

Macroom District Environmental Group  
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Re: Irish Forest Certification Initiative (IFCI)

Stakeholders have been invited to make submissions before the end of February 2007 on a draft standard for Forest Stewardship Council (FSC) certification in Ireland.

We, Macroom District Environmental Group (MDEG), will not address this standard, as we consider the process by which it was developed to be flawed.

The development of Sustainable Forestry Management (SFM) is bound by the principles of Agenda 21, dictating fully facilitated public consultation and equal and integrative participation by the social, economic and environmental chambers.

MDEG is a voluntary, community-based organisation dedicated to environmental protection since 1985.

We were represented at the IFCI public consultation meetings at Mallow, Portlaoise, Galway and Dublin during February 2000.

Our grievance with the IFCI began at this time.

1. As invited, MDEG made a written submission regarding the Draft National Forest Standard No. 2 presented by IFCI at the aforementioned meetings.  
This submission was neither acknowledged nor engaged by IFCI.  
Neither SGS Qualifor nor the Soil Association were informed by IFCI of our submission.
2. The Draft National Forest Standard No. 2 was drafted by a steering committee comprising 4 chambers, 2 of which represented economic interests contrary to SFM, the principles of Agenda 21, and the Helsinki Process.  
Draft National Forest Standard No. 3 is essentially based on Draft National Forest Standard No. 2.
3. At the Forest Service public consultation meeting in Mallow on 6<sup>th</sup> April 2000 regarding SFM, the Forest Service representative chairing the meeting declared that FSC certification is “market-driven”, and that the Draft Forest Service Standards for SFM had nothing to do with the then-contemporaneous IFCI Standards process.  
This statement is irreconcilable with assertions by both Dr. Alistair Pfeifer (of the economic chamber of IFCI) on 21<sup>st</sup> November 2006, and by Tony Mannion (also of the economic chamber of IFCI) on 16<sup>th</sup> January 2007, at the Doughcloyne Hotel (Cork) and the Imperial Hotel (Cork) respectively, that FSC is the yardstick for SFM compliance in Ireland.
4. Since 1985 MDEG has opposed the privatisation and sale of the State’s forest estate.  
The Irish State Forestry Board, Coillte, since its establishment in 2001 has had responsibility for this estate.  
Since 2001, Coillte has had FSC certification, a condition of which is full disclosure of its activities that impact upon local communities.  
Yet Coillte has consistently refused to disclose information relating to its activities, citing its exclusion from the Freedom of Information Act 1997.  
This demonstrates that FSC certification based on the Irish standard does not require or encourage the certified entity to conform to the principles of SFM and the Helsinki Process.
5. As one of a number of voluntary groups that have engaged in the IFCI process, MDEG would expect to be facilitated to continue to take part in the public consultation on the Initiative.

Yet no notice was received by us of the series of public meetings scheduled for November 2006.

The only way that we found out that these meetings were taking place was through a public notice in the Irish Examiner on 18<sup>th</sup> November 2006 – 4 days after the commencement of this series of meetings – that erroneously stated the dates of the meetings to be during October and not November.

Just 2 members of the public came to the Cork meeting, and it was only by request of MDEG that another meeting in Cork was organised.

In view of the fact that IFCI received – among other funding – IR£10,000 from the Heritage Council to ensure that the consultation process is as successful as possible, this is disappointing.

Furthermore, a request from MDEG to IFCI for funding to cover the expenses incurred by our voluntary membership in attending meetings met with no response.

6. Despite Coillte's holding of FSC certification since 2001, it was necessary for the Minister for Agriculture and Food to impose a moratorium, in May 2006, on Coillte's forestry activities in all pearl mussel catchments due to that company's overuse of chemical fertilizers in upland plantations, leading to asphyxiation of the pearl mussels downstream.

This demonstrates that FSC certification has failed to reform Coillte in its approach to the natural environment.

7. During May and June 2006, MDEG, acting upon the concerns of a member of the public, attempted to obtain the contact details of the forester with responsibility for a Coillte plantation in North Cork so as to question the wisdom of a clearfell on a steep slope in that plantation during prolonged heavy rain over several days.

We met with obstruction and were unable to procure the forester's contact details.

This is typical of the barriers to public participation experienced by the voluntary sector, progressively since Coillte's FSC certification.

In conclusion, we believe that IFCI and the FSC certification process in Ireland to date have been dominated by the economic sector with little inclusion and often active exclusion of social and environmental interests, most markedly at local community level.

We long for authentic compliance in Ireland with the principles of SFM, and will support any initiative that takes genuine and fully inclusive steps towards this goal.

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Ted Cook (P.R.O.)  
Macroom District Environmental Group

25 February 2007