

Forestry EIA Directive Amendment

Comments by
Northern Ireland Environment Link

April 2017

Northern Ireland Environment Link (NIEL) is the networking and forum body for non-statutory organisations concerned with the environment of Northern Ireland. Its 70+ Full Members represent over 90,000 individuals, 262 subsidiary groups, have an annual turnover of £70 million and manage over 314,000 acres of land. Members are involved in environmental issues of all types and at all levels from the local community to the global environment. NIEL brings together a wide range of knowledge, experience and expertise which can be used to help develop policy, practice and implementation across a wide range of environmental fields.

These comments are made on behalf of Members, but some members may be providing independent comments as well. If you would like to discuss these comments further we would be delighted to do so.

Dr Jonathan PW Bell
Northern Ireland Environment Link
89 Loopland Drive
Belfast, BT6 9DW
P: 028 9045 5770
E: jonathan@nienvironmentlink.org
W: www.nienvironmentlink.org

Northern Ireland Environment Link is a Company limited by guarantee No NI034988 and a Charity registered with Inland Revenue No XR19598

NIEL welcomes the opportunity to comment on the amendment of Forestry related EIA regulations to bring them into line with the EIA Directive.

Question 1

We endorse woodland expansion in Northern Ireland that benefits and does not harm wildlife or the landscape. In this context we **strongly oppose all of the proposals to increase the Forestry EIA threshold**. We believe that the current thresholds are already higher than would be ideal to prevent environmental damage. The threshold should instead be lowered to 2ha to reduce the potential for damaging schemes to progress unchecked below 5 ha. The scale of plantation alone is a poor measure of environmental impact. Many priority habitats are in small parcels (<5ha) and could be destroyed by small scale planting. Equally, large scale planting in the right place could be a huge net benefit to the environment.

Many of the habitats at risk from this proposal are highly fragmented due to past conversion to forestry plantation, agriculture and development. Low grade agricultural land is particularly at risk because it is often targeted for afforestation but tends to be the best areas for existing biodiversity. We are concerned that the existing 5 ha threshold is already too high and may not be compliant with the requirement on Government to take practical steps to conserve priority habitats and species.

One of the proffered drivers for this change is that the burden of having to undertake an EIA is believed to be discouraging tree planting. However, this perceived problem would be better addressed through improved communication, guidance, early stakeholder dialogue and data sharing to address the misperceptions, and not by eroding environmental protections.

Proposing changes to the thresholds for afforestation projects when so few EIAs are currently required is a disproportionate response that undermines the Government's ability to meet its national and international biodiversity duties.

We would view any increase in the threshold as a clear erosion of an EU environmental protection measure that would not provide a 'high level of protection of the environment'.

Question 2

Yes

Question 3

We agree that in the interests of openness and transparency, non-electronic mechanisms (such as local newspapers) should still be used to communicate notices to the public.