



# Forestry Policy

*Putting landowners  
front and centre*

November 2023





# ACA Forestry Policy: *Putting landowners front and centre*

## Introduction

The Agricultural Consultants Association (ACA) is the representative body for private agricultural advisors in Ireland. It has approximately 200 members and provides farm advisory services to about 55,000 farmers many of whom have planted some of their land with trees<sup>[1]</sup>.

ACA considers that forestry is a very positive land use, and has, in earlier commentary, highlighted its concerns about the alienation of farmers from forestry and how DAFM schemes have and continue to work against forestry.

ACA is very concerned about the serious decline in afforestation in Ireland and it wishes to engage further with DAFM to assist and progress the integration of forestry and farming at the institutional level. The Association has prepared this policy paper to provide perspective on farmers' views of forestry and accordingly to progress a more appropriate model of forestry.

## Context

Legally binding climate change obligations now require a very considerable increase in afforestation rates in Ireland. This is because forestry is the primary scalable CO2 removal measure available in the near term in the landuse sector.

In order to balance residual emissions, minimum annual afforestation areas required, range from 13,000 hectares(ha) to 16,000 ha annually between the years 2025 and 2050<sup>[2]</sup>.

A recent EPA report has advanced these areas further, noting that the approximate levels of afforestation required to meet net-zero targets are: 20,000 ha of afforestation per year in the period 2025–2050 for net zero excluding methane (CH<sub>4</sub>), and 35,000 ha of afforestation per year over 2025–2050 for net zero including CH<sub>4</sub><sup>[3]</sup>.

Climate change mitigation is not the sole driver for increased afforestation; there are sound financial and environmental imperatives at play here also including sustainable production of materials for biomass and building and biodiversity for example.

Notwithstanding the various imperatives and reasons noted above, government policy currently has an afforestation target of 8,000 ha per annum.

Current forest policy has failed, year on year, to achieve what is now scientifically established as an inadequate target. In the past few years, planting has barely reached 2,000 ha per year. The indications are that the 2023 figures will be lower again.

It is abundantly clear that continuing with the same policy and using the same approaches will not yield different results. A new paradigm, which places the landowner at the front and centre of forest policy, is now necessary. ACA's farmer centred approach will emerge as this document progresses.

[1] Supported by the number of BISS applications and other scheme work completed by ACA members.

[2] David Styles, Afforestation Scenarios in achieving net carbon emissions by 2050

[3] Land Use Review: Fluxes, Scenarios and Capacity Evidence Synthesis Report, Prepared for the Environmental Protection Agency by Department of Natural Resources and the Environment, School of Science and Computing, Atlantic Technological University, ATU Galway. Authors: Eamon Haughey, David Styles, Matthew Saunders, Ruth Bennett Coady and James Moran

## Where is the Land for Future Afforestation?

A pertinent question is: do we have enough land to go where we need to with afforestation? It has been well documented that there is a sufficiently large pool of agricultural land available within the State to supplement the forested area by 0.475 million ha to arrive at a productive forest estate comprising of 17% of our landmass<sup>[4]</sup>. The existing evidence base already allow decisions to be made and implemented without recourse to a raft of new administrative procedures, land use studies or research initiatives<sup>[5]</sup>.

Almost all of the suitable land identified by Farrelly et al., is actively managed farmland and is privately owned.

It is self-evident that, if there is to be any future notable expansion of the forest estate, this must involve meaningful engagement with landowners. There is simply no other place to go.

Before looking forward, a glance backwards is necessary to get a deeper insight into how the ongoing forestry malaise has emerged as it is ACA's considered view that it is deep seated and not entirely of recent times.

## The Marginalisation of Forestry from Agriculture

Afforestation is a relatively new land use in Ireland being less than 100 years established to any significant degree. For the first 70 of those years, forestry was exclusively in the domain of the state. Planting policy and attendant legislation was single minded and it assiduously sought to increase forest area from a centrally understood or top down social and economic perspective.

However, that singlemindedness starkly conflicted with the small farm proprietorship model equally promoted by the new Irish State which was, and is still, deeply embedded in the national rural psyche<sup>[6]</sup>.

This dissonance caused tension and the state's pursuit of mostly marginal land for forestry means that many farmers still see forestry as an enterprise of last resort and associate it with failure of farming. This widely held perception by farmers of a 'land grabbing' state planting 'good' land remains and indeed has unfortunately been recently reinforced<sup>[7]</sup>.

The state forestry sector has been administered by the Forest Service operating for the most part under the auspices of the Department of Lands. The service was organised in a bureaucratic fashion and its modus operandi was often at odds with farming and farmers. There remain many legacy issues and the present Forest Service is not viewed as farmer friendly nor is it considered to understand Irish rural society.

---

[4] This equates to an annual planting rate of 20,000 ha for each of the next 24 years – from now to 2047.

[5] Farrelly, N. and Gallagher, G – An analysis of the potential availability of land for Afforestation in the Republic of Ireland

[6] Embodied in 'One more cow, one more sow, one more acre under the plough' – attributed to Patrick Hogan, Minister for Agriculture 1922-24, 1930-32

[7] The Coillte Gresham House arrangement being a case in point.

It was not until the late 1980s with the introduction of the Western Forestry Package that there was any investment by the state in private or farmer forestry. Forestry development programmes have been ongoing since that time but only in relatively recent times has promotion and regulation of the private forest sector come to sit in the Department of Agriculture (now DAFM).

The advent of state supported private forestry in the 1990s was initially quite successful, but it can be argued that it captured the 'early adopters' or the 'low hanging fruit'. The approach to private afforestation mirrored the state's dogmatic afforestation model with poor integration with conventional agriculture and little encouragement or requirement in these schemes for farmer involvement in forest management. The way of doing forestry, albeit unstated, was: plant the land, close the gate and look at it in 15 or 20 years' time. For many farmers it was the end of farming for them and the termination of their connection with the land. This approach has amplified farmer antipathy to forestry.

In reality, forestry is seen by farmers as competing with, rather than being complementary to agriculture. Farmers in Ireland carry out various livestock and crop enterprises on their holdings and, from a regulatory perspective, DAFM treats these enterprises on a whole farm basis. Forestry exists outside this institutional structure and, from the farmers' viewpoint, forestry is marginalised from mainstream agriculture and their value systems: it is a different enterprise entirely.

### **DAFM and Forestry**

DAFM is charged with the regulation and development of agriculture and forestry in Ireland with the forestry element operated by the Forest Service of that department. The Forest Service, reflecting its chequered past, is a relatively new addition to DAFM. Its performance in terms of meeting key policy objectives, based on its own statistics has been mediocre at best[8].

From DAFM's perspective, forestry is discriminated against and disadvantaged because it is not considered as an agricultural enterprise. As examples: older farm forestry is not eligible for the Basic Income Support for Sustainability Scheme (BISS) and associated schemes while lands planted since 2008 is; land under forestry is not considered for the Areas of Natural Constraint Scheme (ANC) payment whereas land in tillage systems is payable, farmers whose lands are under older forestry are excluded from the Targeted Agricultural Modernisation Scheme (TAMS).

In simple terms, a farmer growing a field of barley is in a different world to a farmer tending his/her 20-year-old oak trees, yet both are raising crops and following the very same principles of agronomy.

These shortcomings, combined with a currently dysfunctional regulatory forestry system makes forestry a wholly unattractive proposition for farmers[9]. To further compound and frustrate matters, the regulatory system is dramatically out of step with the EU norm[10]. It needs to be rethought and reconstructed[11].

---

[8] <https://www.gov.ie/en/collection/20d6c-forestry-division-monthly-reports/>

[9] <http://www.coford.ie/media/coford/content/publications/projectreports/forestregulation.pdf>  
<https://www.irishexaminer.com/farming/arid-40911752.html>

[10] Geraldine O'Sullivan, Forestry legislation - How other EU countries approach tree felling, IFA, 2021

[11] The conflation arising from the misinterpretation of the word 'project' in the area of appropriate assessment needs to be addressed and cannot be left to narrow opinion. Ireland is clearly an EU outlier on this point but there is a reluctance to tackle this matter.

A landuse regulatory system that makes it much easier for a farmer to switch from, say, extensive beef production to intensive dairy production than to convert to any type of forestry is perplexing and is contrary to goals for sustainable agriculture committed to in policy and in law.

### ACA proposals for change

ACA states that there must be complete integration of farm activity with the same landuse and agricultural regulations governing all farm enterprises. Combined with well-targeted and resourced extension and structured farmer training in forest management, incorporation of forestry with agriculture would keep farmers meaningfully engaged with their land making forestry a real farm enterprise and delivering better outcomes in the social, economic and environmental aspects of forestry.

Very considerable work needs to be done within DAFM to pragmatically site forestry activity more centrally and clearly within the ambit of farming to make farmers and landowners more receptive to it and amenable to viewing forestry as a 'normal' farm enterprise. This will require an unravelling of 100 years of practice and a fundamental shift in thinking within that department. Such an institutional change will be challenging and will, no doubt, be resisted. This, however, is all the more reason for a considered approach to reconstruction in the dialogue between DAFM and the landowners, the key stakeholder, in the forestry process[12].

Critically, a changed approach must recognise the stark differences between farm forestry and the old state model rather than persisting with a template in which farm forestry exists in a limbo, somewhere between mainstream Coillte forestry and agriculture[13].

The essential point, which must be definitively addressed, is: forestry is a practice carried out by farmers on their farms and must be fully integrated with other land management practices on farm land.

### What does this policy shift mean in practice?

Such a policy change must ensure that supports and incentives work at farm level and that blocks and disincentives for forestry are removed. In practice this should ensure that there is:

- **No loss of farm income**, the decision to plant trees should not involve any payment disincentive and any such payment reductions should be addressed.
- **No undermining of farmer status**. A farmer planting land at present can have their farm number withdrawn or made dormant. This is not the case with a farmer who sows tillage crops who retains their farm number and the status that is associated with it.
- **No exclusion from any farm schemes**. In some schemes forestry land is considered to be 'ineligible'. This anomaly should be addressed as should the determination that managing forestry is not an 'agricultural activity'.
- **Equitable treatment of 'old' forestry and 'new' forestry**. The differential regulatory approach to farmland planted prior to 2008 and post that year is illogical and should be removed.

---

[12] There was much evidence of status quo inertia in Project Woodland which was designed, managed and absolutely controlled by state actors.

[13] Farm forestry is a long-established farm practice in many European countries.

- **There must be positive and real valuation of farmer stewardship of all land including forest** for new public goods such as carbon sequestration and biodiversity enhancement. Talk and an expectation of altruism will not deliver these societal benefits.
- **A whole farm approach by DAFM.** In simple terms this means that the entire land area of farm is treated by the Department as a farmed entity irrespective of the land use.
- **An elevation of farm forestry in DAFM's thinking** to reflect farm forestry's importance and community significance. The present situation represents many years of poor management and inadequate resourcing.
- **The dedication of a well-resourced advisory system (public and private)** to bring forestry into mainstream multifunctional farming and to keep it there. The current approach is piecemeal and inequitable (see also below).

In tandem with these efforts, it is of the utmost importance to put in place a regulatory rather than a licencing approach to farm forestry. This would regain the trust and confidence of the farming community and create an environment where all farmers have a clear vision of how forestry fits within agricultural schemes and not outside them.

Forestry must be a real and straightforward choice for farmers. It is not that at present.

### **Increased Financial Incentives**

In addition to approach changes, increased financial incentives will undoubtedly be a prerequisite to the success of the next Forestry Programme. These in particular will relate to areas such as: current and future farm support payments; farmer/non-farmer support differentials; the duration of forestry payments; payment for ecosystem services; payments for carbon sequestration; full integration with CAP; grants support for compliance with public good regulation; the replanting obligation and the long-term nature of forestry.

There is an urgency to this task, the proposed incentives should be reviewed at an early stage and if necessary be revisited sooner rather than later. The ACA urges that an open mind must be kept on this front.

### **ACA Proposal to Promote Forestry Advisory Efforts**

To reiterate the core point, farm forestry must be recognised as an agricultural enterprise by DAFM (as it already is by Revenue). This institutional bias is a significant disincentive for farmers considering afforestation and it needs to be remedied.

ACA is satisfied to engage further with DAFM to assist and progress much needed policy changes. Even with the adoption of a revised policy which embraces forestry as a farming activity, realistically it is difficult to see how the afforestation targets will be achieved in the short-term. Nonetheless, the promotion process must begin at farm level as soon as possible in order to have any chance of reaching Government targets within the specified timeframe. ACA has a key role here.

ACA advisors, both agricultural and forestry and operate at farm level, are trusted advisors to more than 55,000 farmer clients and are uniquely placed to promote farm forestry, as well as supporting the active management of existing farm forests[14]. To date, ACA has largely been excluded from Forest Service funding to promote forestry, because advisory funding for forestry has and continues to be directed mainly through Teagasc. Farmers who use the services of ACA advisers are very unlikely to use the services of Teagasc as research has shown that there is little crossover between the private and the public advisory services[15].

The existing advisory funding approach in effect excludes 55,000 Irish farmers from the forestry advisory system.

It is very difficult to get farmers to look at forestry in a positive light at the present time. Prolonged one to one engagement with farmers will be necessary to build confidence and mainstream good practices, using both the public and private agricultural advisory services. It is they, as trusted advisors, who will carry out the initial interactions with landowners, subsequently screening and then referring interested farmers to specialist ACA/Teagasc forestry advisors who can engage directly and advise on the silvicultural practicalities involved and so on.

### **Key Points**

Given the starting point and the dire outcomes for continued forestry failure, it is imperative that there is deeper professional engagement at all levels with farmers - the key stakeholder cohort. Forestry must be mainstreamed as a farm land use.

There is an overwhelming requirement for a positive regulatory framework that supports farm forestry at a farm level. The current system is negative, it is not science or research based and assumes non-compliance as a starting point. It is anything but a positive message for greater afforestation.

\*\*\*\*\*

---

[14] Supported by the number of BISS applications and other scheme work completed by ACA members.

[15] Dunne, A., Markey, A., Kinsella, J. (2019). Examining the Reach of Public and Private Agricultural Advisory Services and Farmers Perceptions of their Quality: The case of County Laois in Ireland. [Electronic Version] The Journal of Agricultural Education and Extension.





## About ACA

The ACA is the sole representative body for private agricultural consultants and advisors in Ireland and is the largest provider of farm advisory services to farmers in Ireland. Currently, the ACA have over 170 member offices which employ around 280 Agricultural and Environmental professionals, as well as 200 people employed as administration and technical staff. Its members support over 55,000 Irish farmers across the country.

## Contact for Media

For further information and interviews, please contact:

[aca@pentagroup.co](mailto:aca@pentagroup.co)

[brian.mannion@pentagroup.co](mailto:brian.mannion@pentagroup.co)

[breiancarroll@aca.ie](mailto:breiancarroll@aca.ie)

