

Introduction

This submission is being made by Meitheal on behalf of environmentally aware indigenous peoples of Ireland under the FSC's standards PRINCIPLE 3: INDIGENOUS PEOPLES' RIGHTS

PRINCIPLE 3: The legal and customary rights of indigenous peoples to own, use and manage their lands, territories, and resources shall be recognized and respected.

As the indigenous peoples of this country we have watched over many years as our old forests and seed stands have been systematically destroyed. What makes this totally unacceptable is that it has been carried out by the hands or under the eyes of the very people who were entrusted to protect them.

Instead of enhancing the future of the forestry sector our trusted representatives have turned

Ireland's most biodiverse landscapes and ecosystems into monoculture deserts which have polluted our land both physically and visually.

When over 9% of Irelands lands, namely its forestry and commonage, were transfered to Coillte in 1989 the people of Ireland were never even consulted. We found ourselves in a position where the indigenous peoples of Ireland have had no say for a long time in the development of its forestry.

We have been left on the sidelines witnessing and warning of the dangers and impacts the present systems were having.

We feel it is our duty and our right to ensure that future generations do not have to suffer, due to the actions and inactions of the present systems to care for or manage this priceless resource.

We feel that up to this point the voices of the indigenous peoples of this country have never been considered as a vital and valuable addition to the developing and maintaining of a healthy sustainable forestry system.

Additions

GM Trees

Role of a diverse forestry and importance of the transpiration from forest cover in a full hydrological cycle

6.F: Control of Biotic Problems

6.F.6 Genetically modified Organisms (GMOs) are not used.

Addition to be made: "or tested in open field trials on irish soil."

FSC Criterion 10.6

Measures shall be taken to maintain or improve soil structure, fertility, and biological activity. The techniques and rate of harvesting, road and trail construction and maintenance, and the choice of species shall not result in long term soil degradation or adverse impacts on water quality, quantity or substantial deviation from stream course drainage patterns. (Not interpreted by IFCI.)

We question why this section has not been interpreted by the IFCI

The quality and supply of our water is intimately linked with the quality and bio-diversity of our forests. Transpiration from the forest cover is a vital part of our full hydrological cycle.

The present over use of monoculture crops and the practices of clear felling have a severe negative effect on the quality of transpired vapor from the forest cover.

Present and past clear felling, road and trail construction and the choice of species do result in long term soil damage.

This damage effects the soils ability to absorb rain water, leading to more runoff , soil erosion and degradation of the full hydrological cycle effecting both the quality and level of the water table as has happened across Europe.

Objections

• Coillte FSC certification

The main reason for our submission is to highlight the grave worries that we have in regard to the practices of Coillte and the their use of the FSC standard.

- We want to understand how the Soil Association who are regarded highly for their work in organics and environmental issues, could award FSC certification to Coillte. When the negative environmental, social and even economic effects due to the mismanagement of Irelands forestry's by Coillte are obvious.
- Coillte use the FSC standard as marketing and promotional tool to promote an illusion of environmental awareness and good management. While in practice they fail across almost all of the standards laid down by the FSC. i.e. attached add from Crann magazine highlighting sustainable image Coillte tries to sell using the FSC standard.
- Non compliance with freedom of information act 1997 and amendment act 2003
Buck passing between various the bodies with none accepting responsibility.

We would be very grateful if the IFSI could investigate Coilltes position as a semi-state body in relation to the freedom of information and why it believes itself exempt .

• NPWS Illegal works at Ullauns, Killarney National Park.

We would also like to object to the present scheme for deer control at Killarney National park by the NPWS and question the level of communications between the various forestry services. In the Killarney National Park Management Plan (NPWS 2005) the NPWS states "research and data collection has been, and will continue to be conducted and facilitated to provide an accurate scientific basis for planning development and management decisions within the KNP"

In regard to the fencing of Oakland's at Ullans, Gortroe and Polagower Killarney. The NPWS has been continuing a major study of the regeneration of Oaklands in Killarney for 34 years now. Commenced in 1972 by Dr Daniel Kelly of TCD. He studied the impacts on woodland flora of grazing animals (deer & sheep) in a fenced section of the Oaklands. The results were published in (Kelly 2000).

Kelly stated 'it has been reconised that both extremes - very high levels of grazing and very low level or zero levels -lead to relatively uniform ground floras in British woodlands (Kirby, Mitchell and Hester 1994). Clearly, for conservation of diversity, a balance needs to be struck. the present study echoes the findings of an overview of the situation in upland Britain: "a low level of grazing by herbivores in woodland provides a greater diversity in vegetation structure and species composition then either the current prevalence of overgrazing or the absence of grazing in fenced woods" (Mitchell and Kirby 1990). These authors also concluded that a low level of grazing may create maximal diversity among small mammals, birds and invertebrates.'

Why then is the NPWS expending vast amounts of money and resources to fence the areas listed above, when their own research highlights that it could have more detrimental effect then over grazing. Culling of deer numbers is the best solution and has been suggested many times but rejected.

Attached is a report on Illegal works at Ullans, Killarney National Park

Suggestions:

IFCI standard should be made compulsory not voluntary.

Coillte, NPWS and other forestry services should be better managed and coordinated to insure they are working towards the same end. Communication is very important to ensure lessons learned and knowledge gained by one department is available and used by other bodies involved in the sector. It is important that the left hand of forestry knows what the right hand is doing. i.e.. Killarney park deer control.

Prevention of multinational investment into the forestry sector in Ireland. (i.e. companies like Shell or Monsanto) who use / misuse forestry as carbon sinks to offset their environmentally damaging business practices.

Conclusions

After reading the 3rd draft of IFCI we were quite impressed and surprised by the detailed and forward thinking plans of the revised draft.

We have no doubt this is due to the newly implemented structure of the IFCI covering Environmental, Social and Economic considerations. This coupled with the recent inclusion and proper consultation of NGO's and the public in a open and transparent manner can provide a road map for the future.

We believe the foundations have been laid for the development of an Irish forestry management system that can work for the benefit of all peoples of this Island. Both present and future Economic, Environmental and Social requirements can be met and surpassed from building on this.

Having said this we would voice grave concerns at the present certification to FSC standards of Coillte.

Meitheal.