



BirdWatchIreland
protecting birds and biodiversity

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Forest Service
Department of Agriculture, Food and the Marine

July 19 2017

Dear [REDACTED]:

I am following up with our phone call yesterday to present in greater detail my views on the consultation process of the Mid Term Review of the Forestry Programme. I am taking this opportunity also to express our considerable frustration with the manner by which the Forest Service conducts public consultations and to highlight that our most recent experience does not, in our view, meet the requirements of the Consultation Guidance and Principles document published by the Department of Public Expenditure and Reform.

Mid Term Review Consultation Process

BirdWatch Ireland made a submission to the public call for submissions on the Mid Term Review. After we received an acknowledgement of receipt of the submission, we received no further information until your email last week inviting us to a meeting one week later. This email also included a further developed version of the Mid Term Review as an attachment.

Following the review of the attachment Mid Term Review (Draft Proposals Version 3.4), I note that:

1. None of the points we raised in our submission were taken on board;
2. There was not one other mention of the consultation process or the substance of those submissions in Version 3.4 besides the mention of the receipt of 26 submissions to the Review.
3. There was no Consultation Report (in line with best practice) on submissions and how the Forest Service was responding to them;

In addition, there was no agenda for the July 18 meeting or any indication in the email that there would be a discussion on submissions and how they were or were not addressed. Therefore, on the basis of the emailed information we received, together with the lack of acknowledgement of BirdWatch Ireland's input to date, we have decided that we cannot afford to give any further resources to this process and that is why we did not attend the meeting in Portlaoise on July 18.

We have previously raised our concerns with the Forest Service consultation processes with the DPER who initiated the Consultation Guidance and Principles document as part of the Open Government National Action Plan for democratic reform. These concerns related to the flawed consultation process for the Environmental Requirements for Afforestation document which was published in December 2016, one month after the DPER Consultation Guidance document was published. In relation to both the Environmental Requirements document and the Mid Term Review, BirdWatch Ireland has invested considerable resources in reviewing Forest Service information, using our expertise and presenting our response, and we are extremely frustrated at the lack of acknowledgement or feedback with the exception of posting submissions on the DAFM website.



Directors: G Lyons, Chairman, D Fay, J Dowdall, B Lavery, J Lynch, T Culley, S Wilson

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In relation to the consultation on the Mid Term Review, from the outset the consultation process for the Review was not described in any detail to include the steps involved, how decisions would be made or even the detail that there would be a meeting convened. The DPER Guidance document specifically recommends the publication of a Consultation Report where feedback can be provided as to why views were or were not taken on board.

Content of the Mid Term Review of the Forestry Programme

The Programme for Partnership Government (2016) states on page 115 that “A review of the Forestry Programme 2014-2020 will take place in 2017 and will consider participation rates, climate change, environmental impact, rural communities and land use policy”. I cannot see any consideration of environmental impact, climate change, rural communities or land use policy in the Mid Term Review consultation document which means that the terms of this review are a breach of the political promise of the Programme for a Partnership Government. Specifically, we raised several environmental concerns in our submission and recommended that the monitoring commitments specified in the Forestry Programme be reported on but none of this information seems to be taken on board.

To summarise, the consultation process for this Review is unsatisfactory and not meaningful in our view. In addition, the substance of the Review is not complete as it fails to include a variety of issues which were detailed in the Programme for a Partnership Government.

As I mentioned on the phone yesterday, BirdWatch Ireland is keen to assist the Forest Service in meeting its obligations under law to protect wild birds and their habitats, to support afforestation in the right locations, and to be active participants as stakeholders. We strongly recommend that the Forest Service reconsider how it undertakes public consultations and to re-evaluate the content of this Review.

Regards,

Oonagh Duggan
Assistant Head of Division-Policy and Advocacy

CC: Michael Ewing- Coordinator of Environmental Pillar
Mr. Andrew Doyle, Minister for Food, Forestry and Horticulture
Mr. Aidan O'Driscoll, Secretary General, Department of Agriculture, Food and the Marine
Mr. Paschal Donohue, Minister for Public Expenditure and Reform



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