 years. Team members are excluded from participation if they have been employed by the organisation seeking certification within the past 5 years or as a worked as a sub-contractor in the past 3 years. All team members met the requirements of this procedure.</i></p>
4	Chemicals	1, 3a, 3d, 7, 19, 21, 39, 50, 60, 67, 67, 71, 72	<p><i>Lindane applied within 5 m of a school at Ballymacaward, Ballinasloe, Co Galway in May 1999. Reports of health problems in pupils are a result of use of chemicals near the school.</i></p> <p><i>Sites can be treated without locals knowing except for a little sign.</i></p>	<p><i>This issue relates to two Coillte compartments opposite a primary school. These compartments were felled in 1997/7 and restocked in 1998. Examination of records shows that 25.2 l of Lindane was sprayed in May 1998 and 25.0 l of Glyphosate was sprayed in May 1999. The school is separated from the treated area by a highway and a hardwood screen. It has not been established that the application of these chemicals has contravened current guidelines. However the manner in which consultation with the local community and in particular the local school was carried out does not meet the requirements of the standard. Major CAR 02 was raised. Records of chemical applications show that Lindane is not currently applied by Coillte.</i></p>

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<i>Issue No</i>	<i>Issue</i>	<i>Stakeholder No</i>	<i>Stakeholder Comment</i>	<i>Response</i>
			<p><i>Lindane and other chemicals dumped in Slieve Bloom forest</i></p> <p><i>The Medite MDF plant has been warned that formaldehyde levels are dangerously high around the plant.</i></p> <p><i>Little effort has been made to move away from the use of chemical fertilisers.</i></p> <p><i>Much of the aerial applications of fertiliser ends up in our streams and lakes causing eutrophication.</i></p> <p><i>Coillte are spraying dangerous chemicals by helicopter. This is banned in Ireland</i></p>	<p><i>Used chemical containers were found within a derelict farmhouse at Ballyhuppahane, Mountrath Forest. This consisted of:</i></p> <p><i>1 x Silvapron D</i></p> <p><i>3 x Gammacol</i></p> <p><i>3 x Fostermark Dye</i></p> <p><i>1 x Polytetrafluoroethylene</i></p> <p><i>1 x gerry can (petrol)</i></p> <p><i>3 x 500ml unknown</i></p> <p>Minor CAR 13 was raised.</p> <p><i>This issue is outside the scope of this assessment.</i></p> <p>Major CAR 12 was raised. <i>Coillte must prepare an adequate strategy for the reduction of chemical use.</i></p> <p><i>Coillte has developed systems for reducing the use of aerial fertilisation in areas of high sensitivity such as Lough Corrib. This includes use of alternative species and the requirement for foliar analysis prior to decision making on fertilising. Research work has been initiated following problems of run off in the past.</i></p> <p><i>The application of fertiliser by helicopters is not prohibited in Ireland.</i></p>
5	<i>Commitment</i>	7, 71	<p><i>The Forestry Act 1988 is deficient from an environmental viewpoint. The Act does not acknowledge the recent international conventions on sustainable forestry or</i></p>	<p><i>Assessments under the QUALIFOR Programme can only be made against existing standards and legislation, and must therefore take into account the Forestry Act 1988.</i></p>

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<i>Issue No</i>	<i>Issue</i>	<i>Stakeholder No</i>	<i>Stakeholder Comment</i>	<i>Response</i>
6	Consultation	5, 6, 19, 38, 23, 21, 45, 9, 10, 51, 67, 68, 71, 71, 73, 74, 75, 81	<p><i>biodiversity. The Act merely states that Coillte should have “due regard to the environmental and amenity consequences of its operations”. This is the only sentence in the Act that refers to the environment and is inadequate for FSC certification.</i></p> <p><i>Our legitimate role as an NGO has been undermined by the Forest Service and the national FSC process.</i></p> <p><i>Coillte recently organised SFM workshops on behalf of the Forest Service. NGOs and local groups received no formal invitations and were informed only as an afterthought.</i></p> <p><i>Local communities question Coillte’s commitment to true consultation and to taking community and environmental concerns into their management plans.</i></p> <ul style="list-style-type: none"> • <i>Consultation by Coillte with community groups in the Coolea/Ballyvourney district in Macroom has not been good.</i> • <i>Coillte is not responding constructively to local concerns at Monivea.</i> 	<p><i>Coillte is also subject to the Forestry Acts of 1946 and 1976, and must also abide by the Code of Best Forest Practice and relevant Guidelines. Minor CAR 01 was raised because, while Coillte’s commitment to Sustainable Forest Management has been documented there has been no documented commitment to the FSC which has been made publicly available.</i></p> <p><i>The QUALIFOR Programme must operate within its accredited procedures, which require us to work with the national FSC process and take account of draft national FSC standards.</i></p> <p>Major CAR 02 was raised to require Coillte to pro-actively consult NGOs and other stakeholders, which has included the establishment of social and environmental panels through which this type of discussion should be channelled (see section 9)</p>

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			<ul style="list-style-type: none"> At Lough Muckno, Castleblayney, Co Monaghan are not consulting adequately with local people <p>Coillte should be more open in discussions with Elected Members and other non-elected groups.</p> <p>Consultation practices are changing within the last two months but too early to say how far the changes will go.</p> <p>Coillte must lose their 'know best' attitude and start to listen to and talk with locals.</p> <p>There have been some examples of good consultation but this is due to the local managers – most are lacking in consultative skills.</p> <p>Senior managers are too removed from the process and do not engage pro-actively.</p>	<p>Major CAR 02 was raised.</p> <p>Major CAR 02 was raised. The response to this CAR includes the training of Coillte staff in consensus building and conflict resolution.</p>
7	Deer	48, 61	<p>Farmers are having problems with deer moving out from Coillte properties.</p> <p>Deer stalkers are not getting consulted before clearfelling which does not allow for advance planning.</p> <p>Deer and wildlife exploited for commercial gain.</p>	<p>Minor CAR 06 was raised to require documented deer management plans to be developed in all regions where necessary.</p> <p>Minor CAR 06 was raised. The control of deer is a necessary part of forest management in particular when even-aged forests are restructured.</p> <p>The letting of sporting rights is not prohibited by the FSC P&C. It does however require that any game management is carried out under adequate game management plan. While plans are available in</p>

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				<i>some areas this was not found to be consistent throughout Coillte. Minor CARs 06 and 07 were raised.</i>
8	<i>Economics</i>	<i>3a, 5, 16, 51, 67</i>	<p><i>Coillte is not interested in research, and is a business set up to make a profit. Coillte's profits come from selling game licenses and selling off assets such as machinery and land.</i></p> <p><i>Coillte should investigate the supply of residues for biomass.</i></p> <p><i>The privatisation of Coillte should not be allowed.</i></p> <p><i>The Louisiana Pacific MDF plant has an appalling environmental record. Coillte put money into this venture which is losing money. Other Coillte business ventures – fence posts, garden furniture, telegraph poles are low quality.</i></p> <p><i>The price of Spruce timber is so low that money is lost</i></p>	<p><i>Coillte maintains a Research and Development Division. The Irish National laboratory for Forest Protection and Health is located at Coillte's Newtownmountkennedy regional office and is run by Coillte on behalf of the Forest Service. However almost 50% of the R&D budget is sourced from Coillte's own funds. The R&D Division has a considerable history of research. While until recently programmes have focused on establishment and monitoring processes there is increasing work within the fields of harvesting and biodiversity. Current projects include research on pest, vegetation and disease management, hydrology and tree breeding.</i></p> <p><i>The decision on the future ownership of Coillte rests with the shareholders, the Minister for the Marine and Natural Resources and the Minister of Finance. The FSC standard does not prohibit the privatisation of forest resources.</i></p> <p><i>The scope of this assessment is the forest management of Coillte. Business ventures outside of this cannot be addressed under the scope of this assessment.</i></p> <p><i>Examination of the financial returns of harvesting operations</i></p>

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			<p><i>harvesting.</i></p> <p><i>Coillte's forests do not provide for any new forest industry and provide few jobs. We would expect Coillte to help small users of hardwoods. No serious attempt has been made to develop a native hardwoods industry.</i></p> <p><i>The economic viability of Coillte is questionable given that they produce low grade Sitka spruce and other non-native conifers. These conifers are liable to windthrow and there is a predicted glut of softwood material on the international market.</i></p>	<p><i>indicated that a number of thinning operations are carried out in a net cost if one takes the cash flow for that single operation. However while individual thinning may be carried out at a net cost, the benefits of thinning in terms of product break-out and final net discounted revenue are positive, according to research..</i></p> <p><i>In an attempt to develop the use of broadleaves Coillte has recently initiated a project to source hardwood timber for the Dundrum sawmill. A new co-ordinating post has been created in order to facilitate this initiative.</i></p> <p><i>Due to the specific characteristics of public afforestation in Ireland over the past 50 years a number of areas were planted which may now be considered as marginal or sub-marginal for forestry development. Similarly in some of the earlier plantations the species selection has proven to be less than optimal. However as part of the requirements of the standard Coillte are obliged to manage these areas appropriately. This may include restructuring, reinstatement or modifications to species selection. Therefore while undoubtedly individual operations may be carried out at a cost to Coillte the corporate returns identify that forest operations as a whole are economically viable.</i></p>
9	<i>Fire</i>	4, 72	<p><i>Farmers are worried about the risk of fire near plantations and have to pay increased insurance premiums</i></p>	<p><i>A fire did occur at Maulevanig in 1995 although outside the Coillte property. A fire plan is in existence for the property.</i></p>

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			<p><i>due to increased risk. Little consultation with neighbours e.g. Maulavanig.</i></p> <p><i>Fire protection in Mayo is inadequate.</i></p>	<p><i>Coillte has decided to improve consultation on fire plans by making plans available for public viewing.</i></p> <p>Major CAR 02 was raised with respect to consultation.</p> <p><i>Fire plans were seen by the assessment team in Western Region and were found to be appropriate including maps, rendezvous points water sites, contact details, helicopter standby details, specialised fire fighting equipment.</i></p>
10	<i>H&S</i>	32	<p><i>Coillte has only recently initiated the requirement for site specific risk assessments as part of their operational plans.</i></p>	<p><i>Site risk assessments were available for all operational sites visited by the assessment team, and for other sites which were not visited but the site files for which were examined. It is however acknowledged that this system is relatively new. Continued compliance by Coillte should be monitored through subsequent surveillance visits.</i></p>
11	<i>Habitats</i>	3b, 3c, 3e, 5, 7, 15, 16, 19, 22, 45, 46, 60, 67, 71, 77	<p><i>Drainage and ploughing have destroyed large areas of blanket bog. Blanket bogs should not be planted with Sitka spruce. There has been a history of afforestation on sensitive sites. Conifer plantations offer little in habitat for birds and are low in biodiversity. We should be consulted when new plantations are planned. Existing wildlife corridors, riparian zones and mosaics of stands are less than adequate in the majority of properties. Only 2000 ha of the total estate is managed with special wildlife or conservation</i></p>	<p><i>As mentioned in response to Issue 08 the environment in which in which a number of afforestation sites were established in previous decades is markedly different from the current situation. Hence by the nature of the previous selection of afforestation sites and afforestation practices Coillte now has a number of sites which require significant amendment to management objectives and considerable restructuring. It is acknowledged that a number of existing plantations incorporate adequate corridors or riparian zones. Major CAR 03 was raised as adequate</i></p>

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			<p>consideration.</p> <p>Coillte has an inadequate environmental policy and what does exist is not reflected on the ground.</p> <p>Dergbey oak woodland, Derryloughan planted flush to the canopy with conifers. Tomies Wood, Muckcross National Park oak wood underplanted with conifers. Kilmeedy Wood Ballinruane Forest – semi-natural oakwood clearfelled</p> <p>The roosting sites of the lesser horseshoe bat should be protected. Towerhill Wood, Moorehall wood, Co Mayo; Pigeon Hole Wood, Ballykyne Wood, Ardnageeha Wood, Co Galway; Curraghchase, Co Limerick; Curraglass/Rossacroon aloo Wood, Ardtully Wood, Dromore Wood Co Kerry.</p> <p>Hen harrier habitat is being destroyed at The Steeple, Broadford Village, Newcastle West.</p> <p>Coillte should ensure that its considerable reserve of unplanted land remains unplanted and managed positively for wildlife. Within the conifer component there must be a commitment to</p>	<p>planning of how to incorporate these areas was not available through appropriate restructuring plans. Minor CAR 04 was raised because adequate evidence of appropriate appraisal of potential environmental impacts was not available for all operations. Major CAR 05 was raised due to the absence of details within planning documentation of areas managed with conservation as a major objective.</p> <p>For the past 6 years Coillte has been in liaison with the Vincent Wildlife Trust regarding some of these sites. Major CAR 05 was raised due to the fact that not all areas and features of biodiversity value such as feeding, breeding or roosting sites are identified, mapped and protected.</p> <p>Duchas is currently undertaking a survey of Hen Harrier habitat sites in the Mullaghareirk/Newcastlewest area. Preliminary findings suggest that the number of breeding pairs is increasing in particular in young restock sites. Current advice from Duchas is to continue with clearfell/restock using small coupe sizes.</p> <p>Major CAR 05 was raised because adequate management planning indicating how large even-aged plantations were going to be restructured to incorporate these features.</p>

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			<p><i>biodiversity. This will involve a) leaving stands to grow to full maturity in each forest, b) staggering the harvesting to create mosaics, c) developing non-clearfelling techniques of harvesting, d) a variety of measures targeted at individual species.</i></p> <p><i>The 1946 Forestry Act does not permit areas to be felled and not replanted therefore restoration of open habitats is not possible.</i></p>	<p><i>The Act does allow for exemption from restocking through the issue of a limited felling licence with the restoration of the former habitat listed as a specific condition.</i></p>
12	<i>Harvesting</i>	9	<p><i>Supervision of contractors is deficient in terms of potential environmental problems. Extraction routes run too close to streams and watercourses e.g. Owenboliska, New Village, Letterkeeghaun and Terranacoona.</i></p>	<p><i>These areas have been identified by Coillte and Western Region Fisheries Board in planning documents as sensitive following harvesting impacts in 1994, 1996 and 1998. New Village was visited by the assessment team. Records show that supervisory visits were made 2-3 times per week. Contractors records were found to comply with the requirements for adequately trained and experienced contractors. Extraction routes were found to be appropriately placed and planning documents included details of environmental protection measures such as silt traps, use of brash mats, agreement on extraction routes.</i></p>
13	<i>Haulage</i>	6, 10, 11, 27, 57, 67, 81	<p><i>Local communities are concerned about overloaded lorries travelling on public roads in Limerick, Leitrim and Co Mayo. Heavy loads are causing damage to roads. Coillte should provide funds to</i></p>	<p><i>Liaison was initiated with Leitrim County Council on timber movements in 1985. Within Limerick forecasts of timber production for the next 10 years were presented to the Council together with details of the main haulage routes that these would use. The</i></p>

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			<p><i>compensate local authorities. Roads are being damaged by trucks serving forestry. Coillte should contribute to the maintenance of these roads.</i></p> <p><i>Timber haulage practices do not conform to the Road Traffic Act or Tachograph hour requirements.</i></p> <p><i>Lorries are over weight but unpoliced</i></p>	<p><i>report details predicted production volumes by year and outlines the likely haulage route from the forest. Details of discussion between Coillte and Limerick County Council amending details of haulage routes were seen by the assessment team. Limerick County Council was contacted and commented that there were no major issues at present, that liaison had been improved within recent years and FMU plans should provide a good basis for forward planning.</i></p> <p><i>The specific issues of RTA and tachograph requirements were not investigated in depth during the assessment. These issues should be followed up during surveillance visits.</i></p> <p><i>A sample of recent weigh-lines were inspected by the assessment team. Where weight limits had been broken, there was evidence that timber purchasers had been requested to ensure legal limits were respected. The assessment team recognises that this issue warrants further examination and should therefore be followed up in subsequent visits.</i></p>
14	Landscape	4, 15, 21, 38, 42, 45, 48, 57, 60, 63, 67, 71 81	<p><i>Monocultures impact on visual amenity. Landscape planning is very poor especially in older plantations. Management should ensure that viewpoints are not obscured by planting or by growing trees. Clearfelling is having an impact in areas of high scenic value e.g. Glenurquhart, Co Wicklow and</i></p>	<p><i>As mentioned in response to Issues 08 and 11 many properties retain their original plantation characteristics. The process of restructuring is aimed in part at improving the visual amenity of large even-aged blocks. CARs 03 and 11 were raised.</i></p>

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			<p><i>Carrickgollen, Co Dublin</i></p> <p><i>The viewpoint known as the Spout, Broadford Village, Newcastle West has been planted and locals are worried about the loss of historic viewpoint</i></p> <p><i>Felling at Gougane Barra has impacted on the tourist attraction</i></p> <p><i>Clearfelling at Ravensdale Wood has been carried out in an insensitive manner causing great visual impact.</i></p> <p><i>Windrows are visually intrusive.</i></p> <p><i>Coillte have allowed the erection of a telecommunications mast on their land on the pinnacle of Slieveveagh, Kilfinane – as well as damaging the landscape and a favourite local landmark, the site is one frequented by hen harrier, peregrine and occasionally merlin. The site was a potential nesting site.</i></p>	<p><i>The land at the Spout is not owned by Coillte.</i></p> <p><i>The total area of the Gougane Barra Forest Park is 108.3 ha. The forest was planted between 1938-42. A total of 19.6 ha has been felled to date. A large coupe of 14 ha was clearfelled in 1989 and did have an impact on the landscape. Since this Coillte has initiated a system of landscape sensitivity analysis which requires consideration of landscape impacts. Also Minor CAR 004 was raised.</i></p> <p><i>Harvesting works have been ongoing for the past 20 years with increased areas in the mid 1990s. A landscape plan was drawn up in 1997 by a landscape architect</i></p> <p><i>Minor CAR 04 was raised in connection with the requirement for adequate appraisal of impacts. While an Bord Pleanala granted planning permission on appeal Coillte must ensure that all operations undertaken within the forest comply with the requirements of the standard.</i></p>
15	<i>Legal</i>	66	<p><i>The Judgement of the Court of Justice of the European Communities on 21 September 1999 was that Ireland had failed to fulfil its</i></p>	<p><i>The ruling of the Court does not detail that significant adverse environmental impacts have resulted from afforestation projects, only</i></p>

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			<i>obligations under Directive 85/337/EEC. The Irish authorities intend to adopt new planning legislation but until this is done Coillte cannot be certified.</i>	<i>that the Irish Government failed to adequately transpose part of the original EIA Directive. When new planning legislation is adopted, Coillte will have to comply. Nonetheless, Coillte must ensure that adequate environmental appraisal of potential impacts is carried out for all operations. Minor CAR 004 was raised.</i>
16	<i>Litter</i>	43, 60, 80	<i>There are too many white plastic bags left in the woods apparently by the Forest Service. In Ballyhooley Forest Coillte are burying litter collected in the wood.</i>	<i>During field visits no instances of discarded planting bags were seen by the assessment team, however collected bags ready for disposal were noted at restocking sites.</i>
17	<i>Employment</i>	26, 61	<i>Coillte's commercial aspects of forestry management have taken precedent over Coillte's social and environmental obligations. Contractors are faced with little stability or long term contracts with Coillte.</i> <i>The number of directly employed people has reduced over the past ten years.</i> <i>Coillte are not ensuring that contractors follow requirements of Relevant Contracts Tax.</i>	<i>Coillte currently has a staff complement of 934 employees in the Regions and 125 staff at HQ. Before the formation of Coillte in 1989, the former Forest Service had an employee role of some 2500. While there has been a reduction in staff numbers of some 20% since the 1995 levels this is a similar situation to that which has occurred internationally within the forest sector through developments in technology and systems.</i> <i>The assessment team was unable to identify any instances where RCT guidance was not being followed. This issue should be followed up during surveillance visits.</i>
18	<i>Rural economy</i>	31, 34	<i>Coillte do not give opportunities to small mills for the purchase of small parcels of timber. Coillte's forward sales means that mills have all the timber they require. It is difficult for private woodlands to sell their timber. Coillte</i>	<i>While the vast majority of Coillte's timber is sold through forward contracts and its fortnightly on-line timber auctions the opportunity does exist for sales of small or specialised parcels. Local managers have the capacity to authorise small</i>

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			<i>give discount to mills therefore driving down prices.</i>	<i>local sales. During the period 01-06/00 local sales as small as 1 m³ were recorded and the average local sale was for 106 m³. The on-line auction also includes small parcels as small as 30 m³ individual lots and scheduled multiple deliveries of 300 m³ over an agreed period of time. The requirement by Coillte that all harvesting meets H&S and insurance requirements has meant that a number of small purchasers who previously bought standing timber are now restricted to roadside sales until such time they meet the minimum requirements.</i>
19	<i>Silviculture</i>	5, 16, 31, 37, 63	<p><i>Coillte is the embodiment of the Irish Government's official forestry strategy. We oppose the strategy as it is weak on environmental and social issues. The policy advocates clearfelling which is environmentally and socially unacceptable.</i></p> <p><i>Thinning is considered as uneconomical and is rarely carried out, nor is restructuring.</i></p> <p><i>No significant areas where alternative management regimes are used.</i></p> <p><i>Coillte are replanting Sitka in areas where the previous crop has blown. It is uneconomical to plant Sitka in areas where it</i></p>	<p><i>This assessment relates to Coillte's management of their forest resources and its compliance with the FSC standard.</i></p> <p><i>An evaluation of official government policy is outside the scope of this assessment.</i></p> <p><i>Thinning programmes were investigated by the assessment team and were found to be planned and generally well implemented. Recent windblow has affected thinning schedules as efforts are made to clear blown material.</i></p> <p>Major CAR 03 was raised with regard to restructuring. Major CAR 10 was raised with regard to use of alternative silvicultural systems.</p> <p><i>The selection of species must be carried out to meet both management objectives and the site capability. Major CAR 19 was raised. While</i></p>

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			<p><i>will not grow to 70' before it blows over.</i></p> <p><i>Coillte are harvesting in excess of sustainable yield. Since 1988 rotation lengths have reduced from 45 to 32 years and average tree at clearfell has reduced from 1.2 m³ to 0.3-0.4 m³.</i></p>	<p><i>windblow is endemic in Ireland Coillte's managers are aware of the risks and thinning regimes are adapted to suit conditions.</i></p> <p><i>The assessment team found no evidence to suggest that harvesting was being carried out in excess of sustainable yield. Where reconciliation between targets and yields were inspected these were found to meet the requirements of the standard. Through the replacement of poor-performing stands, and site improvements through ground preparation and tending average yield class has been steadily increased in recent years which will reduce rotation length. The reduction in clearfell diameter reflects changes in demand for smaller dimension material.</i></p>
20	SNW	7, 45, 62	<p><i>In the few native woodlands which survive Coillte plantations are often planted right up to their borders with little attempt made to provide proper buffer zones or gradation from native woodland to plantation e.g. Glen of the Downs NR. Coillte has made no effort to restore the natural forest cover of an overall forest management area. There has been no restoration of semi-natural woodlands that were planted with conifers in the past. E.g. The Wilderness and Green Gate Woods, Castleoliver, Kilfinane, Ballyking and Cong Woods.</i></p>	<p>Minor CAR 04 and Major CAR 05 were raised regarding the appraisal of impacts arising from forest management operations and the requirement to identify and protect areas and features of particular biodiversity value.</p> <p>Minor CAR 17 was raised in connection with adequate planning for management of semi-natural woodlands.</p>
21	Soil Erosion	68	<p><i>Due to clearfelling severe soil erosion has</i></p>	<p><i>Woodstock forest was visited by the assessment</i></p>

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			<p><i>occurred at a slope overlooking the main Galway-Moycullen road in November 1998.</i></p> <p><i>Problems of severe soil erosion and compaction due to harvesting have occurred at Yellow Bog in Loughrea and several places around Sally Gap.</i></p>	<p><i>team and no evidence of erosion was identified within the blocks felled in 1998.</i></p> <p><i>Yellow Bog was visited by the assessment team. While the site has been felled and mounded there was no evidence of erosion, the site is very flat. Drains have been cut however without sump ends and due to the site are very deep in places.</i></p>
22	<i>Species</i>	<i>3a, 3d, 5, 7, 19, 24, 31, 38, 43, 46, 54, 63, 67, 68, 72, 76, 77, 78</i>	<p><i>Coillte should be planting more broadleaves. Coillte plant only 1% broadleaves. Coillte mix should be 50:50. Coillte plant too much spruce monoculture in scenic areas.</i></p> <p><i>Native trees should have the priority in plantations.</i></p> <p><i>Coillte continue to plant at least 80% Sitka spruce with a view to clearfelling.</i></p> <p><i>Coillte has removed many acres of broadleaved woodland which existed on the old estates and replanted them with Sitka spruce.</i></p> <p><i>Most plantations are of even-age, non-native conifers bearing no resemblance to native woodland and inimical with the Irish landscape. Most plantations are composed of Sitka spruce, broadleaves comprise a tiny percentage (5%). Native species form a smaller percentage still. In the Farm Partnership even on land suitable for broadleaves, Coillte</i></p>	<p><i>The standard requires that:</i></p> <p><i>‘The species chosen for plantations are suited to the site and matched to the objectives. Decisions on species selection should take into account current and future market expectations for forest products.</i></p> <p><i>The proportions of different types of species are as follows. The Forest Design Plan shows how these percentages will be achieved.</i></p> <ul style="list-style-type: none"> <i>• < 65% Primary Species;</i> <i>• > 20% Diverse Species;</i> <i>• > 10% Broadleaf;</i> <i>• > 5% Open Space.</i> <p><i>Where only one commercial species is adapted to the site:</i></p> <ul style="list-style-type: none"> <i>• < 80% primary species;</i> <i>• > 10% Broadleaf;</i> <i>• >10% actively managed for biodiversity, and open space</i> <p><i>The requirements for species percentages apply at FMU level rather than at individual coupe level. Because not all FMUs currently meet these minimum percentages, and do not adequately detail how the percentages will be achieved in the</i></p>

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			<p>still plants mostly Sitka spruce.</p> <p>The EU norm is 4:1 broadleaves:conifer. Ireland is way out of line. Coillte's 20% target for broadleaves is too low. Coillte should be planting at least 50%.</p> <p>Coillte has planted Sitka spruce without first subjecting the species to ecological trials. The Irish evidence is that exotic species such as Sitka do have a negative ecological impact on other ecosystems, especially when they are in intensively managed plantations.</p> <p>Coillte do not produce sufficient quantities of Scots pine and Douglas fir for the transmission pole market in Ireland.</p> <p>Species percentages in FMU plans for West Cork, Galtee and Suir/Nore/Barrow FMUs do not meet the requirements of the standard.</p> <p>Within the Gougan Bara National Park Coillte has removed lodgepole pine and replaced it with Sitka spruce.</p>	<p>future, Major CAR 19 was raised.</p> <p>Major CAR 19 was raised.</p> <p>In 1990 a 14 ha coupe was felled and replaced with 75% Sitka spruce. This is not in contravention of the standard. The requirements for species percentages apply at FMU level rather than at individual coupe level. Major CAR 19 was raised in connection with species percentage requirements and selection of species.</p>
23	<i>Tenure</i>	1, 3a, 7, 10, 13, 39, 47, 53, 63, 72, 76, 77, 78	<p>Coillte have acquired and planted common land in Ballinasloe, Co Galway which held eight turbary rights. Access to this piece of</p>	<p>This case was heard in the Galway Circuit Court on 03/03/98 and at appeal in the High Court in 16/11/98 and action has followed the</p>

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			<p><i>land was via a disputed right of way.</i></p> <p><i>An ex-Coillte manager has built a house in Avondale Estate – which was given to Coillte in trust.</i></p> <p><i>Coillte have sold a felled conifer site at Dunstown Wood, Kildare to Bord na Mona who are applying for planning permission for a power station. Locals are upset about this transfer.</i></p> <p><i>Locals near Tara Hill Wood are concerned about the conservation future of the wood if Coillte are privatised.</i></p> <p><i>Three sites in Cork and three in Waterford have been offered by Coillte as potential sites for landfill without local consultation.</i></p> <p><i>At Portumna Forest Park an action group was set up against the sale of the woods and clearfelling and deer culling</i></p> <p><i>In Lough Eske 35 acres were sold to a developer. Coillte claimed that the conditions of the sale would protect the environment. These environmental restrictions included by Coillte were not legally binding and a hotel has been proposed for the site.</i></p> <p><i>Fences that are Coillte's responsibility are not always maintained.</i></p> <p><i>Cattle found on Coillte's land is impounded by</i></p>	<p><i>decisions of the courts.</i></p> <p><i>This site was not visited during the main assessment and this issue should be followed up during subsequent visits.</i></p> <p>Major CAR 02 was raised regarding the lack of adequate consultation by Coillte for proposed changes in forest management.</p> <p>Major CAR 02 was raised regarding the lack of adequate consultation by Coillte for proposed changes in forest management.</p> <p>While a number of fences were seen by the assessment team which were not stock-proof, evidence was seen of Coillte's response to requests by neighbours to</p>

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			<p>Coillte.</p> <p>Headage payments have been stopped by Ministry of Agriculture after Coillte reported cattle tag numbers of cattle in Coillte forests.</p> <p>Coillte should not sell of land at Dundrum.</p> <p>Coillte has sold a 60 acre site on Lough Corrib which is important for landscape and amenity reasons.</p> <p>Coillte has disposed of properties which had amenity and or environmental value. One of the few forest parks, Lough Key, is being made available for private tourist development .</p> <p>Coillte land is unsuitable for use as landfill sites.</p> <p>The Watergrasshill area should not be sold off for landfill.</p> <p>Coillte should not sell off 60 ha of woodland as proposed for a landfill site as it is in an ESA, the River Lickey contains shellfish protected by EU legislation.</p>	<p>maintain fences. It is a requirement of the standard that Coillte safeguards its woodlands from unauthorised uses including unauthorised stock grazing and over wintering of livestock.</p> <p>Major CAR 02 was raised regarding the lack of adequate consultation by Coillte for proposed changes in forest management.</p> <p>Major CAR 02 was raised regarding the lack of adequate consultation by Coillte for proposed changes in forest management.</p> <p>The procedure adopted by local authorities for purchase of landfill sites has been that the local authorities engage consultants to carry out desk surveys of the areas concerned and to select sites (regardless of ownership) for further investigation. At this point owners may be asked to provide information to the local authority on their land ownership. The consultants eliminate sites through walkover surveys and select a shortlist of sites for detailed investigation. The selection of sites is governed by EPA criteria such as topography, soil, drainage, population density. When candidate sites are identified the local authority can negotiate purchase of the land, however the provision of compulsory purchase is available.</p>

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			<p><i>Coillte should not sell off to the highest bidder 80 acres at Foley's Glen Tralee as it was gifted to Coillte to be preserved for the community.</i></p> <p><i>What is Coillte's policy for disposal of land?</i></p>	<p>Major CAR 02 was raised in relation to inadequate consultation. Coillte must ensure that adequate consultation is carried out if sales of land are proposed.</p> <p>The land at Foley's Glen has unencumbered title and was bought by the former Forest Service and planted in 1979.</p> <p>Major CAR 02 was raised regarding the lack of adequate consultation by Coillte for proposed changes in forest management.</p> <p>Each year Coillte disposes of a limited area of land. In 1999 the area was equivalent to 0.11% of its estate. Between January to July 2000 Coillte had sold 139.3 ha with an average sale of 2.8 ha. Most sales are in response to a local enquiry. The type of property sold includes former house sites, new building plots, areas adjoining neighbours land and land for development. Coillte sells land when the sales price is greater than its value as a forestry investment using a 3% discount rate. All land sales are considered by a signing off committee, with larger sales requiring approval from the Board of Directors.</p>
24	<i>Training</i>	68, 5, 1, 3	<p><i>The biggest gap in training I have seen that influences the principles of SFM is lack of knowledge and data available about soils.</i></p> <p><i>There is only one trained ecologist for the entire country. Most Coillte employees do not have the training to</i></p>	<p><i>Throughout the assessment the assessment team found that Coillte staff worked in a professional manner in line with the professional organisations in Ireland such as the Society of Irish Foresters. Where skills were absent (eg ecology and landscape appraisal) training programmes had been initiated to ensure</i></p>

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<i>Issue No</i>	<i>Issue</i>	<i>Stakeholder No</i>	<i>Stakeholder Comment</i>	<i>Response</i>
			<p><i>identify rare plants or habitats.</i></p> <p><i>Coillte staff are unprofessional and lack training.</i></p>	<p><i>that sufficient staff had received appropriate training. In particular an additional consultant has been recruited to assist in the preparation of management plans with the training of local staff in plant and habitat identification an additional objective.</i></p>
25	<i>Water</i>	3, 7, 9, 15, 18, 25, 39, 45, 48, 53, 57, 60, 67, 70, 79	<p><i>Coillte clearfelling and restocking practices are responsible for the flash flooding at Burncourt, Tipperary on 16 May 2000.</i></p> <p><i>Coillte plantations have been shown to degrade water quality especially in the west of Ireland where the environment is sensitive to disruption. Streams and rivers are void of aquatic life due to acidification from concentrations of Sitka spruce plantations in state forests planted close to water courses. Streams are also becoming silted due to ploughing and draining. Many streams have been planted within a very short distance.</i></p>	<p><i>This site was visited with staff from the regional fisheries board. It would appear that intense rainfall occurred on the moorland above the Coillte property which was then channelled through this deep gully. There was no evidence to suggest that the flash flood had 'started' within Coillte's property as a result of clearfelling, rather that the flood travelled through the property but was initiated at a higher altitude. Considerable volumes of sand and stone have been moved by the flood however these appear to come from the river bed rather than from clearfell sites.</i></p> <p><i>Extensive afforestation programmes took place in 1970s and 1980s in Donegal, Co Wicklow and Conemara. The Coillte Board ceased acquisition and afforestation of deep peat areas in 1990. Very limited afforestation has taken place on these areas since then except for fill-in and access works. There is considerable harvesting planned for these areas as they move into production over the next decade. All works will have to comply with the relevant Codes of Practice and Guidelines. Restructuring (see Major CAR 03) should play a major role in improving these stands in terms of</i></p>

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<i>Issue No</i>	<i>Issue</i>	<i>Stakeholder No</i>	<i>Stakeholder Comment</i>	<i>Response</i>
				<i>environmental benefit.</i>
			<p><i>Elevated phosphorous levels have been recorded in the Derrymoyle River system. Phosphorous loss to water courses is a concern in general.</i></p>	<p><i>Raised P levels were identified in 1997 arising from hand application of P on restock sites. Water quality monitoring has been put in place the results from which indicate that P levels have returned to baseline levels. Following this incident species selection has been amended where sites will be restocked with pine unless spruce can be expected to perform without fertiliser. For existing restocked sites application of P is to be delayed until vegetation cover has been re-established.</i></p>
			<p><i>The number of complaints has receded sharply this year although a serious incident did arise in the Bundorragha catchment as a result of construction of a turntable during the spawning season adjacent to a culvert flowing into the Glenumera River.</i></p>	<p>Minor CAR 04 was raised. <i>Coillte must ensure that the potential impacts of all forest operations are adequately appraised prior to implementation.</i></p>
			<p><i>We are concerned about future harvesting near fisheries in Cashel. In the 1980's we had problems with siltation following forestry operations.</i></p>	<p><i>A number of sites were visited near Cashel with the Regional Fisheries Board. While general improvements in practice have been made and Coillte have been quick to respond to issues raised by the RFB there is still room for improvement.</i></p>

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<i>Issue No</i>	<i>Issue</i>	<i>Stakeholder No</i>	<i>Stakeholder Comment</i>	<i>Response</i>
			<i>Coillte has damaged waterways on Kilcruigh Mountain Kilfinane due to careless siting of tracks across streams and planting too close to waterways. Felling outside Kilfinane has caused such siltation that salmon beds had to be dredged in 1999.</i>	<i>Siltation of the Loobagh river occurred in December 1998 as a result of harvesting operations in Moorstown. Liaison is ongoing with the Shannon Region Fisheries Board on a programme to mitigate damage.</i>

7.3. Issues raised by Peer Reviewers

This report was reviewed by three independent peer reviewers. The following points were raised:

Issue Raised	Response
Stakeholder consultation raised several specific examples of local concerns - paths, trails, litter etc. In some situations it would appear that no particular follow-up was carried out – rather the report concluded that standards appeared to acceptable elsewhere. I would have preferred to have seen some further investigation.	A number of the stakeholder comments were received after the commencement of the assessment visits and it was not considered appropriate to re-visit regions and the named sites. The approach adopted was to ensure this issue was adequately considered at subsequent sites during the assessment, and commit to visit the named sites during subsequent surveillance visits.
It is not entirely clear from the draft report on what basis certification requirements ought to be applied within these FMUs - e.g. in relation to species composition of forest stands and allocating areas to be managed with biodiversity as a major objective.	The basic focus is at the level of the FMU. Over the FMU, species percentages and areas managed for biodiversity as a major objective must meet minimum requirements. While it would be inappropriate to require every forest block to meet these minimum requirements, it would also be inappropriate for larger blocks not to include provision for biodiversity and develop strategies to incorporate species diversity. This has been carried out through Coillte's landscape sensitivity assessment, and the identification of potential biodiversity areas which will be ratified following ecological survey.
There is merit in encouraging the applicant to define less extensive	The decision on the setting of FMU boundaries is necessarily that of the

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<p>FMUs. This would give greater confidence that the environmental requirements of the certification process were deliverable at a local level rather than at a broad regional or landscape level.</p>	<p>forest manager as the FMU planning system should reflect the manner in which the forest is actually managed. There is considerable difference in the way in which the regions have approached this issue. FMUs within the Western Region have been split into over 120 landscape units each of which builds up to form the individual FMUs. Following the completion of the main assessment however, Coillte has announced the restructuring from 6 to 4 regions within each of which 3 or 4 FMUs will be managed as districts. The development of the model used within the Western Region should be considered for use as part of the on-going monitoring programme.</p>
<p>While Coillte's new SOPs do include requirements for appraisal of the impacts of forest operations the assessment team gathered evidence that these were not being properly implemented. Indeed the report describes several examples where unnecessary impacts on the environment have resulted. This relates specifically to 5.1 and 6.1/2. Coillte's poor performance against these requirements should warrant a Major CAR and I recommend that CAR 004 be upgraded to Major status.</p>	<p>At the time of the main assessment Coillte's SOPs had not been fully revised or 'rolled-out' to staff and contractors. However SOPs were in draft form and roll-out and training was imminent. The potential for unnecessary impacts is acknowledged and Coillte has subsequently been asked to implement additional staff and contractor training and to increase management supervision to ensure the requirements of the standard, the Irish Guidelines and Code of Best Forest Practice and Coillte's own SOPs are fully complied with.</p>
<p>The evidence presented in the report on Coillte's unsystematic approach to restoring and managing key habitats that were afforested but still retain their ecological characteristics or have a high potential for restoration. The current Minor CAR 008 does not adequately reflect the relative importance (and in some situations urgency) of restoring non-forest habitats. I therefore recommend that Minor CAR 008 should be upgraded to Major status.</p>	<p>CAR 008 was issued at minor level due to the fact that although unsystematic, plans were available for some areas. In addition the means through which areas of importance for biodiversity and conservation should be identified has been included in Major CAR 05. This requires that all areas of biodiversity value are identified and potentially damaging operations prohibited until either a management plan has been drawn up or the proposals have been ratified by the regional environment team officer. CAR 008 relates to the preparation of management planning documentation for the managing key habitats that were afforested but still retain their ecological characteristics or have a high potential for restoration. Areas are being prioritised for amended management regimes or restoration.</p>

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<p>The draft report indicates that forest on old woodland sites is a scarce habitat in the Republic of Ireland and also that Coillte has committed to developing a biodiversity action planning process for its estate. I therefore recommend that close out for Major CAR 018 should also include a commitment to prepare a Habitat Action Plan for semi-natural woodland on the Coillte estate.</p>	<p>The corrective action being carried out by Coillte follows a similar pattern to HAP preparation. The corrective action is requiring Coillte to identify, survey and prepare management plans for these areas. The process of completing surveys will take some time to complete but is the necessary first step in identifying what Coillte has in its estate. Once this has been done the identification of regional and national strategies in terms of habitats and preparing management plans will be carried out.</p>
<p>The assessment team raised Minor CAR 017 because not all semi-natural woodlands were covered by specific management prescriptions to maintain or enhance their ecological and other values. I agree that a Minor CAR was appropriate in this instance. It is of some concern that semi-natural woodlands are managed by default through non-intervention without adequate consideration as to whether this is the most appropriate action. I would argue that unplanned or incidental non-intervention might reasonably be described as neglect in some situations. This should be an important concern to the applicants, not least due to the scarcity of semi-natural woodland in the Republic of Ireland.</p>	<p>This issue is similar to CAR 008, in the division of corrective action between CAR 005 and CAR 017. CAR 005 requires that areas such as semi-natural woodlands are identified and potentially damaging operations prohibited until adequate management plans can be prepared. CAR 005 has, as a Major CAR required this process of identification to be carried out rapidly. The process of preparing management plans will take somewhat longer, and areas are being prioritised for management plan preparation and management works in line with site fragility and importance.</p>
<p>The draft certification report highlights a commitment from Coillte to develop a biodiversity action planning process for its estate. This is commendable and very welcome. The development of effective biodiversity action planning by Coillte would go a significant way to ensuring a higher degree of compliance with the requirements of certification linked with protection and management of biodiversity. It is worth noting however that currently there is no specific reference made to Coillte developing Species Action Plans for species associated with plantation forests, semi-natural and other forests and open habitats that occur within open spaces that occur within open spaces in forests. It would therefore be very helpful to see a</p>	<p>The Research Branch have as part of the corrective action for CAR 005 initiated the gathering of information of specific habitats and species on Coillte land, including plantation, semi-natural and other forests and open habitats. One of the elements of this was the preparation of a list of rare and vulnerable species and habitats of special relevance. This work has been completed. The next stages are the identification of key habitats and species. This is being carried out in two stages: the listing of potential areas by Coillte staff (following training) and the ecological survey by specialists to prioritise areas. This work is in the early stages and only once further advanced and the actual state of play known could commitments such as SAPs and HAPs</p>

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clearer commitment to the development of both HAPs and SAPs within the close-out recommendations in connection to Major CAR 005.	be advanced. Additional corrective actions have been set out by Coillte which include the public commitment to prepare action plans for habitats and species for which Coillte has a particular responsibility.
There is no indication that too little time was spend but clarity in the amount of time in the field may be helpful.	The main assessment consisted of: 12 days x 3 team members 3 days x 4 team members 4 days x 5 team members. Follow up visits: 8 days x 2 team members 1 day x 3 team members Total: 87 team member days
<p>The team has picked up on the overall weakness in the Coillte stakeholder consultation process but it does not make clear what the social objectives of management are:</p> <ul style="list-style-type: none"> • None of the objectives are stated as environmental stewardship for the future or social benefit, and neither are these covered in any of the functional teams. Where does responsibility lie? • In the corporate plan the list of contents mentions no targets under social and other outputs. CAR 16 calls for monitoring of social objectives and targets but it is not made clear what these are 	<p>Team 4 will take a lead on consultation and general public issues, however the responsibility to ensure all operations meet the requirements of Coillte's <i>Framework For Sustainable Forest Management</i> lie with the Team Leaders and the individual Regional Managers.</p> <p>Social targets are contained within Coillte's <i>Framework For Sustainable Forest Management</i>. These include:</p> <ul style="list-style-type: none"> • Economic contribution • Employment opportunities • Health and Safety • Training • Archaeology • Landscapes • Recreation • Education and research • Stakeholders <p>Individual targets are included within the business plans for Coillte Forests, the regions and the FMUs.</p> <p>In response to CAR 02 a new post dealing with coordinating stakeholder</p>
<ul style="list-style-type: none"> • The response to CAR 2 states there is now a member of staff 	

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<p>with responsibility for managing stakeholders. Is this regionally or nationally? Is there clearly defined responsibility within each FMU?</p>	<p>consultation at a national level has been created within Coillte. However, within each region responsibility lies with team 4 members and the regional manager.</p>
<p>What percentage of timber sales are classified as small sales (< 50 m³)?</p>	<p>For the year 2000 a total of 1,848,000 m³ was sold to the sawmill sector. Of this 8% was sold through local sales (as opposed to the electronic auction). This consisted of 2471 local sales with an average sale volume of 59 m³. A total of 1670 sales were for volumes under 50 m³. This accounts for 2% of the total volume sold.</p>
<p>Can an indication be given of how important Coillte is in the overall economy in the areas it is working most intensively?</p>	<p>Coillte's overall direct expenditure has been estimated at IR£56,014,000 (1998). This ranges from IR£7.5 million in Eastern Region to IR£12.1 million in Mid-Southern Region.</p>
<p>Does Coillte have a specific policy towards travellers or gypsy rights?</p>	<p>The travelling community has no legal or other rights on Coillte lands other than those enjoyed by the general public. All of Coillte lands have been purchased or leased from private owners and any rights associated are these are of the vendor or of the local settled communities.</p>
<p>At Monivea there had been little consideration of the needs of the wider community but no CAR was raised.</p>	<p>This issue has been included in CAR 002 dealing with Coillte's performance on consultation.</p>
<p>What steps have been taken to ensure the public know FMU plans are available?</p>	<p>Newspaper advertisements have been placed in local newspapers inviting attendance to FMU planning meetings during the plan preparation phase. Coillte is preparing a web-site which will include maps of FMUs and links to plan details. The first of these is now available. Comments can be made on these plans via email. Copies of FMU plans are available on request to local Coillte offices.</p>
<p>How much research is being commissioned on the social aspects of management?</p>	<p>A major study on various aspects of forestry as it relates to agriculture and rural communities was undertaken by the Economic and Social Research Institute (ESRI) for the Forest Service, Coillte and the Irish Timber Growers Association. This study was funded by the Dept. of Agriculture, Food and Forestry and Coillte. Reports published in 1993 as a result of the study are listed</p>

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	<p>below:</p> <ul style="list-style-type: none"> • <i>The Impact of Forestry on Rural communities</i> B. Kearney and R. O'Connor • <i>Factors Affecting Land Availability for Afforestation</i> D.F. Hannan and P. Commins • <i>Agricultural and Forestry Land Prices in Ireland</i> R. O'Connor and F. Conlon • <i>Policy Challenges in Forestry</i> B. Kearney, D. Hannan, R. O'Connor and P. Commins <p><i>Income Trends and Policy Development in Agriculture and their Implications for Coillte Land Acquisition and Forestry Policy.</i> 1996. Brendan Kearney.</p> <p><i>A Survey of Irish Attitudes to Forests and Forestry</i> A study, undertaken in 1999 by Lansdowne Market Research and commissioned by the Irish Forest Industry Chain (IFIC) under the then chairmanship of Dermot O'Brien, General Manager of Coillte. Coillte are a major financial sponsor of IFIC.</p> <p><i>The Knowledge and Awareness of Farmers who Planted Trees with a Random Sample from the General Population.</i> A study currently being undertaken by John McLoughlin (Chief Environmental Officer) and the Forestry Dept. University College Dublin and fully funded by Coillte.</p> <p><i>The Evaluation and Location of the Economic Impact of Coillte Owned Forests located in the Ballyvourney Area in Co. Cork.</i> Study undertaken in 1998 by Tim Crowley, Regional Manager in conjunction with University College Dublin. The aim of the study was to identify and evaluate the economic activity generated from Coillte's forests on a locality. The project was fully funded by Coillte.</p> <p><i>Forestry and Local Development: an Action Plan for East Clare.</i> This study was undertaken in 1999 by the International Centre for Development Studies, University College Galway on behalf of a local organisation - Rural Resource Development - and part</p>
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	<p>funded by Coillte. Arising from the study the following was developed: <i>Proposal for the Establishment of a Forestry Development Centre in East Clare</i> which has been submitted to the Forest Service for part funding. Coillte will also part fund if the project is approved.</p> <p><i>Development of a Community based Strategy for the Forest and Timber Industry in Co. Wicklow.</i> This study is currently being undertaken by the Wicklow Uplands Council, a grass-roots community and voluntary organisation which takes a partnership approach to sustainable development. The study aims to survey and assess community attitudes on strategic issues, examine public perception of forestry and identify method by which a forest and timber culture can be further fostered in Co. Wicklow. The study is being part funded by Coillte and the Forest Service.</p> <p><i>SRUNA Project (Sustainable Recreational Use of Natural Assets)- Carrickgollogan Wood.</i> This project, initiated in 1999, involves a new approach to planning and is designed to help local communities become more aware of the need to have sustainable planning and management of natural assets in their localities. Project team include Coillte, the local community and local organisations. Funding is being provided by Coillte and the EU/Terra Programme.</p> <p>In addition there have been a number of studies carried out by post graduate students on social aspects of forestry or forestry related issues. While Coillte did not commission or part fund this research it did, however, facilitate these studies through the provision of information/data and guidance.</p>
How is distribution and uptake of "Discovering Irelands' Woodlands" etc monitored?	<p>This publication is distributed through:</p> <ul style="list-style-type: none"> • Easons Booksellers, one of the main bookstores in Ireland with branches located in the major cities. • Regional Tourist Offices • Forest Parks • Requests to HQ and other offices. <p>Monitoring of the uptake of this</p>

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	publication and other leaflets etc. is through sales or re-order figures.
Is there a statement on Coillte policy towards archaeology?	Published policy on archaeology at present is brief and is stated on page 49 of Coillte Forests – a Vital Resource. <i>“As part of our SFM Initiative we will preserve archaeological sites and monuments”</i> . Coillte policy is protection of monuments and have been following the Forest Service guidelines on Archaeology in this regard. There is a recognition that more needs to be done in this area and the Environmental Officer in the West of Ireland, who is a professionally trained Archaeologist, was reassigned to work full time as the Company Archaeologist from 1st January this year. Part of his duties is to develop appropriate policies and practices for the company. Other duties include liaising with Statutory Bodies, interested individuals and organisations etc. on archaeological issues as well as raising awareness among staff and contractors.
Regarding spraying of chemicals – how does Coillte handle consultation before the operation now?	Spraying is now seen as a high impact operation and therefore requires special efforts to be made in relation to notification and consultation. This requirement is now included in amended SOPs.
There is no indication that staff in general are getting any training on consultation, participatory management or conflict resolution.	The Stakeholder Consultation Code of Best Practice was released in November 2000. This contains details of how Coillte staff should conduct consultation in situations such as telephone conversations, formal meetings, presentations etc. This has been distributed among Coillte staff and has been rolled-out through Regional and team briefing sessions. In addition, as part of the response to CAR 02, Coillte plans to implement a Consensus and Conflict Resolution course for 20 key staff directly involved in local consultation and develop training courses other staff involved in consultation meetings.

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8. STRENGTHS AND WEAKNESSES

8.1. Strengths

The main strengths of Coillte Teoranta are:

- The management structure is fairly flat and lines of communication are short and responsibilities identified. Coillte is an objectives driven organisation and can react rapidly and adapt to changes in management objectives.
- Staff have a professional attitude, are aware of corporate aims and are focused on achievement of these.
- The geographic information and management information systems are fully integrated into management functions and are well understood and utilised by staff.
- Training system is well developed and able to react quickly to training needs.

8.2. Weaknesses

Ten Major and nine Minor Corrective Action Requests (CARs), as described below, were raised. In the following table the requirement number refers to the indicator used in the QUALIFOR Programme to test each criterion from either the FSC P&C.

CAR No	QUALIFOR requirement (FSC P&C)	Description
1.	1.B.1 (1.6)	Minor No publicly available commitment to adhere to FSC P&C.
2.	4E1, 4F1 (4.5, 4.6)	Major Consultation is not carried out in a proactive or systematic manner, nor is it implemented equally throughout Coillte. In particular, evidence of adequate, constructive responses to issues raised by the public is not available for all cases.
3.	5.E.5 (5.6)	Major While some restructuring is ongoing this is limited in extent and is not being carried out in a systematic planned manner. Forests are being dealt with in a coupe or piece meal basis rather than as an entire forest as a whole.
4	6.A.1, 6.A.2, 5.A.1 (5.1, 6.1)	Minor Adequate assessments of impacts at strategic and tactical levels are not always carried out prior to commencement of works.
5	6.B.1, 6.D.1 (6.2, 6.4)	Major There is no overall strategy in place to ensure that features with biodiversity value are protected and that 15% of the forest area is managed as conservation areas and long-term retentions. Current policy does not ensure these requirements are met, nor are they being implemented under current planning.

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CAR No	QUALIFOR requirement (FSC P&C)	Description
6	6.B.2 (6.2)	Minor While good deer management plans are available in the areas of greatest deer pressure in the south east, documented deer management plans identifying management objectives and means of achieving them are not available in all regions.
7	6.B.5 (6.2)	Minor Where game species are shot under licences or leases an appraisal of local abundance of target species and the setting of an appropriate cull level was not always being carried out.
8	10.C.1/10.C.2 (10.5)	Minor Where valuable habitats have been colonised or planted but still retain valuable ecological characteristics these should be restored or treated in a manner that does not lead to further loss of value. While some areas have been identified this has not always been carried out in a systematic manner and proposals for subsequent treatment of such areas are not always available.
9	6.D.2 (6.4)	Major While deadwood habitats are in existence in some forests this is not through any planned process and therefore at risk from felling or restructuring operations. Regional and FMU plans did not adequately address the need to provide deadwood habitats across the estate either geographically (for example small scattered forest blocks) or within different forest types (for example high production conifer plantations).
10	6.E.3 (10.6)	Major It is not clear from current policy and practice that there is a commitment at national, regional or FMU level to achieve any increase in the use of alternatives to clearfell in the long term.
11	6.E.4 (6.4)	Minor Extended coupe sizes greater than 25 ha are evident in areas not justified through landscape or design reasons.
12	6.F.1/3 (6.6)	Major Chemical strategies were not complete for all FMUs and did not adequately identify specific means of reducing chemical use. Within some reduction strategies the information provided on chemical use was inadequately detailed.
13	6.F.7 (6.7)	Minor Surplus chemicals and containers are not always disposed of in an appropriate manner.
14	6.F.8 (6.6)	Minor Current Coillte policy and practice does not ensure that biodegradable lubricants are used where suitable.
15	7.A.1/2 (7.1)	Major Adequate management planning documentation is not available for all FMUs. Where management planning documentation was available this did not meet the requirements of the standard. In particular management

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CAR No	QUALIFOR requirement (FSC P&C)	Description
		objectives for social and environmental long term objectives and strategies to deliver these were not adequate.
16	8.A.2/3 (8.1/2)	Major While a wide range of monitoring activities are carried out throughout the regions, this is generally restricted to forest management and silvicultural activities. Monitoring of social and environmental parameters are less well established, are insufficient to demonstrate compliance with the standard and do not always adequately address the particular issues of the FMU.
17	9.B.1 (9.1)	Minor Not all semi-natural woodlands are covered by specific management prescriptions which will maintain or enhance their attributes.
18	9.B.2 (10.5)	Major While on a limited number of sites plantations on former semi-natural woodland sites are managed in a manner which retains and enhances their semi-natural characteristics there has been no systematic implementation of this across all regions.
19	10.B.1 (10.4)	Major Not all FMUs currently meet the minimum percentage requirements and do not adequately detail how these percentages will be achieved in the future. Additionally within the selection of species the process is skewed towards consideration of management objectives through the issuance of pre-set targets or limits rather than through an open appraisal which takes due consideration of the capability of the site.

9. CLOSE-OUT DETAILS FOR MAJOR CARs

A series of meetings between Coillte and SGS QUALIFOR were convened following the completion of the main assessment in August 2000. The following is a summary of the actions and timeframes proposed by Coillte in October 2000 to address the Major CARs. Full details of the Corrective Action Programme for both Major and Minor CARs is given in Appendix IV of the full report.

CAR No	Corrective action	Timeframe
2	<ol style="list-style-type: none"> 1. Publish commitment to consultation with stakeholders 2. Appoint full time staff member with responsibility for managing stakeholder relations process 3. Prepare FMU and forest design plans as basis for consultation 	<ol style="list-style-type: none"> 1. Done 2. Done 3. Revise current draft plans by end Sept 2000; First drafts of remaining plans by June

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CAR No	Corrective action	Timeframe
	<ul style="list-style-type: none"> 4. Prepare best practice manual on stakeholder consultation 5. Include requirement to conduct FMU consultation in business plan guidelines 6. Implement uniform approach for consultation on high impact operations 7. Establish social and environmental panel in each region 8. Prepare summary of information available to stakeholders 9. Implement complaints register 10. Implement Consensus & Conflict Resolution training for key staff. 11. Implement training for all Team 4 staff on holding consultation meetings. 	<p style="text-align: center;">2001</p> <ul style="list-style-type: none"> 4. Done; to be revised after Oct 2000 5. Done 6. First round of FMU plans by Nov 2000; others by end 01 by end Jan 2001 7. 8. 30/11/00 9. 30/11/00 10. 30/09/01 11. 31/12/01
3	<ul style="list-style-type: none"> 1. Establish Landscape Working Group 2. Identify blocks for restructuring 3. Complete landscape sensitivity analysis 4. Prioritise blocks for restructuring 5. Draft guidance documentation for landscape design teams 6. Develop and implement restructuring plans 	<ul style="list-style-type: none"> 1. Done 2. Oct 2000 3. Oct 2000 4. Oct 2000 5. Oct 2000 6. Nov 2000 – Dec 2001
5	<p>Element 1; protection of small features of biodiversity value</p> <ul style="list-style-type: none"> 1. Draw up list of small features of biodiversity value 2. Staff training –identification and recording of features, field ecology 3. Begin systematic recording of agreed features across estate 4. Begin process of protecting small features/ habitats 	<ul style="list-style-type: none"> 1. Mid Oct 2000 2. End March 2001; develop annual Forest Ecology Course, beginning Apr. 2001 3. June 2001 4. From June 2001
5	<p>Element 2: Set aside 15% of estate where biodiversity is primary management objective</p> <ul style="list-style-type: none"> 1. Finalise potential biodiversity areas for FMUs and prepare MIS to exclude these from operations 2. Survey potential areas and write management plans 3. Commence conservation projects in properties known to be of conservation value 	<ul style="list-style-type: none"> 1. 3 FMUs per region by end of Dec 2000; remaining FMUs by Apr 2001 2. Sept 2000 to Dec 2005 3. Jan 2001
5	<p>Element 3: Review rare and vulnerable habitats and species; develop and implement management plans</p> <ul style="list-style-type: none"> 1. Draw up list of rare and vulnerable species and habitats for which Coillte has special responsibility; review Annex I habitats and Annex II species on EU Habitats Directive 2. Consolidate links with NGOs and others involved in biological recording 3. Post notice of programme on website 	<ul style="list-style-type: none"> 1. June 2001 2. Begin Sept 2000, review progress mid-2001 3. June 2001

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CAR No	Corrective action	Timeframe
	<ol style="list-style-type: none"> 4. Revise inventory Code of Practice and incorporate recording of habitats and species into MIS 5. Consult with Duchas and NGOs on immediate steps to be taken, with focus on specific sites and measures to be undertaken 6. Review current operational plans for sites identified; review in light of conservation requirements and determine cost implications 7. Consult Duchas again and develop management plans for habitats and species 8. Review progress on species and habitat management plans and develop timetables for outstanding plans 	<ol style="list-style-type: none"> 4. June 2001 5. Sept 2001 6. Oct 2001 7. Start Nov 2001 8. Nov 2002
9	<ol style="list-style-type: none"> 1. Prepare methodology for measuring deadwood 2. Train staff and revise inventory Code of Practice 3. Deadwood provisions to be specified in site specific management plans for biodiversity areas 4. All operational sites to meet minimum deadwood requirements 	<ol style="list-style-type: none"> 1. Done 2. End March 2001 3. Sept 2000 to Dec 2005 4. Implement from Apr 2001
10	<ol style="list-style-type: none"> 1. Establish Lower Impact Silvicultural Systems Working Group 2. Draw up preliminary list of suitable stands and select demonstration areas and prepare management plans for these areas 3. Develop research project for evaluation of LISS 4. Training programme for LISS Working Group 5. Begin harvest of demonstration areas 6. Monitor crop and regeneration condition 	<ol style="list-style-type: none"> 1. early Oct 2000 2. mid Oct 2000 3. Nov 2000 4. Nov 2000 5. March 2001 6. annually
12	<ol style="list-style-type: none"> 1. Records of past chemical use to be collated by region and FMU 2. Prepare regional strategies 3. Revise SOP to be in line with strategy 4. Training for establishment managers 5. Monitoring and analysis of progress by Chemical Practice Group and Pesticide Committee 	<ol style="list-style-type: none"> 1. Nov 2000 2. Dec 2000 3. Dec 2000 4. Dec 2000 onward 5. Dec 2001
15	<ol style="list-style-type: none"> 1. Complete 2nd draft of 16 FMU plans and prepare for consultation 2. Following consultation amend plans 3. Make final plans publicly available 4. Establish contingency plans for high impact operations in remaining FMUs 5. Complete 1st draft of remaining 21 FMU plans 6. Consult on remaining plans and amend as necessary 7. Make final plans publicly available 	<ol style="list-style-type: none"> 1. End Sept 2000 2. Nov 2000 3. March 2001 4. Oct 2000 5. June 2001 6. Oct 2001 7. Dec 2001
16	<p>To meet the requirements of the standard two levels of monitoring of environmental and social parameters will take place in FMUs</p> <ul style="list-style-type: none"> • Environmental monitoring of forest operations at site level through the procedures outlined in the SOPs. Details to be recorded in site files • Monitoring the progress at FMU level of 	<p>Quarterly performance reviews of annual programmes to include monitoring of progress with economic, environmental and social objectives and targets.</p>

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CAR No	Corrective action	Timeframe
	environmental and social objectives and targets against planned suite of parameters	
18	<ol style="list-style-type: none"> 1. Desktop review Old Woodland Sites on Coillte estate and store information on GIS 2. Survey OWSs to assess conservation value, restoration potential and location of features to be retained and enhanced. OWSs to be given priority attention in FMU surveys. 	<ol style="list-style-type: none"> 1. Sept 2000 - March 2001 2. Sept 2000 – Dec 2005
19	<ol style="list-style-type: none"> 1. Establish Species Diversification Group 2. Determine existing species composition for all FMUs 3. Prepare felling plans for each FMU (2001-05) as part of restructuring and/or FMU planning process 4. Develop guidelines on species selection 5. Complete species selection plans for FMU plans 6. Determine likely species composition for each FMU in 2006 7. Ensure workplan guidelines for 2002 on species selection address variance with standard 	<ol style="list-style-type: none"> 1. Done 2. October 2000 3. Oct 2000 4. Sept 2000 5. Dec 2000 6. Dec 2000 7. June 2001

Following corrective action taken by Coillte Major CARs 03, 09, 10, 12 and 18 were been downgraded to Minor status in December 2000. Two additional field visits were carried out in March and April 2001 to review progress on implementing corrective action on the outstanding Major CARs 02, 05, 15, 16 and 19. Implementation of corrective action plans for Major CARs 02, 15, 16 and 19 was sufficiently advanced to warrant downgrading to Minor status in April 2001. Coillte was asked to amend the corrective action plan for CAR 05 to include further training for and supervision of staff and contractors. This amended corrective action plan (Appendix IV) was accepted and subsequently Major CAR 05 was downgraded to Minor status in May 2001.

10. CERTIFICATION RECOMMENDATION

The outstanding Minor Corrective Action Requests do not preclude certification, but Coillte Teoranta would be required to take the agreed actions following certificate issue. These will be verified by SGS QUALIFOR at the first surveillance to be carried out about 6 months from the date of the issuance of the certificate. If satisfactory actions have been taken the CARs will be 'closed out'; otherwise Minor CARs will be raised to Major CARs. There being no Major Corrective Action Requests outstanding, the assessment team recommends certification of Coillte Teoranta's forest management of plantation and semi-natural forests in Ireland.

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	Sophie Higman
Date:	24 May 2001