

Draft Northern Ireland Climate Action Plan 2023-2027

Consultation – October 2025

About the Institute of Chartered Foresters

The Institute of Chartered Foresters (ICF) is the Royal Chartered body for Foresters and Arboriculturists in the UK. We have 2,300 members who practice forestry, arboriculture and related disciplines in the private and third sectors, central and local government, research institutions, universities and colleges throughout the UK. The Institute regulates standards of entry to the profession. It provides support to its members, guidance to professionals in other sectors, information to the public, and educational advice and training to students and tree professionals seeking to develop their careers in the forestry and arboriculture industry.

Our response

The ICF has not submitted a response via the Citizen Space portal but requests that the Climate Action Plan consultation team accepts this paper as our response. This paper has been produced in consultation with our membership.

Our statement refers to Chapter 6: **Sector Policies and Proposals; Land Use, Land Use Change & Forestry Sector contribution to Carbon Budget 2023-2027**

Q17. To what extent do you agree with the proposed policies and proposals to reduce emissions for the LULUCF sector?

- Disagree

This response to the draft NI Climate Action Plan (the Plan) relates to the forestry sector and the statements within the Plan to:

- Adopt a policy approach to deliver the *Forests for Our Future* programme to create 9,000ha of new woodland by 2030.
- Increase annual afforestation rates to an annual rate of 600ha/year for the remaining three years of the Plan period 2024/25, 2025/26 and 2026/27.
- Support the development of policy with a series of actions.

It is noted that the deployment assumptions associated with a) and b) above are required to achieve the Plan's Central Scenario, described in the Plan as the 'most likely outcomes of policy and proposals'.

The comments in the two sections below at a) & b), are not a criticism of the important need for Northern Ireland to create more woodland at pace to deliver carbon sequestration and

many other ecosystem services such as biofiltration (both air and water), flood mitigation, habitat for wildlife, places for people to visit for their health and welfare and wood production. Rather it is a criticism that by stating or restating targets which are unlikely to be achieved, new woodland creation will fail to adequately support the Plan's Central Scenario and afforestation become seen increasingly as a poor option to help deliver the Climate Change Act (Northern Ireland) net zero emissions target.

A more desirable outcome would be to reset targets at a) and b) and focus on delivery, at pace, of new woodland creation grant schemes closely aligned and in close collaboration with the agriculture sector support schemes, e.g. DAERA's Sustainable Agriculture Programme. This is key to success since most land for future afforestation will be former agricultural land. Woodland creation support should include more specialist woodland types such as short rotation coppice (willow or other approved tree species) and short rotation forestry, both which can produce more rapid returns on investment which is particularly attractive to farmers, and both acknowledged as forest types in the *UK Forestry Standard*.

The effectiveness of tree planting in supporting resilient land use hinges on both the potential of the land and the opportunity cost of displacing existing uses. Planting "down the hill," where land is more fertile, can produce more productive, diverse, and better-structured forests. Economic appraisal and modelling will be essential to encourage investment from farmers and landowners, showing that landscape-scale forestry can provide viable long-term businesses. Since forestry benefits from economies of scale, collaboration between landowners—either through cooperation, joint projects or expansion of existing woodlands—will be key. The creation of viable, local forestry enterprises can boost resilience while unlocking opportunities in timber, recreation, and related sectors.

a) Policy approach to deliver the *Forests for Our Future* programme to create 9,000ha of new woodland by 2030

The Plan describes this policy approach as 'ambitious'; however, it is not made particularly clear how ambitious it is. Annual afforestation rates are targeted to increase to an annual rate of 600ha/year for the remaining three years of the Plan period 2024/25, 2025/26 and 2026/27, and the Plan indicates this would create 3,560ha of new woodland under *Forests for Our Future* by 2027. This would then require 5,440ha (9,000ha - 3,560ha) of woodland to be created in the final three years of the *Forests for Our Future* programme which equates to just over 1,800ha each year. This is a very steep ramping up of the annual woodland creation target for the remaining three years of *Forests for Our Future* period, and regardless of policy development to help increase support for new woodland creation, it is unlikely to be met and is hence very far from the Central Scenario definition as the 'most likely outcomes of policy and proposals'.

b) Increase annual afforestation rates to an annual rate of 600ha/year for the remaining three years of the Climate Action Plan period

A target of 600ha per year for 2024/25, 2025/26 and 2026/27 (the remaining three years of the first *Climate Action Plan*) is identified in the Plan. *Forest Service Annual Report 2024/25* stated that 502ha of new woodland was achieved in this year so the target of 600ha per year has



already not been achieved. To make up for the short fall more than 600ha are required for the remaining two years of the Plan. This is very ambitious, as some of the actions outlined in the Plan to promote forest expansion are only due to be delivered by the end of March 2026 (*Forest Service Business Plan 2025-26*) which means that only one year (2026/27) remains to significantly ramp up new woodland creation within the Plan period, which is unlikely to be met and is hence very far from the Central Scenario definition as the 'most likely outcomes of policy and proposals'.

c) Support the development of policy with a series of actions.

It is welcome to see comment in the Plan (Page 174) that: *'There are almost 1.4 million hectares of land in Northern Ireland, providing the foundation for our environment, our economy, and our society. Over one million hectares of this land is in agricultural use. Emissions from the LULUCF sector are determined in large part by how this land is used and managed therefore **close collaboration with the agriculture sector will be vital to ensure the correct policies on agriculture, forestry and the environment** are implemented including learning from existing policies.'* There are similarities between this, and the speech made by the then DAERA Minister when *Forests for Our Future* was first announced in the NI Assembly in March 2020.

The Plan identifies three actions to support new woodland creation (Page 177):

- i. During 2025 DAERA will take forward the business case for funding forest expansion schemes from national funds.
- ii. During 2025 DAERA will investigate the potential to develop new woodland creation schemes. Land suitable for afforestation is a finite resource with significant demand for its use from a number of competing sectors. It is important that afforestation is sufficiently attractive as a land use to encourage woodland creation at the required scale.
- iii. During this carbon budget DAERA will contribute to the UK Government working group to address the skills shortage in the forest sector and continue engagement beyond this as required.

Point i. is welcome and a requirement for sound governance. Point ii. should focus less on the competition for land between forestry, agriculture and environmental sectors since a very large part of the income from these sectors is already derived from direct government subsidy rather than the market. Therefore, developing new woodland creation grant schemes closely aligned and in close collaboration with the agriculture sector support schemes (e.g. DAERA's Sustainable Agriculture Programme) and other environmental schemes is more appropriate. This is key to success since most land for future afforestation will be former agricultural land. Action iii. is welcome, however could be improved upon further through ensuring that DAERA's College of Agriculture, Food and Rural Enterprise (CAFRE) makes a broad range of forestry skills training available to local people working in the land use sectors.



Q18. To what extent do you agree with the proposed approach to achieving a just transition in the LULUCF sector?

- Agree

The just transition considerations provided at pages 183-185 of the Plan for afforestation are to be welcomed and cover the issues involved very well. Afforestation provides many ecosystem services to local communities and the public and as such present few issues achieving a just transition.

Achieving a just transition in relation to individual landowners/farmers and their families may be more difficult. DAERA statistics report that farmers are generally made up of an older workforce (average age 59 years old, with 36% over 65 and 8% under 40), are owner occupiers and about 40% have an income in addition to farming. The average farm size is about 100 acres (half the UK average) and about 30% of land is in conacre. Analysis provided by local agricultural journals show that agricultural land prices have risen steeply over the past five years and non-farming money dominates the land market. Against this background, woodland grant schemes need to be sufficiently rewarding and operate over a sufficient time period, with simple application/claim process, a range of woodland options available to suit different needs and an opportunity for the landowner/farmer to take an active role in woodland creation and future maintenance if they wish i.e., to remain engaged in the management of their land.

Forestry is unique in its ability to bring widely ranging interests and elements together into cohesive, multi-functional solutions. That is why the ICF is **committed to working with government in the design and implementation of a successful approach to land management**, supporting a flourishing sector that delivers for climate, nature, people and economy.