Implementation of the Mackinnon Report

Advice to the Minister of State for Land Use and Biodiversity on improving the delivery of forestry licensing processes

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Executive Summary

1. This report contains advice to the Minister on the implementation of the 'ways forward' proposed by Jim Mackinnon in his review of forestry licences completed in November 2019. Due to the pandemic, this work was undertaken remotely – primarily through interviews with stakeholders from the Forestry Policy Group (FPG) and staff within DAFM.

2. Subsequent to the publication of the report, and throughout the first half of 2020 there was a significant increase in appeals against licensing decisions and declining confidence within the forestry sector. The resulting further delays in processing felling licences in particular led to serious threats to business continuity along the supply chain to timber processors, which only started to be mitigated by the end of 2020. (Section 2)

3. Support within the forestry sector for the recommendations in the Mackinnon report has grown over the past year. Awareness of the report and its implementation amongst other stakeholders is much lower and support more nuanced, however discussions with stakeholder representatives from across the Forestry Policy Group suggest broad-based support and no fundamental disagreement with the proposals. Stakeholders placed particular emphasis on the recommendations relating to the backlog(s), national strategy, land availability, the impacts of European legislation and pre-application discussions (Section 2)

4. Some notable progress with implementation has been undertaken by DAFM and the incoming administration. In particular the impressively swift legislative changes, the substantial increase in specialist staff resources and the strengthening of the Forestry Appeals Committee. (Section 2)

5. The pace and progress seen on legislation and resourcing has not been matched for other recommendations. This is partly explained by the protracted election process and pressures on DAFM resources arising from Brexit and Covid, but also due to failures in departmental project management and communications, as well as poor dialogue and relationship-building between stakeholder groups. (Section 2)

6. DAFM now needs to act swiftly to address weaknesses in project management and communications, establishing a clear pathway to delivery of the Mackinnon recommendations. This should be delivered through a project with particular clarity around scope; accountability and governance; objectives; deliverables, and monitoring and reporting. (Section 3)

7. The project should be structured to address the breadth of the Mackinnon recommendations and to improve communications. It is therefore recommended that it is managed as 4 workstreams covering: the backlogs; strategy and national approach; licensing processes and organisational development within DAFM. Each workstream should include an appropriate working group, including members from beyond the forestry teams in DAFM. Detailed outlines of the recommended content and outputs from each of these workstreams is covered in section 4

8. The legal issues impacting this work are complex and are impacted by domestic and European legislation, as well as recent case-law. The significance of these issues is not widely and consistently understood by stakeholders. Whilst it is not within the scope of this report to comment on legal matters, it is clear that better communications and discussion of the reality of extant legal constraints would help stakeholders to engage with the process more effectively. (Workstream 4)

9. The lack of dialogue between different stakeholder groups is particularly notable. The government's ability to improve this is limited, and it will require action by the stakeholders themselves to improve engagement. The establishment of the FPG is a welcome development to help address this, and the work to develop a national vision and strategy will help to build trust. If sustained and sustainable progress is to be made however, it is vital that these groups also find ways to engage directly with each other more effectively: to find common ground and to better understand each other's positions. (Workstream 2)

10. A number of related issues were raised by stakeholders during discussions (e.g. management of ash die-back and opportunities arising from the growth in carbon markets). Whilst these are out of the scope of this report, the Minister may wish to further consider how these are addressed either within the proposed project structure or in parallel work. (Annex 4)

22 Feb 2021

Section 1 – Background

Introduction and definitions

1. This advice was commissioned by the Minister of State for Land Use and Biodiversity in December 2020. The terms of reference are:

    - To advise the Minister on an Implementation Plan for the Mackinnon report, setting out measurable and deliverable actions and timelines for their achievement

    - To engage with all relevant stakeholders in the finalisation of this Plan

    - To submit her recommendations on an Implementation Plan to the Minister and the Forest Policy Group by end-February 2021.

2. Different groups interpret the word forestry in different ways, with some reserving it to a specific type of management for financial return, whereas others take a broader perspective incorporating all types of woodland management, including native woodland and urban forestry.

    Throughout this report, the term forestry is used in its broadest sense, and is defined as "the craft, science and practice of managing trees for a specified purpose".

Background and scope

3. Ireland has long held ambitious plans for increasing forest cover (e.g. 'Forests, products and people – Ireland's forest policy – a renewed vision', 2014) and yet planting rates have been declining steadily over the last twenty years. The pace of this decline has increased since 2014, as is seen in Fig 1.

Fig. 1 Afforestation rates in Ireland (from DAFM Afforestation Statistics 2019)
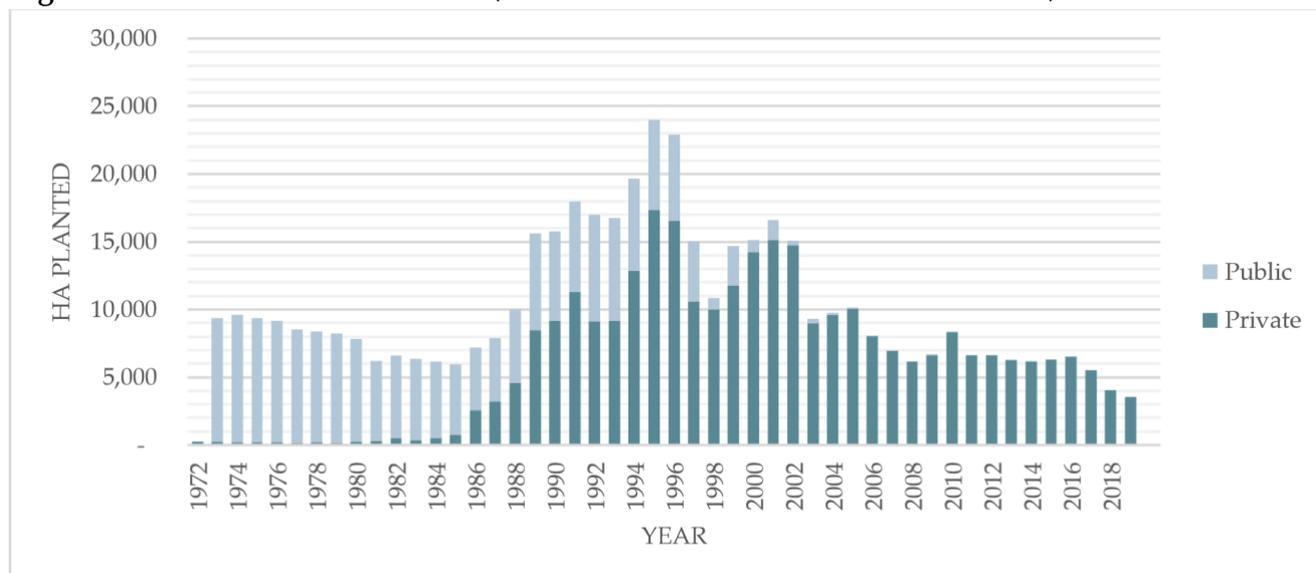
4. Jim Mackinnon was therefore commissioned in August 2019 to:

    - Examine the process for approving afforestation proposals and the linked issues for other forestry related operations

- Make recommendations which will address any issues identified and which will improve the process

5. The report of the review was completed in November 2019, and the recommendations accepted by the then Minister Doyle. Subsequently DAFM issued a draft implementation plan for consultation in January 2020. The recommendations in the Mackinnon report which form the basis for this implementation plan are included at Annex 1.

6. National and international conditions have clearly changed significantly since the publication of the initial implementation plan: with the pandemic, the establishment of a new Irish government and Brexit in particular. However, the responses to these events combined with strengthened international commitment to tackle the escalating climate and biodiversity crises, have served to reinforce the need for Ireland to do more to develop sustainable forest management to deliver environmental, economic and societal goals.

7. The current [Programme for Government](#) includes 29 individual references to forestry. This clearly demonstrates the political significance of the subject and builds on previous administrations' commitments to increase tree cover and the contribution of trees to the country's economic, environmental and social well-being. In particular, increasing emphasis is being placed on the significance of trees in combatting climate change at both the Irish and EU level (e.g. the 'Ag-Climatise' roadmap for agriculture re-states the 8,000ha annual target for new woodlands and a new EU Forest Strategy is due to be delivered soon).

8. The scope of this report therefore remains bounded to the recommendations included in the original report. Additional issues that were raised or that emerged during interviews have been included in annex 4.

Progress with the current Implementation Plan

9. Responses to the consultation on the initial implementation plan were dominated by forestry interests (seven forestry organisations, one farming organisation and 12 department personnel). No responses from environmental or community interests were received.

10. The key messages in the consultation response were:

- Support for the suggested 'ways forward' in the Mackinnon report
- The need for a much clearer plan of action (especially around the backlog and KPIs)
- Concern regarding the lack of detail, ambition or pace

11. A substantial number of people interviewed as a part of this report were unaware of the implementation plan or the consultation. This was particularly apparent amongst those who are less close to timber-producing interests. This highlights a difficulty surrounding communications and engagement which is not directly addressed in the recommendations of the Mackinnon report.

12. Clearly the plan was drafted before the pandemic hit, and as with so many things, progress has been inhibited by the wider crisis.

13. In addition to more visible political recognition of the significance of forestry, rapid action by the incoming administration has resulted in legislative amendments as recommended by Mackinnon (r20), as well as a number of key appointments within DAFM (r9). The impact of these actions is being observed at the time of writing with key indicators for 2020 as follows:

    - **Afforestation**: 4342ha approved and 2,488ha planted (provisional data) against a target of 8,000ha,

    - **Harvesting** (including thinning): approx. 5,023,366 m3 approved (target unclear but COFORD forecast of gross annual production for 2021 is approx. 4,500,000m3)

    - **Roading**: 130km approved (125km target in Climate Action Plan)

14. In the ten months following the publication of the original implementation plan, the rate of approvals for harvesting, planting and road creation in 2020 had not improved sufficiently to stabilise the sector or generate sufficient activity to meet targets. This was particularly acute for harvesting, and during the Spring and Summer of 2020 the situation developed into a full-blown crisis which threatened the ongoing operation of the forestry sector as a whole. Owners were unable to harvest their timber, and timber processors unable to access sufficient Irish timber, resorting to imports to maintain throughput. This has seriously undermined confidence right across the forest and woodland sector and has been raised several times at the Oireachtas.

15. Since November 2020, a concerted effort by DAFM and the FAC with a focus on larger approvals has mitigated the most immediate threat to the processing sector by releasing volume. As a result, there now appears to be a reasonable forward pipeline of licensed volume (provided associated road licences have been granted). As this has resulted in a greater focus on Coillte licences, many private sector growers have not seen equivalent improvements and remain deeply frustrated at the slow and uncertain rate of approval. These difficulties are also counteracting parallel efforts to promote afforestation to landowners. There are extremely high levels of dissatisfaction with the lack of approval of licenses in the private sector, and constraints on owners being able to realise the capital value of their forest assets. This is generating negative focus in the media which is further eroding interest in new planting amongst land-owners.

16. Underlying many of the current difficulties with licensing are changes to the operating and legal environment since 2012 (see Annex 3). There are currently 4 judicial reviews of FAC decisions underway, and there is significant pressure from the EU for improved environmental performance across Ireland (not just forestry-related). Whilst it is beyond the scope of this report to comment on legal matters, the lack of wider understanding (or possibly acceptance) of environmental legislation and its potential implications for the achievement of climate-change targets is clearly a source of antagonism. Sustainable improvement in the practice of forestry regulation will need better shared understanding of this issue and an improvement in how stakeholders work together.

Section 2 Review of developments since January 2020

Discussions with stakeholders

17. Thirty-six interviews were held with stakeholders from the Forestry Policy Group and DAFM staff in December and early January, to explore developments since early 2020 and to seek additional views not expressed during the consultation process. The purpose of the discussions was NOT to repeat the process carried out by Jim Mackinnon, but to ascertain whether other significant issues had arisen since November 2019 which would impact on the findings. Key messages from these stakeholders in relation to Mackinnon were:

    • The recommendations in the original report are still appropriate (if not more so)

    • The awareness of the Mackinnon report and its implementation is much higher amongst stakeholders with an interest in commercial forestry

    • Internal and external communications by DAFM are not working well – including between the department and other parts of the public sector.

    • Engagement between different stakeholder groups is not functioning well, with social media and newspaper articles apparently the main basis for 'dialogue'. This is exacerbating the existing low levels of trust between stakeholders. Individual organisations all expressed a desire for constructive engagement.

    • Confidence across the sector – but particularly amongst farmers and environmental stakeholders – has been declining for several years and has dropped further since the report was written. There are a number of reasons suggested for this including: the lack of the 'low-hanging fruit' of attractive, uncontentious sites for planting; no broadly-understood rationale for current regulatory processes; concerns that commercial operators do not respect environmental values and boundaries; concerns that eNGOs wish to halt all non-native forestry in Ireland and finally that DAFM is unable to regulate effectively, and that the government as a whole is not consistent in its view of status of forestry in comparison with other land uses.

18. Amongst these discussions, the following recommendations were highlighted the most frequently or with the greatest emphasis:

Recommendation 2 – reduce the backlog

19. For those with a stake in the growing of trees for timber, this is the single most important recommendation. The failure to provide any level of confidence in the timeframe for the issuing of planting, roading or harvesting licences has had a significant impact on landowners' views on forestry. There is only a partial comparison with Scotland in this regard, where felling or roading licences were neither particularly contentious nor in the scope of the review carried out there (other than generically with Environmental Impact Assessment procedures). The Department has been right to focus resources primarily on this recommendation, and improved performance of the FAC and in felling approvals is noted, however there has been little visible progress in addressing the difficulties with afforestation approval.

Recommendation 12 – develop a forestry strategy for Ireland

20. This was the issue raised by the most stakeholders from across the spectrum of interests. In spite of numerous public statements of ambitious forestry and planting targets in the last decade, it would appear that these are not embedded and shared and have failed to galvanise the requisite public support and collaborative action across multiple actors. The significance and importance of this recommendation therefore appears to be understated in the original report.

Recommendation 21 – conduct pilot studies on land availability

21. This was raised extensively by stakeholders across the spectrum, with a wide breadth of views which ranged from 'there is a large excess of land suitable for trees' to 'compliance with the EU directives means that we have insufficient land to meet our targets'. Amongst the concerns raised, there was particular confusion about the rules relating to unenclosed land and the suitability of land for different types of forestry – beyond timber production.

Recommendations 6&7 – clarify the situation with regards to European Directives and forestry operations in Ireland

22. Stakeholders *from across the spectrum* are not fully persuaded that the current interpretations of the European Directives as they apply to forestry are correct - but for a range of different reasons. A common complaint is that the 2012 update of domestic legislation did not adequately take into account the advice provided by a number of bodies, however it is noted that this is a common in drafting legislation. In addition, many stakeholders believe that the legislation could be applied more efficiently, although it is not clear that this is belief is based on a solid understanding of current EU requirements.

Recommendation 3 – Introduce pre-application discussions with Issues / Action log

23. A broad range of stakeholders (including many DAFM staff) support this recommendation. Concerns were raised about significant resource implications if preapplication discussions were compulsory and site-based, however the potential benefits of reducing the number of unsuitable or poor applications were seen to be considerable.

Other in-scope matters raised

24. In addition to the views relating to the Mackinnon recommendations, a number of other common themes emerged that are pertinent to future forestry policies in Ireland and have a bearing on the recommended approach to the implementation outlined below. These are:

European and International perspectives

25. There are a number of European aspects beyond the Natura and Water Framework Directives that have a direct relevance to this work. These are mostly beyond the scope of this report, however the development of new European biodiversity and forestry strategies; the rules associated with the new CAP and any further climate change and biodiversity commitments under the Green New Deal must be borne in mind as future policies, initiatives and regulations are developed. In addition, the postponed Biodiversity and Climate COP meetings are likely to stimulate further focus on forests and forestry.

Leadership, partnership and engagement

26. Clear leadership to weave the various interests together into a single narrative has been missing. This is partly to do with the lack of a shared national narrative and strategy (r12) with buy-in from across the stakeholder community, but also the complex ecosystem of public / publicly funded / private and 3rd sector interests. Scotland has a slightly longer history of widespread afforestation, and also had the Forestry Commission as a legacy body to fulfil the leadership and convening roles – with the latter coming increasingly to the fore as the whole sector matured over the last 20 years or so. The expectation from some stakeholders that DAFM is responsible for delivering this does not appear to match with the Department's current role.

27. The boundaries between the roles of the core department, Teagasc and Coford are somewhat opaque. There was a commonly held view that Coillte has considerable potential to do more to provide leadership more generally for forestry, and to promote itself as an exemplar of modern multi-purpose sustainable forest management. However, it is also important to note that concerns were also raised about unfair competition between Coillte and the private sector and an over emphasis on single purpose 'industrial' forestry with Coillte.

Farmer / land-owner perspectives

28. A number of interviewees felt that the viewpoints of the land-owners most likely to deliver afforestation (i.e. farmers) need more consideration, and are not given due prominence by the FPG. Experience in Scotland highlighted the need to recognise the multiple facets in farming communities and to address these specifically (e.g. different views between different geographies, farm types, tenures and age groups). The role of farm advisers – both public and private sector – is crucial in this regard, and there is a clear appetite for further engagement from their representatives.

29. A number of additional related but out of scope issues were raised by stakeholders. These are included in Annex 4 for information.

Section 3 - Development of the implementation plan

Approach

30. The recommendations in the Mackinnon report are wide-ranging in terms of their timescale, scope, impact and deliverability. This contrasts with the implementation plan for the Scottish report, where the 24 recommendations were mostly limited to process and cultural improvements which could be largely completed within a year. Furthermore, the Scottish implementation plan was a part of a much wider comprehensive programme of change for forestry in Scotland that covered policy, legislative and organisational aspects, as well as technical and process changes.

31. Considering these differences, learning from the Scottish approach and having listened to stakeholder feedback, my advice is to structure the implementation plan as a **defined project** with particular clarity around:
    • Scope
    • Accountability and governance
    • Objectives
    • Deliverables
    • Monitoring and reporting

32. To ensure transparency and good communication, clear project documentation following standard project management procedures (eg. Project Initiation Document, Project Plan, stakeholder engagement, milestone plan) should be completed by the Project Manager and approved by the Project Board once it is established. *This should include the deployment of suitably experienced project and change management staff to support the Project Manager.*

Scope

33. Many of the recommendations are linked or can be addressed by a single action. I therefore suggest that they are organised into four complementary workstreams to enable the work to be distributed effectively whilst maintaining coherence and enabling management oversight. The suggested allocation of recommendations to workstreams are included in Table 1 below. The table also provides a subjective assessment of how important the recommendation is (with 1 being the most important and urgent), this is based on my judgement of how fundamental the recommendation is to improving the overall performance of the approval process.

34. These workstreams are important for organising the work and engaging meaningfully with others. They should be used as a basis for building coalitions of key actors (not just DAFM staff) so that the process of forestry approvals can re-gain good levels of trust and acceptance. This need for collaborative working cannot be over-emphasised: the current situation cannot be addressed without constructive action from many stakeholders.

35. Initial deliverables and milestones are suggested for each workstream in the subsequent section. The Project Board will need agree the firm deliverables and the timing of milestones based on resource availability (in DAFM and elsewhere). I suggest the process to firm-up deliverables and milestones should take 4-6 weeks.

Table 1: Allocation of Mackinnon recommendations to proposed workstreams

Rec	Description	Workstream	Importance
2	Focus action on reducing current backlog of applications	Backlogs	1
3	Introduce pre-application discussions with Issues / Action log	Process	1
4	New requirement for Environment report supported by Planning Grant		2
5	Address problems with poor quality applications		2
6	Develop guidance on Habitats Directive as it affects licensing applications		2
7	Discuss with the EC the impact of the Directives and woodland creation to support the Climate Action Plan		2
22	Review forestry legislation		2
23	Explore potential for single consent associated with a management plan		3
20	Introduce fees for submitting applications, making submissions and lodging appeals		1
9	Recruit additional inspectors and environmental specialists	Organisational development	1
10	Introduce genuine KPIs		2
11	Develop a Customer Service Charter		2
15	Raise the status and profile of the inspectorate		2
19	Review Education and training of forestry professionals		3
16	Need for greater commitment by all to partnership working	Shared national approach	1
21	Pilot studies on land availability, including the potential for woodland creation on areas of unenclosed land		1
1	Raise the political profile and commitment to woodland creation		1
8	Revise MoUs with NPWS and NMS		2
12	Prepare a Forestry Strategy for Ireland		1
13	Ensure all State Bodies play their part in implementing the Strategy		2
14	Establish an Irish Forestry Standard		3
17	Raise awareness of value of woodland creation and a vibrant forest industry		2
18	Take stock of the multiplicity of campaigns and initiatives to promote woodland creation		2

Accountability and governance

36. As discussed above the delivery of the transformation required to deliver Irish targets would benefit from clearer accountability and leadership. Responsibility for the delivery of this implementation plan should be allocated clearly and named individuals ascribed to the various roles. A suggested structure is described in Fig 2 below. This is modified from the model used in Scotland to minimise resource allocation. The Project Manager should be supported by relevant admin, project management and communications specialist resource.

Figure 2 Proposed project governance structure
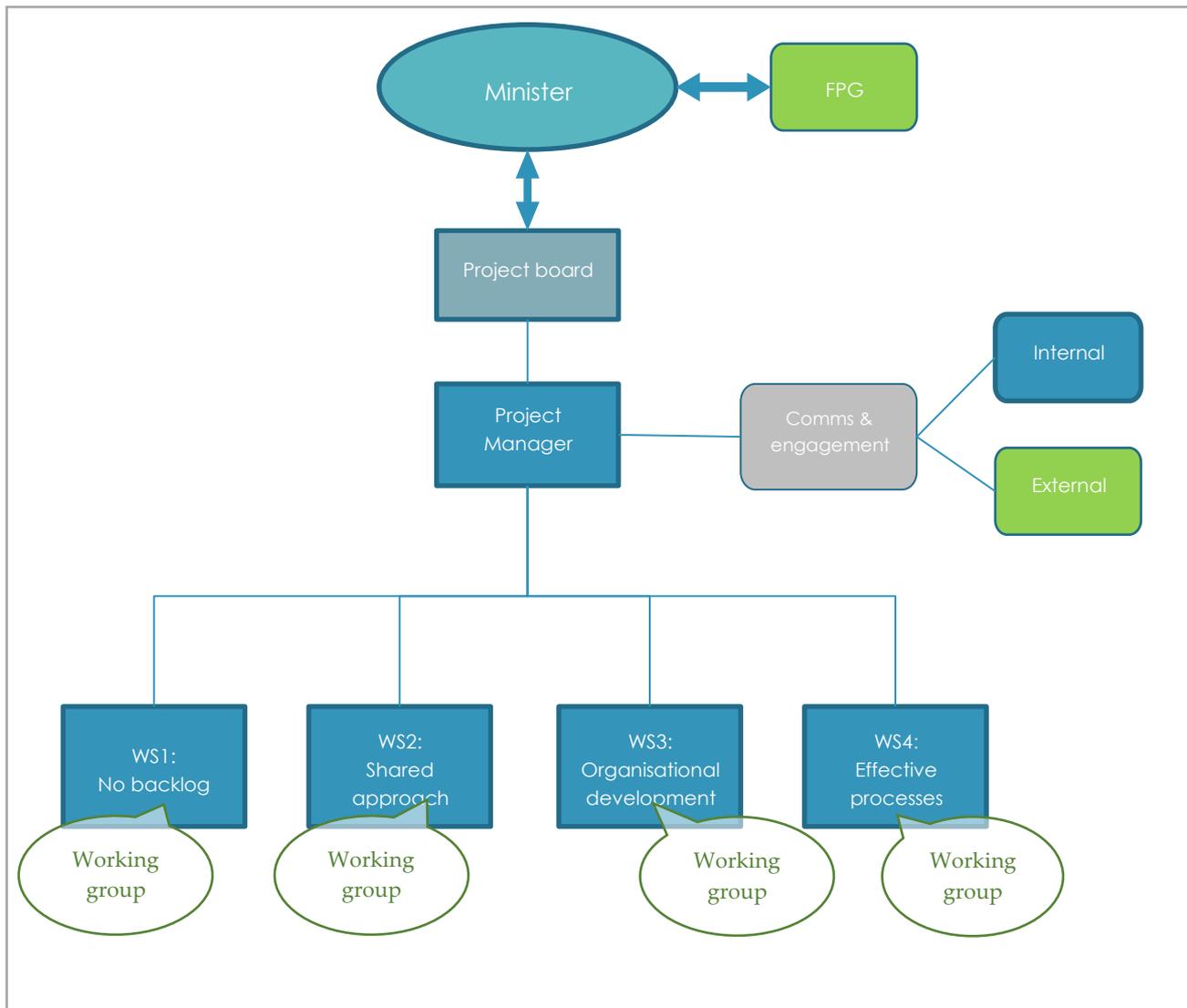
37. The **Project Board** should be chaired by the senior Project Sponsor and two or three others, including from outwith DAFM. The role of the board is to oversee delivery of the project:

- Championing the project and raising awareness at senior level.
- Approving strategies, delivery plan, project scope and milestones.
- Support the project manager and securing resources.
- Resolving strategic and policy issues and responding to major issues.
- Driving and managing change through the organisation.

- Prioritising project goals with other ongoing projects.
- Communicating with other key organisational representatives
- Overseeing risk and mitigation processes

38. As this project needs to stimulate and drive action within and beyond DAFM, it is particularly important that communications and engagement are considered at each level in the governance structure. At the **Workstream** level, working groups should be established to bring in appropriate breadth of expertise and resource from beyond the department. These are likely to include technical and customer experts drawn from the FPG members who can work with DAFM staff to develop and stress-test proposals and deliverables. At the **Project** level, the project manager needs to carefully manage the network of internal and external stakeholders to ensure that they have clear visibility of the work of the project and understand how to feed in views. At the **Ministerial** level, the Forestry Policy group (FPG) will provide a vital cross-interest reference group to monitor progress, offer advice and improve dialogue between stakeholders. Clear terms of reference will need to be provided for all groups that are established, including an update to the existing FPG terms of reference to reflect the project and other groups.

39. It may also be worth considering establishing a delivery partnership group to support the Project Board. This group would comprise of publicly funded organisations outwith DAFM who have a role to play in delivery (e.g. NPWS, EPA, Coillte).

40. The **Project Manager** has overall responsibility for co-ordinating the delivery of the project, allocating resources and overseeing risk management. The Project Manager is also responsible for overall co-ordination of internal and external communications. This role is heavily loaded and will need access to additional support (e.g. project administration, communications)

41. Each **Workstream** should have a named departmental Workstream Lead responsible for delivering the agreed tasks and outputs from each workstream and for reporting progress and issues to the Project Manager. Once leads are identified for each workstream, a set of agreed deliverables and milestones should be produced and combined into an overall project milestone plan to track progress with implementation. The cross-sector working groups for each workstream will form a vital basis for ensuring robust solutions with broad-based buy-in.

42. The following sections suggest initial deliverables and milestones for each workstream. These deliverables and milestones are suggestions which will need to be refined and dates agreed with the Project Board to reflect resource availability, critical path dependencies and operational practicalities. *It should be noted that not all deliverables and milestones will be the responsibility of DAFM, and will require action and commitment by other stakeholders if the whole project is to succeed.*

43. Detailed progress should be tracked monthly by the Project Board, quarterly updates provided to the FPG, and the whole project should undergo a rapid review after 6-8 months to ensure it is delivering the desired outcome and make any necessary changes.

Workstream 1: Reducing the backlogs

Scope

44. This workstream addresses a single recommendation – r2. It covers all applications for licences (roads, afforestation and felling) that have been in the system longer than the agreed target processing times.

Objectives

45. The objectives of this workstream are:

- To reduce the current backlogs of all types of licence in breach of agreed processing times to an acceptable level, whilst ensuring that regulatory standards are maintained.

- To ensure that any future growth of a backlog is identified and managed expeditiously.

Progress to date

46. A project is already established and is starting to make inroads into the backlog of files 'referred to ecology' for processing. Evidence indicates that whilst the growth of the backlog has been halted since the project started, the rate of progress is not sufficient to reduce the backlog quickly enough to achieve appropriate levels of approval.

47. There has been recent confusion relating to the scale of the backlog due to over-lapping definitions of different backlog categories. This should be urgently addressed by expanding the scope of this work to cover *all* delayed applications and to improve the reporting and communication of progress against clearer targets.

48. The production of the weekly dashboard has been welcomed by stakeholders; however it should be clearer and provide better information regarding progress towards the achievement of targets.

49. A number of stakeholders expressed concern that the current efforts to reduce the backlog may result in poorer decision-making in relation to the most sensitive applications. However, discussions with the FAC chair indicated that overall, the quality of applications that are being considered by FAC have improved over the last few months which may suggest that these concerns are unfounded. In spite of this reassurance, it is therefore important that in addition to speeding up the assessment process, particular care must be taken and *be seen to be applied* to sensitive cases.

Key actions

50. Clarify the definition of 'backlog' to ensure it includes *all* licensing activity and only refers to applications that are beyond the customer charter standard for approval (other metrics covered in workstream 2).

51. For each type of licence specify a target number and area for an acceptable scale of backlog (eg. backlog should be no greater than 5% of the rolling 5 year average annual total applications), then plot a credible trajectory to achieve this target. This trajectory should include transparency about the prioritisation process so that applicants get a realistic indication of likely turnaround for their application.

52. Continue with the intense activity currently underway in DAFM and address the variability in performance between different teams to improve efficiency; standardise quality assurance, and ensure that resources are sufficient and appropriately applied.

53. Ensure excellent staff and stakeholder communications to explain the basis for the calculation of the backlog and the target and update the dashboard and associated report to show weekly performance and progress.

Suggested deliverables

- Targets for backlog agreed and incorporated into the Customer Charter (WS3)

- Published process for reducing the backlog to achieve the targets including prioritisation and scheduling

- Monthly publication of the number, type and area of applications within the backlog against target trajectory

Suggested milestones (dates to be proposed by working group)

- Publication of new baseline dashboard incorporating new backlog definitions

- Sufficient harvesting licences issued to cover 18 months of predicted demand for wood processors

- Backlog of private sector harvesting licences reduced by 50% (by number)

- Backlog of each licence types reduced to levels agreed in Customer Charter

- Monthly dashboard published on website by end of the first week each month

Workstream 2: A Shared National Approach

Scope

Rec	Description	Importance
1	Raise the political profile and commitment to woodland creation	1
8	Revise MoUs with NPWS and NMS	2
12	Prepare a Forestry Strategy for Ireland	1
13	Ensure all State Bodies play their part in implementing the Strategy	2
14	Establish an Irish Forestry Standard	3
16	Need for greater commitment by all to partnership working	1
17	Raise awareness of value of woodland creation and a vibrant forest industry	2
18	Take stock of the multiplicity of campaigns and initiatives to promote woodland creation	2
21	Pilot studies on land availability, including the potential for woodland creation on areas of unenclosed land	1

Objectives

54. The lack of a shared national view of what Ireland wants from her trees, woods and forests is fundamental to resolving the current challenge. Many stakeholders spoke of conflicting policies – particularly environmental, climate, agriculture and forestry. This is not uncommon internationally, however, given the very young and rapidly changing nature of Ireland's forest and woodland 'sector' it is a particularly important gap that needs to be closed.

55. The national imperative to increase tree cover and the production of wood-based products does not appear to be widely ingrained - even across government – with many stakeholders pointing out historically conflicting policy agendas, and an over-association of DAFM and Coillte with commercial forestry (although there was widespread praise for the recent Coillte Nature initiative).

56. The development of a shared national approach extends well beyond the government. Engagement between stakeholder groups appears under-developed compared with other sectors in Ireland (e.g. dairy), and compared with the forestry sector in Scotland. Improving the relatively weak engagement of the forestry sector with other stakeholders (and vice versa) is therefore necessary and should be strongly encouraged.

57. Allied to the lack of an overall shared vision for forestry, the breadth of opportunity for a wide range of forest types and silvicultural practices is not currently being recognised or well supported. The focus on single-purpose forestry (either wholly commercial or wholly for biodiversity) hugely limits the realisation of the potential contribution trees can make to the overall success of the country. This also has an impact on the question of land suitability, as current assessments – whilst excellent - appear to take a narrow view of forest type based on productivity. The role of native and mixed woodlands is underplayed, as demonstrated by the very low proportion of broadleaves planted in recent years (excepting 2020, which reflects a concurrent major reduction in commercial forestry applications). This gap is particularly important in the context of new markets for carbon and demand for other 'ESG' goods and services currently increasing rapidly internationally.

58. The objectives of this workstream are therefore to:

- Establish a cross-society vision of the role of trees, woods and forests in Ireland's future – including social, environmental and economic outcomes in alignment with the UN's sustainable development goals and the EU Green Recovery Plan.

- Align the actions of key public organisations to the delivery of the vision

- Build and support a coalition of stakeholders to support, champion and promote delivery of shared forestry objectives

- Establish a shared, objective assessment of the suitability and availability of land for a range of different types of forestry across Ireland.

Progress to date

59. It is fair to say that the political profile of forestry is extremely high at the moment – unfortunately not in the way that Jim Mackinnon had hoped. Other recommendations in this workstream have received less attention as the new government has bedded in and DAFM has focused on tackling the licensing crisis.

60. There are excellent reports, information and data on land availability which are not being used as effectively as they could be. As is often the case, the transformation of scientific data and information into knowledge, wisdom and action on the ground is imperfect. In particular the analysis of this data with regards to planting where there isn't a primary (or sole) objective to produce timber or woody biomass seems underdeveloped.

61. The establishment of the Forestry Policy Group by the minister has been widely welcomed as a means of opening up discussions on forestry across a wider group of stakeholders and encouraging different groups to listen to each other's concerns. The terms of reference for this group are very high level and the pandemic has inhibited constructive engagement, therefore some frustration is developing amongst attendees, whilst recognising that only so much could have been achieved in two meetings.

Key Actions

62. Develop a new **forestry strategy** for Ireland, underpinned by strong evidence and supported by an increased promotion of the **Irish Forest Standard**, Code of Best Practice and associated environmental guidelines. This should feed into any work on the proposed new Land Use Strategy, and the prioritisation of forestry in the successor to the current CAP.

63. The landscape of initiatives and organisations associated with forestry is confused, with gaps (e.g. promotional function) and overlaps (e.g. advisory roles). A much **clearer explanation of the roles and responsibilities of DAFM** (including any reference to 'The Forest Service'), Coillte, Teagasc and Coford is needed – especially with regards to the actions described in Workstream 3

64. **Engagement with stakeholders and wider society** will be particularly significant for this workstream, and will need to go well beyond the working-group model recommended for the other workstreams. A key role of the working group here will therefore be to support and ensure effective wider engagement with people beyond the FPG groups.

Suggested Deliverables

- Forestry Strategy

- Refreshed Irish Forest Standard and associated documents

- Updated terms of reference for the Forestry Policy Group reflecting other changes, including a forward agenda

- Website / web-pages to explain the landscape of forestry bodies in Ireland

- Refreshed mandate and profile for Coford

- Communications programme for Forestry in Ireland

Suggested milestones (dates to be proposed by working group)

- Timetable for the development of a new forestry strategy (including public engagement)
- First draft of forest strategy
- Publication of forest strategy and associated publicity
- Review of the current suite of Forest Standard documents and identification of areas for update
- Agreement with forestry representatives on combined approach to promotion of sustainable forestry

Workstream 3: Organisational Development

Scope

Rec	Description	Importance
9	Recruit additional inspectors and environmental specialists	1
10	Introduce genuine KPIs	2
11	Develop a Customer Service Charter	2
15	Raise the status and profile of the inspectorate	2
19	Review Education and training of forestry professionals	3

Objectives

64. As mentioned above, many stakeholders felt that problems in the department go beyond the specifics identified by Jim Mackinnon, and this is perhaps borne out by considering how the current situation has arisen. A common theme amongst stakeholders has been that the Department is "always reacting", appears to be taking an "ad hoc" approach to issues and "lacks visible leadership".

65. In addition, there is clearly confusion about the corporate persona of the forestry teams: is there a Forest Service and what is its role?

66. The primary objective of this workstream is therefore to ensure that the staff, structures and systems of the forestry team within DAFM are developed to meet the requirements of Irish forestry from 2021 onwards.

67. A secondary objective – which is strongly linked to workstream 2 (and in particular recommendation 13) – should be to ensure that the Department, Coford, Teagasc and Coillte work better collectively as the key public organisations responsible for the development, promotion, regulation and delivery of forestry policies.

Progress to date

68. There has been a universal welcome to the Department's large-scale recruitment of technical staff (10 new inspectors and 14 ecologists since January 2020), deployment of contract ecologists and the introduction of the weekly dashboard publication.

69. Evidence from the most recent dashboard (wk 1 February 21) shows that the area of felling licences issued each month has nearly doubled since October compared with the previous 7 months. There are also some limited signs of increases in the rate of afforestation approvals. Outputs from the FAC (and associated subcommittees) have also increased dramatically and are on track to have dealt with the backlog in appeals by June. However, judicial reviews of 4 FAC cases are underway, and information on the performance of the department with regards to throughput rates is poor. It has therefore not been possible to judge the proportional impact of the additional resources. Evidence from the dashboard suggests that the additional resource is not yet leading to a rapid enough increase in approvals to meet targets for afforestation.

70. Discussions with staff have highlighted a number of issues that go beyond the Mackinnon recommendations but are fundamental to moving things forward. Morale is low but there remains a strong shared sense of purpose, desire to improve things, and plenty of insight and ideas for what should be done. In particular, there is a sense that the full team could be deployed more effectively, and that management should be seeking help from within the organisation and from external experts (e.g. in comms and leadership development).

Key actions

71. Whilst additional staff have been recruited within the Inspectorate, their deployment has not yet yielded the necessary results to meet targets, and there are concerns about the overall management of deployment (e.g. induction, line management support, forward job plans etc). Part of the explanation for this is that the department has also had to contend with the impact of the pandemic, the change of administration and handling the not-insignificant pressures resulting from Brexit, and so senior staff in particular have been spread extremely thinly. The leadership and management of the teams under the Assistant Secretary General is very concentrated on a small number of individuals with wide spans. This is high risk and also appears to be resulting in internal inefficiencies, low morale and an unhelpful personality-driven 'blame culture' externally. **A review of the structure, skills and culture across the combined forestry teams** relative to the outputs sought is urgently required. This should include recommendations on training needs.

72. Once the process review in Workstream 4 has been completed the **structure and capabilities will then need to be updated** to ensure that form follows function, to drive out inefficiencies and to develop a culture of more positive shared responsibility. This review should also include consideration of the roles of Teagasc, Coford and Coillte in delivering forestry outcomes. This action will provide the basis for delivery of r9, r15 and r19 within the public sector.

73. The training needs of the public sector are likely to dovetail in some regards with the needs of the private sector (e.g. alternative silviculture, forest planning). It is therefore recommended to work with Coford to **identify shared skills needs and potential training providers**. A more fundamental review of forestry education has been suggested and probably has merit, but is out of scope of this report.

74. Customer relations must improve, and the root of this should be **a clear statement of performance expectations** embedded within a concise and readily available customer charter. This has to link to r13 in workstream 2 – commitments from prescribed bodies to agreed turnaround times within the memoranda of understanding are needed to deliver overall performance.

75. To monitor and drive progress, and to instill a culture of customer service, **more effective KPIs** must be established and incorporated into the Department's performance management. These must be meaningful and targeted on what needs to be managed rather than what is easiest to measure – for example there should be an indicator of the number of licences in the system that exceed the customer charter commitments.

76. It may be worthwhile considering this whole workstream within the context of a quality management system such as EFQM.

Suggested deliverables

- Renewed organisational structure, job descriptions and capability review for all DAFM forestry teams
- Customer charter
- Set of KPI's and associated targets
- New suite of training courses (ideally run jointly between DAFM and others)

Suggested milestones (dates to be proposed by working group)

- Completed review of DAFM organisational structure, roles, responsibilities and capabilities
- Completed review of respective roles and capabilities of Coford, Teagasc and Coillte
- Draft and final customer charters published
- Initial suite of KPI's and targets published and reported to Minister quarterly
- Completed training needs analysis

Workstream 4: Process improvement

Scope

Rec	Description	Importance
3	Introduce pre-application discussions with Issues / Action log	1
4	New requirement for Environment report supported by Planning Grant	2
5	Address problems with poor quality applications	2
6	Develop guidance on Habitats Directive as it affects licensing applications	2
7	Discuss with the EC the impact of the Directives and woodland creation to support the Climate Action Plan	2
22	Review forestry legislation	2
23	Explore potential for single consent associated with a management plan	3
20	Introduce fees for submitting applications, making submissions and lodging appeals	1

Objectives

77. The overall objective of this workstream is to improve the efficiency and effectiveness of the various licensing processes, so that they deliver better results, fully address legal and regulatory requirements and deploy resources more effectively.

78. Achieving the overall objective will require action by applicants and their representatives as well as by DAFM to drive out poor practice (e.g. inappropriate 'cut and paste' applications) and speculative applications which are the source of considerable inefficiency in the system.

Progress to date

79. Recommendation 20 has been implemented and has already addressed concerns about potentially vexatious third-party appeals. Some stakeholders have raised concerns about this, with regards to impacts on individuals' rights of appeal. However, appeals have been submitted since the new fees were introduced, which suggests that this change will have the desired effect of focusing effort on the most contentious or risky projects.

Key actions

80. Concerns about the legal context for the current licensing processes continue to be raised by staff and consultees. Many believe that current legislation and process has been introduced in a reactive and somewhat 'ad hoc' manner. The result is that there is low confidence in the efficiency of the application of current legislation and processes.

81. **Reviewing legal aspects** will deliver recommendations 6, 7 and 22 and is urgently needed before substantive changes to process can be fully implemented. This review needs to involve wider expertise on both EU and domestic legislation aspects (it may be useful here to draw in officials with relevant development planning expertise). This work should be supported by a working group that includes environmental specialists as well as the forestry sector to ensure that operational realities are taken into account and to increase the level of understanding within the sector of the legal position with regards to the European Directives. This review should also address the question of the usefulness and long-term applicability of the 20% rule.

82. An **end-to-end process review** using professional systems analysts is likely to be helpful in identifying further improvements. This was a very useful investment for tackling similar regulatory challenges in Scotland and would address some of the 'personality-driven' issues that have inevitably arisen in such a small and specialized sector. Part of this review should include a tightening of procedures for rejecting poor quality applications.

83. Following the previous two actions, **the introduction of straightforward new procedures** (including associated training) will deliver Recommendations 3, 4 and 5. The introduction of targeted pre-application discussions and issues and action logs is fundamental to improving the efficiency of the application process and can be done without waiting for the legal review discussed above. In spite of concerns from some within DAFM, there was strong support on all sides that local inspectorate staff should be included in these discussions. Concerns about the risk of this threatening the independence of inspector assessments are recognised, but ought to be addressed administratively (Scottish Forestry may be able to provide advice on how to approach this). The potential resource implications of this recommendation are noted, given the large number of small-scale applications. This additional cost could be reduced by making the pre-application discussion optional, providing advice by phone and by tightening the process for rejecting sub-standard applications.

84. The popular proposal for the **environmental report with associated grant** should be developed and piloted early and needs to ensure equity across applicant types as well as fitness for purpose, focusing on the genuine risks and not a 'worry and wish list'. Given the high rate of 'speculative' applications resulting in low conversion rates, suggestions from FII should be given greater consideration.

85. **A rapid feasibility study** could be carried out into Recommendation 23 (single licence) as it was pushed for by a number of stakeholders. It may be best if this work is commissioned by a third party. There are however considerable concerns about the feasibility of this approach given the very long timescales involved (>30 years). An alternative approach for larger holdings whereby a 5 - 10 year approval for planting, felling, thinning and roading may be more suitable.

86. All of the work in this workstream MUST be undertaken on a partnership basis, drawing on the considerable expertise of the staff and testing with stakeholders and proscribed bodies. These new processes should be considered alongside (or as part of) the wider transition process to introduce the next CAP.

Suggested deliverables

- Clearer explanation of the statutory basis for forestry regulation process
- Pre-application meetings and Issues Log process
- Updated licensing process
- Pilot of environmental report process and recommendation for where this should be used, alongside grant support
- Training courses established for DAFM staff, prescribed bodies and registered foresters to embed new processes for pre-application meetings, issues log and environmental report
- Feasibility and cost-benefit study into single application process
- Improved processes for registered foresters to keep abreast of changing environmental regulations

Suggested milestones (dates to be proposed by working group)

- Pilot of pre-application process completed
- Targeted pre-application meetings and issues log introduced for new applications
- End to end licensing process review completed
- Pilot areas for environmental report and grant process identified and work initiated
- CPD events for registered foresters introduced

Section 4

Conclusions and recommendations

87. The recommended ways forward in the Mackinnon report remain pertinent in spite of the delay in full implementation. Actions by DAFM to tackle the backlog are starting to bear fruit, and the concerted effort to reduce the pressure on timber supplies to processors has been welcomed.

88. The delay in full implementation of the Mackinnon report has led to increased tension throughout the network of people, communities and organisations with an interest in forestry. Visible progress (to the end of January) has not been sufficient to address the underlying problems of uncertainty, timescales and lack of trust and confidence.

89. Awareness of the Mackinnon report and the subsequent implementation plan was notably lower amongst stakeholders with interests beyond softwood timber production. The most vociferous advocates of full and rapid implementation were primarily those with commercial interests as growers, managers or processors. This imbalance needs to be addressed by *all sides* if sustained and sustainable progress is to be made.

90. Many of the issues tackled in the report are the result of: the growth, success and maturation of the commercial forestry sector; long-standing stakeholder concerns about the environmental impacts of different types of forestry; legacy woodlands which do not meet current standards of sustainable forest management, and a changing regulatory environment within the EU and domestically. These issues will not be solved by government action alone and will need additional concerted effort by stakeholders if the potential of Irelands trees, woods and forests is to be realised.

91. A summary of the full recommendations contained in this report are included at Annex 3 and are summarised as follows:

    • Transparent, inclusive and systematic progress with the Mackinnon recommendations will best be achieved through the establishment of a formal project with clear scope, governance, deliverables and reporting. The project needs to be resourced appropriately and should include key stakeholder input and engagement through working groups and other mechanisms (recommendations 1-7)

    • The project should be organised to establish a more coherent strategy and vision for trees, woods and forests in Ireland; to address the problem of the backlog; to improve the efficiency and effectiveness of the licensing process and to ensure that the organisational structure, culture and systems within DAFM are suited for the requirements of the future strategy and processes (recommendation 3)

- Clear deliverables and milestones need to be agreed as soon as possible with the Project Board – including commitments to milestones and deliverables from stakeholders outwith DAFM (recommendations 8-11)

- Progress with the project should be monitored monthly and updates provided to the FPG quarterly (recommendation 12)

- A rapid overarching review of project progress should be undertaken within 6-8 months of initiation and advice provided to the Minister on any changes required to secure success (recommendation 13)

Annex 1: Recommendations of 'Ways Forward' from the Mackinnon report (my numbering)

Rec	Description
1	Raise the political profile and commitment to woodland creation
2	Focus action on reducing current backlog of applications
3	Introduce pre-application discussions with Issues / Action log
4	New requirement for Environment report supported by Planning Grant
5	Address problems with poor quality applications
6	Develop guidance on Habitats Directive as it affects licensing applications
7	Discuss with the EC the impact of the Directives and woodland creation to support the Climate Action Plan
8	Revise MoUs with NPWS and NMS
9	Recruit additional inspectors and environmental specialists
10	Introduce genuine KPIs
11	Develop a Customer Service Charter
12	Prepare a Forestry Strategy for Ireland
13	Ensure all State Bodies play their part in implementing the Strategy
14	Establish an Irish Forestry Standard
15	Raise the status and profile of the inspectorate
16	Need for greater commitment by all to partnership working
17	Raise awareness of value of woodland creation and a vibrant forest industry
18	Take stock of the multiplicity of campaigns and initiatives to promote woodland creation
19	Review Education and training of forestry professionals
22	Review forestry legislation
23	Explore potential for single consent associated with a management plan
20	Introduce fees for submitting applications, making submissions and lodging appeals
21	Pilot studies on land availability, including the potential for woodland creation on areas of unenclosed land

Annex 2: Summary of recommendations

1. The implementation of the ways forward recommended by Jim Mackinnon should be managed via a **clearly defined project**, adopting standard project management techniques (Para 31)

2. DAFM should deploy suitably skilled and experienced **project management staff** to support the project (Para 32)

3. The project should be structured around **4 workstreams** to cover: reducing the backlog; developing a shared national approach to forestry; improving the efficiency and effectiveness of the various licensing processes, and to ensuring that DAFM staff, structures and systems are developed to meet the requirements of Irish forestry from 2021 onwards. (Para 33)

4. **Governance** of the project should be established to ensure clear responsibilities, lines of accountability and appropriate stakeholder engagement. (Fig 2)

5. The **Project Board** should be chaired by the senior Project Sponsor / Senior Responsible Officer and two or three others, including from outwith DAFM. (Para 37)

6. A **Project Manager** should be nominated with overall responsibility for co-ordinating delivery, allocating resources and overseeing risk management. (Para 40)

7. Each workstream should have a nominated **Workstream Lead** responsible for delivering agreed tasks and outputs from each workstream and for reporting progress and issues to the Project Manager. (Para 41)

8. Each workstream to have **objectives and key actions** as outlined in paras 44 - 78

9. Each workstream to consider what **assistance is needed from outwith DAFM** to achieve the objectives and to establish appropriate working groups to secure this. (Para 38)

10. Firm **commitments from stakeholders** for contributions to milestones and deliverables should be secured. (Para 42)

11. **Deliverables and milestones** for each workstream should be agreed with the Project Board by 1/4/21 building on the suggestions included in this report. (Para 42)

12. Progress against the agreed milestones should be **reported monthly**, with summaries published on the DAFM website each month, and the FPG updated quarterly. (Para 43)

13. A rapid overarching **review** should be undertaken within 6-8 months of initiation and advice provided to the Minister on any changes required to secure success. (Para 43)

Annex 3. Timeline of key legal developments (*provided by DAFM*)

1992   **Habitats Directive Council Directive 92/43/EEC** of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora

Article 6.3. Any plan or project not directly connected with or necessary to the management of the [Natura] site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the [Natura] site concerned and, if appropriate, after having obtained the opinion of the general public.

2009   **Birds Directive (Original Birds Directive 1979) updated in 2009**.   Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds.

2009   **NPWS issued 'Appropriate Assessment of Plans and Projects in Ireland Guidance for Planning Authorities'**

2011   **Transposition of Habitats and Birds Directive into Irish law.** S.I. No. 477/2011 - European Communities (Birds and Natural Habitats) Regulations 2011.

2012   **Forest Service, DAFM introduce screening for Appropriate Assessment**. Assessment required Inspectors to examine effect on European sites. 3km and hydrologically linked.

2017   **Forestry Act 2014 commenced** – statutory appeals system set up and Forestry Appeals Committee established with independent chair.

2018   **People Over Wind, Peter Sweetman versus Coillte Teoranta** 12 April 2018

Question referred by Irish High Court to CofJ: "Whether, or in what circumstances, mitigation measures can be considered when carrying out screening for appropriate assessment under Article 6(3) of the Habitats Directive?"

ECJ Judgement C323/2017:

Article 6(3) of Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora must be interpreted as meaning that, in order to determine whether it is necessary to carry out, subsequently, an appropriate assessment of the implications, for a site concerned, of a plan or project, it is not appropriate, at the <u>screening</u> stage, to take account of the measures intended to avoid or reduce the harmful effects of the plan or project on that site.

2019   **Change in procedures in DAFM. IFORIS automatic listing of all European sites within 15 km to be considered when screening**, in addition to Inspector considering hydrologically linked sites outside 15 km. (15km had become norm for considering sites in other sectors.

2019   **Eoin Kelly versus An Bord Pleanála** 15 April 2019

The High court did not find that Sustainable Urban drainage Systems (SUDS) and other mandatory standards and best practice environmental measures can be considered in every screening for Appropriate Assessment. It is always necessary to analyse whether the measure, however described and whether or not it has another purpose is proposed with the intention of avoiding or reducing a harmful effect on a European site. If there is a Source-pathway -receptor connection between the proposed development and the qualifying interest of a European site and potential harmful effects have been identified, measures to avoid or reduce those effects must be excluded from the <u>screening</u> analysis

2019   **Heather Hill management Company CLG versus An Bord Pleanála   21 June 2019**

The court held that the Board had relied on a commitment to comply with 'best practice measures' during construction in order to minimise any emissions into the Trusky Stream, which was identified as being a potential pathway to the Special Protection Area (SPA) and Special Area of Conservation (SAC) in Galway Bay. The court held that this commitment to comply with 'best practice measures' represented an avoidance or reduction measure that must be excluded for the purposes of reaching a <u>screening</u> determination.

2019   **Change to DAFM procedures to take account of Court cases**, and in particular that mitigation measures including best practice measures could not be taken into account when making a screening decision.

2020   **Amendment to Forestry Act** – payment for 3rd party appeals

Other relevant case law includes
- Case C-258/11 Peter Sweetman and Others v An Bord Pleanála
- Case C-164/17 Edel Grace and Peter Sweetman v An Bord Pleanála
- Case C-461/17 Brian Holohan and Others v An Bord Pleanála

Annex 4. Related and relevant issues raised but out of scope

1. There are clear parallels with the conditions in Scottish forestry between the 1990's and 2010's which present learning opportunities for Irish forestry. However there are significant differences – particularly in relation to land tenure, legislation and recent landuse policies and practices. At the most fundamental level, an issue common to Scotland, Ireland and elsewhere is the need for a societal 'licence to operate' for forestry to be sustained in the medium to long term. This societal licence demands that the public benefits are clearly accepted as exceeding the public costs and risks associated with forestry operations. Without this, political, financial and legislative barriers will not be overcome. The recommendations in the Mackinnon report go some way to addressing this, however additional work to improve local and regional community engagement with their local forests would help to mitigate the risk of similar issues arising in future.

2. A number of stakeholders raised questions about forestry education (current and historic) and the potential for skills gaps to develop as policy and practice changes.

3. There are significant silvicultural opportunities offered by the site conditions in Ireland. The over-reliance on a single species is unnecessary and short-sighted when one considers the threat of further environmental change due to climate change or new pests and disease, or the future potential of the bioeconomy. The development of the forestry strategy must therefore include the consideration of a much broader range of silvicultural approaches.

4. The concentration of risk within the forest nursery sector is a key node for the whole forestry system which should be better understood and appropriate mitigation considered.

5. The impact of wild deer on forestry is significant and growing. You may wish to consider the most cost-effective means of containing this threat, otherwise the costs on forest establishment, habitat condition and silvicultural options will increase considerably (as is seen in Scotland).

6. The global carbon economy is advancing at pace, and Ireland could be well-positioned to benefit from this, given the good growing conditions. This could stimulate new business models and provide additional funding for woodlands that may not be at 'maximum' timber production levels.

7. A number of stakeholders raised the handling of Chalara in Ash trees as an area of considerable concern.