

Clare Public Participation Network (PPN)
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August 27th, 2020

SUBMISSION from Clare Public Participation Network (PPN)

in respect of the Draft Agriculture Appeals (Amendment) Bill 2020

About Clare PPN: Clare PPN is a network of 296 community & voluntary, environmental and social inclusion groups in Co Clare. Clare PPN has three 'colleges' which gathers the member groups in terms of their interests and activities – an Environmental College, Social Inclusion College and Community and Voluntary College. Clare PPN exists to facilitate the formal participation by the community sector in Clare County Council's decision-making structures and to serve as a support and information sharing network for the Community and Voluntary Sector in Clare. It is funded jointly by the Department of Rural and Community Development and Clare County Council but is autonomous and its activities are directed by its members through an elected secretariat.

Clare PPN welcomes this opportunity to make a submission in respect of the Draft Agriculture Appeals (Amendment) Bill 2020 and we hope that our recommendations will be given due consideration.

Clare PPN is alarmed at the proposals contained within this Bill to severely limit the rights of members of the public and of environmental NGOs to appeal decisions made in respect of forestry activity. The Bill gives the Minister powers to specify a range of new criteria that a group needs to meet in order to be eligible to appeal a forestry licence. Clare PPN regards these as imposing severe limitations on which groups can engage in the appeals process.

Also of great concern is the negative impact this Bill would have on the independence and operation of the Forestry Appeals Committee. The Bill reduces oversight by the committee's chairperson and gives the Minister powers to issue directions to the committee.

The introduction of fees for appeals against forestry applications (or against any other development) is undemocratic and wrong. Ireland needs greater public participation, collaboration and trust in the activities and decisions of government and State agencies. Introducing fees creates an obstacle to public participation and sends a message that the interests of developers are more important than those of the public.

The proposals in Minister Hackett's Bill are a flawed attempt to address problems with the forestry licensing system; these problems are in turn due to the very poor quality of our existing forests. Ireland has a 'plant and abandon' forest culture, with no development vision for forests, and a Forest Service that has not enabled best-practice forest management. This has led to poor forest culture, resulting in the current stand-off between NGOs and the public on the one hand, and the timber/forestry industry on the other.

Clare PPN contends that a re-thinking of our forestry strategy is urgently needed to consolidate our indigenous timber employment, biodiversity and habitat expansion, and social cohesion through interacting with our forests. As Clare is one of the most forested counties, with a good mix of forest types and strong hedgerows, it could be the ideal place to start exploring new models through, for example, a new EIP (European Innovation Partnership) community forestry/ agro forestry project.

Clare PPN and its members were also surprised and very disappointed at Minister Hackett's approach to public consultation. The consultation process for this Bill was run in August, with poor publicity. Also, no postal address was provided, which serves to disenfranchise those who cannot make submissions via email.

Clare PPN is of the view that the proposals contained in this Bill are not what a new Minister should be prioritising, and calls on Minister Hackett to revisit her priorities. Clare PPN calls on Minister Hackett to abandon her proposed Draft Agriculture Appeals (Amendment) Bill 2020, and instead to prioritise improving the quality of licensing decisions by addressing longstanding issues within the system, and by correcting issues in forestry legislation.

Finally, Clare PPN urges Minister Hackett to open a full and genuine public consultation on Ireland's forestry policy and thereby take on board the views and expertise of those people and organisations who have strived over many years to create a more diverse, ecologically sound forestry that Ireland could be proud of. Hopefully, the outcome of such a process can be the creation of a new forestry programme that recognises community and environmental concerns.

Any queries in relation to this submission can be directed to: newsletter@clareppn.ie

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