

FSC PRINCIPLE # 1: COMPLIANCE WITH LAWS AND FSC PRINCIPLES
Forest management shall respect all applicable laws of the country in which they occur, and international treaties and agreements to which the country is a signatory, and comply with all FSC Principles and Criteria.

FSC Criterion 1.3

In signatory countries, the provisions of all binding international agreements such as CITES, ILO Conventions, ITTA, and Convention on Biological Diversity, shall be respected.

1.A: Compliance with National and International Legislation

1. All relevant EU legislation and Directives as part of Ireland's obligations as an EU Member State. International legislation such as the CBD, CITES, ILO Conventions, ITTA will be respected. All regulations and the relevant elements of the current versions of Guidelines issued by the Forest Service (FS) and other Government agencies are complied with in documentation and in practice. These include:

In the MoV insert: EU Habitats and Birds Directives, EIA Directive, and any other relevant legislation. Refer to Appendix A.1.2

FSC Criterion 3.1

Indigenous peoples shall control forest management on their lands and territories unless they delegate control with free and informed consent to other agencies.

Add UN definition of Indigenous Peoples in Glossary under this section

Principle 4:

<p>4.F: Consultation on Social Impacts (also relevant to FSC Criterion 7.4)</p> <ol style="list-style-type: none">1. Managers ensure that there is adequate consultation with local people and relevant organisations. <u>At the very least</u>, local people and relevant organisations are made aware that:<ul style="list-style-type: none">• The Forest Management Unit (FMU) plan and associated documents are available for inspection to stakeholders;• Where group certification applies in the private sector, management plans would be made available for inspection according to group certification criteria;	<p>Communication policy to ensure local people are notified</p>
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<ul style="list-style-type: none"> • An unusual or high impact operation is proposed; • The Forest Management Unit is being assessed for certification. 	<p>Define high impact operation, i.e. clearfelling, replanting, etc.</p>
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<p>4.G: Grievance Resolution works.</p> <p>1. Managers have mitigated the wider negative impacts of forest operations on local people, such as noise, smoke and timber traffic, reduction in light due to planting, damage to water supplies, private property and/or roads, etc. Managers have responded constructively to any complaints they have received. Managers ensure that trees standing alongside the route used by the public through or beside the forest are reasonably safe through regular inspection and remedial operations. Risk of accident from other hazards is reduced through appropriate action including warning signs, fencing and remedial works.</p>	<p>Conditions in harvesting contracts in relation to disturbance, timber haulage routes, <i>etc.</i></p> <p>Communication with local people.</p> <p>Hazards, e.g. pesticides, felling, deer stalking.</p> <p>Records of tree safety inspections and tree surgery operations.</p> <p>Field inspection of roadsides and forest paths.</p> <p>Evidence of engagement with complainant, i.e. correspondence.</p>
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Principle 5: In the MoV of 5.E.2

For large conifer forests sample measurement (or height and/or **possibly** diameter) and use of appropriate yield models.

Delete 'possibly' and define clearer criteria.

Principle 6.2

<p>2. Nuisance species and/or vermin control is:</p> <ul style="list-style-type: none"> • Carefully planned; • Species specific; • Only carried out where strictly necessary; • Carried out in a humane manner; • Reducing rather than eradicating natural predator populations. 	<p>Examples of pest species include sika and fallow deer, grey squirrel, feral goats and rabbits.</p> <p>A national policy to control deer and grey squirrel is required, which should be implemented at a regional level.</p> <p>Compliance with Wildlife Act (1976) and Wildlife Amendment Bill (2000).</p>
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Principle 6.4

Under 6.D. 1 insert the following:

Enhancement and/or restoration is a priority in ancient semi-natural, i.e. those present since at least 1600 AD, and other semi-natural woodlands. No non-native species are introduced to such woods where they do not already exist and underplanted or invasive species are removed. Management in accordance with the FS Code of Best Forest Practice, the Native Woodland Manual and the Native Woodland Information Notes.

In the MoV insert:

All woodlands:

- Field observations
- Discussion with owner manager
- Management planning documentation
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Given that there is no more than 20,000 ha of ancient woodland in Ireland the following should be inserted:

Plantations on Ancient Woodland Sites (PAWS) are managed to ensure that they make a significant contribution to conservation of biodiversity at the landscape scale, whilst at the same time reflecting the owners objectives.

Owners/managers maintain the biodiversity and other environmental values of the plantations on ancient woodland sites. Taking the certification area/forest management unit as a whole, they also achieve an overall enhancement of such values. This will often involve the restoration of some areas to native woodland.

This is achieved by:

- appraising the value and management of the PAWS in the context of semi-natural woodland and other habitats in the landscape
- carrying out ecological surveys and assessments of all plantations on ancient woodland sites
- evaluating these sites in terms of their biodiversity for biodiversity and their potential for restoration to native woodland in order to identify relative priorities between them.
- on the basis of this evaluation deriving a strategy which forms an integral part of the management plan and which identifies opportunities and priorities and will achieve the maintenance, enhancement and restoration aims.
- implementing this through suitable low impact silvicultural systems and sensitive forest operations
- monitoring and reviewing the outcomes to demonstrate that the strategy is being implemented and to assess how well the aims are being achieved.

In the MoV please insert:

All woodlands:

Management planning documentation

Field observations

Discussions with owner/manager

During survey and evaluation the following is relevant:

- Ecological survey to assess woodland type and biodiversity value

Ecological importance assessed using the following criteria:

- Ecological context at a landscape level
- Nature conservation designations (NHA/SAC, etc.) including adjoining sites.
- Regional scarcity or importance of woodland type
- Potential size of the restored woodland

Criteria for evaluating ecological potential for restoration include:

- Presence of locally native trees and shrubs
- Presence of characteristic native woodland flora (especially ancient woodland indicator species)
- Presence of old trees and deadwood
- Potential for Red Data Book species

Other factors that will influence the strategy include:

- Cultural and historic interest
- Scenic value and potential for landscape enhancement
- Amenity and recreation values
- Economic considerations
- Management of the remainder of the forest including the creation of new native woodland

Strategy

The owner/manager's strategy may identify three broad management categories (albeit recognising that there is a continuum between them) and will categorise stands according to the environmental priorities derived from the above evaluation:

- a) areas where biodiversity interest will be maintained but will otherwise be managed as conventional plantations;
- b) areas to be managed in a way that enhances their environmental values;
- c) areas to be restored to native woodland (i.e. to tree and shrub species native to that site).

Restoration Targets

As a guide owners should look to achieving restoration of 10% or more of the area of PAWS during the first 10 - 15 years following certification. In determining any restoration targets the owner/manager should make reference to the UK Forestry Standard (SN5 & Annex 3), national HAP and local BAP targets and other relevant local strategies.

Restoration should be concentrated on areas of highest priority for biodiversity enhancement.

Achieving these areas of restoration in the timescale suggested may not be possible where age structure makes this silviculturally inappropriate. Furthermore, in situations where an owner/manager is already achieving significant enhancement of biodiversity in other ways this generic target may not be appropriate. Examples of such situations include:

- where a significant proportion of the woodland/forest area (eg a third to a half) is semi-natural woodland managed in accordance with section 6.1.2;
- a significant proportion of the woodland/forest area (e.g. a third to a half) is being actively managed with biodiversity as a primary objective;

- where owners can demonstrate that they have achieved such rates of restoration since the introduction of the Broadleaves Policy in 1985;
- where comparable areas of forest are being restored to non-woodland habitat (see 3.5.1);
- where non-native species have a high ecological or cultural value.

In these situations owners / managers will have to set and justify alternative strategic targets which meet the objectives for biodiversity set out at the beginning of this section (These targets may also need to relate to targets set for other biodiversity management under 6.3.1.)

Revision of this section.

The methods of evaluation, the rates of restoration and the techniques employed will be reviewed in the light of developing knowledge and experience

In the restoration of ancient and other semi-natural woodlands, seed of local and regional provenance must be used. Only material derived from Irish provenance material can be used.

In the MoV insert:

Seed and plant supply invoices

Plant origin certificates

Principle 6.E.6

1. The impacts of harvesting are reduced through the following:
 - Harvesting within a catchment should be co-ordinated to the impact on the aquatic ecosystem;Please clarify/elaborate this sentence

Principle 6.F.4 Insert 'must' as indicated

Managers **must** maintain a written record of the precise usage (including reason, method of application, site and quantity) of all chemicals and retain all records for at least five years.

Principle 6.10.1

1. Forest conversion to plantations or non-forest land uses shall not occur, except in circumstances where conversion:
 - entails a very limited portion of the forest management unit; and
 - does not occur on high conservation value forest areas; and
 - will enable clear, substantial, additional, secure, long-term conservation benefits across the forest management unit.

What are the implications for land sales, dump sites, etc. I suggest we ask FSC for guidance on this matter.

Principle 7.A.2 Delete sentence as indicated as it's repeated.

1. The Management plan incorporates:
 - A statement of objectives;

- The rationale for silvicultural systems and prescriptions including species selection;
- An appropriate assessment of the forest including physical, ecological and landscape characteristics;
- Details of current standing crops, species and areas;
- The rationale for silvicultural systems and prescriptions;

Insert ‘of’ where indicated

- A vision of forest development over the long term, *i.e.* 50+ years;

Principle 8.A.2

2. An assessment is produced at the end of each 5 year period that includes an appropriate amount of information on:

Insert in the MoV: Forest audit by Manager to include the topics listed.

Principle 9: Intro box on High Conservation Forests

Note: About 100,000 ha of native broadleaved woodland remain in the Ireland of to-day, of which perhaps 20,000 ha could be described as ancient, *i.e.* woodlands that originated before 1600 AD, but which has been invariably manipulated by man to a significant extent. For the purpose of this Standard, it is proposed to describe the total native broadleaved woodland resource as “semi-natural woodland”. It has a widespread distribution pattern, is fragmented and grows under a wide variety of local climatic conditions and on a diverse range of soil types. Some of the woodland is owned by the National Parks and Wildlife Service, some by Coillte Teo. and by County Councils, and the remainder is on estates and farms nationwide.

<p>9.C: Monitoring of management measures in high value conservation forests</p> <p>1. Monitoring shall entail a walkover survey which will be conducted on measures/operations adopted on sites in the previous year. This information will be documented.</p>	<p>Management plan</p> <p>Interviews with management, field staff or contractors.</p>
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Principle 10

10.A.4

<p>1. New planting is designed in such as way as to facilitate the creation over time of a diverse age structure and habitats over</p>	<p>Forest Design plan.</p> <p>FS Code of Best Forest Practice.</p>
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<p>forest management units and group scheme areas. New planting shall also be designed in such a way as to ensure the creation over time of a diverse woodland with respect to species.</p>	<p>Site Development plan.</p> <p>This is achieved through one or more of the following:</p> <ul style="list-style-type: none"> • Use of a diversity of species, clones and provenances; • Planting mixed stands; • Variation in site types and growth rates; • Phased planting; • Retention of open ground • Phased planting • Design and creation of wind firm edges <p>Principles of Low Intensity Silvicultural Systems (LISS), e.g. Continuous Cover Forestry (CCF).</p>
<p>IFCI Interpretation</p>	<p>Means of Verification and Guidance Notes</p>
<p>10.B: Species Selection for Plantations</p> <ol style="list-style-type: none"> 1. The species chosen for plantations are suited to the site and matched to the commercial, environmental and social objectives. A varied species selection should take into account current and future market expectations for forest and non-forest products 2. Where there is a range of options in windfirm conifer plantations, lower impact silvicultural systems shall be increasingly favoured where they are suited to the site and species <p>The proportions of different types of species are as follows. These percentages apply over (1) State-owned forest management units and (2) the total forest area covered by group certification schemes which are privately-owned. The Forest Design Plan shows how these percentages will be achieved.</p> <p>(1) State-owned forests</p> <ul style="list-style-type: none"> • < 65% Primary Species; 	<p>Adherence to the FS Code of Best Forest Practice, Guidelines and Grant scheme regulations.</p> <p>Selection of Species Map.</p> <p>Plantation Profile.</p> <p>Lower impact systems can include:</p> <ul style="list-style-type: none"> • Group selection • Shelterwood or underplanting • Small coupe felling systems • Coppice with standards • Minimum intervention# • Single tree selection systems <p>Certificates of Seed Origin for Registered Species.</p> <p>This aspect will be carefully monitored by FSC.</p> <p>FS Biodiversity Guidelines.</p> <p>Valuable open space habitats include marsh, bog, open</p>

<ul style="list-style-type: none"> • > 20% Secondary Species; • 15% actively managed for biodiversity, including open space, containing up to 10% native species (Scots pine, Juniper, Taxus and broadleaves), if it does not have negative impacts on other important habitats or landscape features. <p>Where only one commercial species is adapted to the site:</p> <ul style="list-style-type: none"> • < 75% Primary species; • > 10% Broadleaf or Scots Pine; • 15% actively managed for biodiversity, including open space, containing up to 10% native species (Scots pine, Juniper, Taxus and broadleaves), if it does not have negative impacts on other important habitats or landscape features. <p>(2) Privately-owned grant aided forests</p> <ul style="list-style-type: none"> • < 65% Primary Species; • > 20% Secondary Species; • 15% actively managed for biodiversity, including open space, containing up to 10% native species (Scots pine, Juniper, Taxus and broadleaves), if it does not have negative impacts on other important habitats or landscape features. <p>Where only one commercial species is adapted to the site:</p> <ul style="list-style-type: none"> • < 75% Primary species; • > 10% Broadleaf or Scots Pine; • 15% actively managed for biodiversity, including open space, containing up to 10% native species (Scots pine, juniper, Taxus and broadleaves), if it does not have negative impacts on other important habitats or landscape features. <p>Note: In total, 30% of the species planted in all commercial plantations must be broadleaves. As 10% native species are required in biodiversity areas the remaining 20% may be commercial (Primary or Secondary Species) or environmental broadleaves (biodiversity).</p>	<p>water, heath, species-rich grassland, <i>etc.</i></p> <p>Examples of active management for biodiversity which will be site-specific may include; Planting up to 10% native species, graded road edges, natural regeneration in unproductive areas, protection of non-forest habitats, rock outcrops and streams. Where valuable habitats exceed 5% of the area the % native tree species should be reduced accordingly.</p> <p>In the areas managed for biodiversity, limited sustainable timber production may be a secondary objective using close-to-nature nature, low impact silvicultural systems, i.e. continuous forest cover.</p> <p>Native species include broadleaf trees and shrubs, Scots pine and Yew. Native species of Irish provenance must be used. Plant provenance certificates.</p> <p>Forest Service stipulations regarding afforestation grants, i.e. 30% broadleaves.</p>
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FSC Criterion 10.5 A proportion of the overall forest management area, appropriate to the scale of the plantation and to be determined in regional standards, shall be managed so as to restore the site to a natural forest cover.	
IFCI Interpretation	Means of Verification and Guidance Notes
<p>10.C: Restoration of Semi-Natural Habitats (Also relevant to FSC Criterion 9.3)</p> <p>1. Valuable habitats that have been colonised, planted or incorporated into plantations, but which have retained their ecological characteristics and have a high potential to be restored, should be restored or treated in a manner that does not lead to further loss of biodiversity or cultural value:</p> <ul style="list-style-type: none"> • Ridelines and open spaces containing remnant semi-natural communities are widened and extended; • Areas with potential for a rich ground flora and shrub layer are heavily thinned; • Remnants of underplanted wood pasture are gradually opened up. • 	<p>Identification of such areas in an ecological appraisal, <i>i.e. semi-natural grassland, bogs, marsh, etc.</i></p> <p>Ancient woodland/old woodland sites</p> <p>Proposals for such areas in Management plan.</p> <p>Areas for restoration may include heathland, bog and other open habitats.</p> <p>Maintenance of open ground around archaeological sites.</p> <p>Field inspection of such areas.</p> <p>Native broadleaves of local origin.</p> <p>Consultation with NPWS on valuable habitats.</p>
<p>2. Plantations on ancient woodland sites (PAWS) should be identified and their ecological, cultural and environmental attributes restored gradually and/or enhanced.</p> <p>3. Clear felling of part of an area within a Forest Management Unit and restoration of the area to non-commercial forest land is carried out only where:</p> <ul style="list-style-type: none"> • The new land use will be ecologically more valuable than the plantation, <i>i.e. PAWS or Old</i> 	<p>Ecological survey. Management Planning. Implementation measures.</p> <p>Avoid the occurrence of dense shade and desiccation. Avoid silvicultural operations and the use of machinery and pesticides that may damage native flora, fauna and soil.</p> <p>Plantations may be allowed to proceed to maturity, however active management will be</p>

<p>Woodland Sites or the removal of the plantation constitutes an improvement in the landscape or cultural/archaeological features.</p>	<p>required to maintain the biodiversity and other values of these sites.</p> <p>Refer to FSC 6.10.</p> <p>Management plan.</p> <p>Replanting obligations can be reviewed with permission from the FS.</p>
<p>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.</p>	
<p>Felling and restocking shall be in accordance with the principles and guidelines set out in the Forest Service Code of Best Forest Practise and suite of Environmental Guidelines. Particular attention should be paid to the Harvesting and Water quality guidelines. 6.E.4 is also applicable here.</p>	<p>Design plans should ensure that in large even-aged plantations the woodland improves in age structure through:</p> <ul style="list-style-type: none"> • Prescribing felling that is spread over a period of at least 20 years • Prescribing restocking which will provide options for further diversification and reduction in clearfell size at the end of the next rotation. <p>Site factors that favour larger coupe size include:</p> <ul style="list-style-type: none"> • Windthrow risk • Landscape scale • Current plantation design • Archaeological features • Wildlife habitats

FSC Criterion 10.9

Plantations established in areas converted from natural forests after November 1994 normally shall not qualify for certification. Certification may be allowed in circumstances where sufficient evidence is submitted to the certification body that the manager/owner is not responsible directly or indirectly for such conversion.

Ancient woodland, old woodland and designated woodlands (NHA, SAC, SPA) shall not be converted to plantation or non-forest land.
Areas converted from semi-natural woodland to plantation after 1990 shall not qualify for certification (unless the owner/manager can provide evidence that he/she was not directly or indirectly responsible for conversion).

Management plan.
Referral and approval of NPWS
Monitoring records

Restocking is in accordance with
Forest Service Limited Felling
licence requirements and as per
Native Woodland Scheme
Manual/procedures.