

Options *for* Forestry



CONSULTATION PAPER

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Ministerial Foreword

Sustainable forest management is the stewardship and the use of forests and forest land in a way, and at a rate, that maintains their biodiversity, productivity, regeneration capacity, vitality and their potential to fulfil, now and in the future, relevant ecological, economic and social functions, at local, national and global levels, and that does not cause damage to other ecosystems.

(1993 Ministerial Conference on the Protection of Forests in Europe)

Almost all Northern Ireland's natural woodland disappeared over many centuries to help fuel our economic development. At the start of the 20th century woodland covered about 1% of the land and little of this resembled natural woodland. We have had to address the challenge of restoring and enhancing our forests. Today woodland covers some 6% of our land. We recognise that wood is a naturally renewable raw material and we need to practice high standards of sustainable forest management here, not least to support the UK's promotion of sustainable forest management in other parts of the world. Our impact on global forests is however much larger; each year we consume forest products equivalent to the production from an area one third the size of Northern Ireland.

International criteria and guidelines for sustainable forest management are expressed in broad terms. These have been interpreted in a UK context and have been set out in the *UK Forestry Standard* and accompanying guidelines. After commitments made at the 1992 UNCED Conference in Rio de Janeiro and at the second Ministerial Conference on the Protection of Forests in Europe in Helsinki (1993), the Government formally adopted a forestry policy to promote sustainability, which was expressed in terms of:

- ***The sustainable management of our existing woods and forests.***
- ***A steady expansion of tree cover to increase the many diverse benefits that forests provide.***

Forestry policy is a devolved matter and the emphasis and focus here may well be different from other parts of GB. However the *UK Forestry Standard*, and a desire to maximise the potential for forestry to contribute to the sustainable development of Northern Ireland, will underpin the policy.

Forestry is contributing in a crosscutting way at a strategic and a local level to many other strategies. For example, a number of key indicators of the success of the *Regional Development Strategy* are forest related. Forests, woodland and their associated open habitats and species are delivering some of the aims of the *NI Biodiversity Strategy*, and there are opportunities for forestry to contribute to policies on health and renewable energy.

Within this context the consultation paper seeks views on aspects of forestry policy where there are real choices to be made. I would encourage everyone interested in our forests and how we use them to take the opportunity to be involved in deciding the future shape of forestry policy.

Ian Pearson
Minister

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Invitation to Comment

The paper sets out the broad direction of forestry policy and identifies six key questions where the Forest Service wishes to consult publicly about the future direction of a forestry strategy for Northern Ireland. Attached to the paper is a linked draft Equality Impact Assessment which considers the implications for Section 75 (Northern Ireland Act 1998) groups of current Forest Service policies and future proposals set out in this Consultation paper.

Comments should be sent to:

William Webb
Forest Service Headquarters
Dundonald House
Upper Newtownards Road
Belfast BT4 3SB
Telephone: 02890524293
Text Phone: 02890524420
Fax No: 02890524380
E-mail: william.webb@dardni.gov.uk

before 31 March 2005.

Copies of this document can also be made available on request in accessible formats such as large type, Braille disc, audiocassette or in other languages. For copies please contact the Branch at the above address, by telephoning 028 9052 4293 or by textphoning 028 9052 4420. The paper is also available on the Forest Service website at www.forestserviceni.gov.uk/consultations and on the central consultation website at www.consultationni.gov.uk

Introduction

1. The Department of Agriculture and Rural Development (DARD) is responsible under the *Forestry Act (NI) 1953* for promoting the interests of forestry, the development of afforestation, the production and supply of timber and establishment and maintenance of adequate reserves of growing trees. The Forest Service is the Agency within the Department that discharges these responsibilities through management of its forests, by administering grant aid, by regulating the imports and exports of wood and bark, trade in seeds, plants and plant cuttings, and changes in land use concerned with afforestation, deforestation, forest roads and quarries.

2. In preparing this paper the Forest Service considered evidence from several sources. These included an evaluation of the impact of forestry since the last major statement of government policy about the purpose of expenditure on forestry in 1970 and the 90 responses to the consultation paper *Forestry in Northern Ireland* issued in June 2002. During 2003 the Service also prepared an Economic Appraisal of options that tested the impact of different levels of public expenditure. Finally, the Service obtained evidence from a number of recent customer surveys that provided a broad indication of the importance and value of public use of forests, and described public attitudes to the current management of forests and improvements that could be made to them. Copies of the appraisal and of the customer surveys are available on the Forest Service website www.forestserviceni.gov.uk

3. The emphasis of the *1953 Act* and its predecessor was to encourage the formation of new forests. By 1940 there were 18,500 ha, by 1959 there were 29,800 and by 2004 there were 85,700 ha. The increase was achieved in large part by public sector afforestation of peat boglands and wet mineral soils in the uplands with conifers. As the *Act* required, this was to provide an adequate reserve of growing trees against a period of national emergency. The Forest Service also acquired the demesne land of several estates. These contained areas of older mixed woodland which provided a valuable element of diversity of tree type and landscape, and in due course the *Act* was modified to allow the Department to devote some of its resources to developing Forest Parks, Forest Recreation Areas and to set ground aside for conservation purposes. Over time the general emphasis of government policy changed from treating forests as a strategic resource to treatment as an economic resource. However, the change in approach also coincided with greatly improved farming conditions, land became too expensive and the rate of forest expansion declined. From 1987 greater emphasis was placed on securing greater participation by the private sector and was achieved by increasing direct grant for landowners. Commercial development of public forests was encouraged by creating the conditions for private industry to become responsible for most of the timber harvesting. As the forests matured and increasing volumes of timber became available for industrial use, so innovative approaches towards timber marketing gave the industry confidence to invest in new sawmills and find sustainable markets for homegrown timber. All of this increased the value added contribution that forestry makes to the economy, doubled the area of privately owned woodland, and by increased use of broadleaved species introduced a valuable element of diversity into the Northern Ireland (NI) landscape. (See *Figures 1 & 2*)

The charts below provide an indication of the area of different tree species of Forest Service forests and those private woodlands in NI which have received grant aid

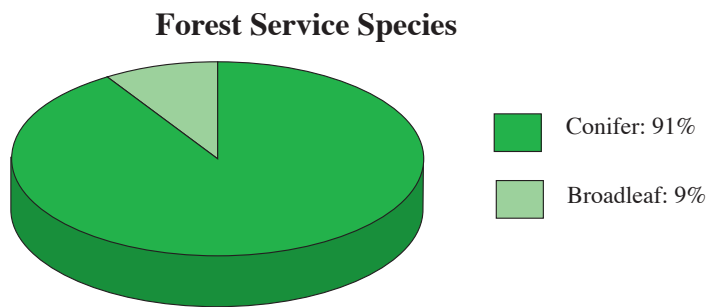


Figure 1

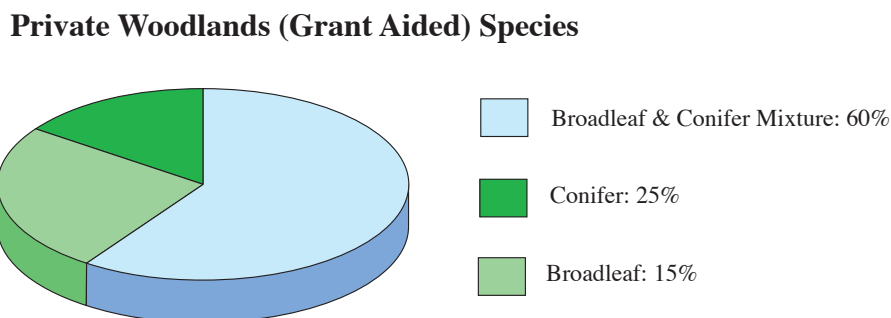


Figure 2

The area of forest in NI is now equivalent to 6% of land area (See Figure 3). This compares with 10% in Ireland and 12% in GB.

The map below shows the location of Forest Service forests and most grant aided private woodlands in NI

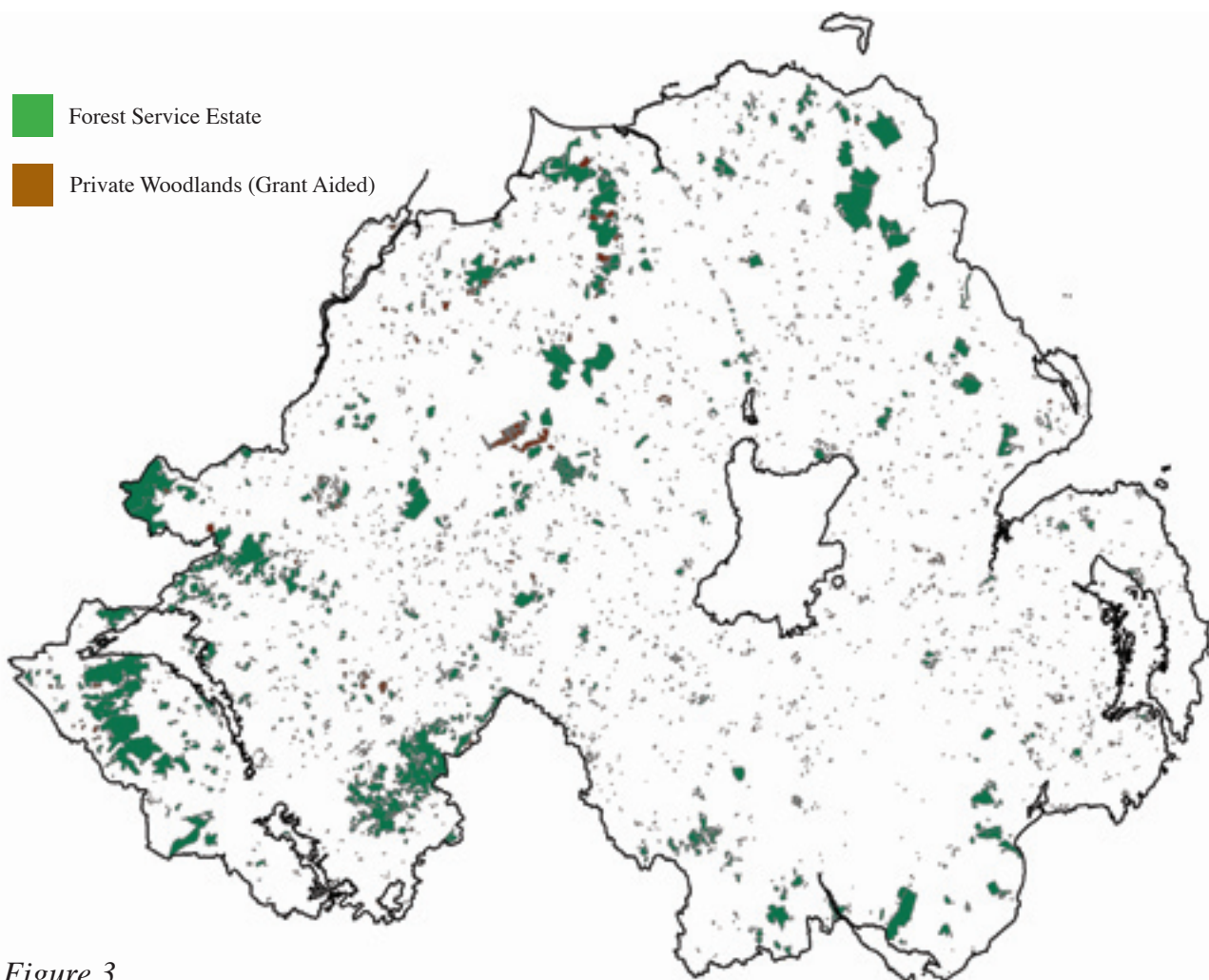


Figure 3

4. Forestry policy is now a matter of international importance, driven by concerns about deforestation and the impact of this on global climate and loss of biological diversity. The government has been active in encouraging international effort to secure sustainable forest management regimes. The UK government and the devolved administrations have decided to demonstrate the importance that they attach to these issues by developing credible standards of forest management and verification. They have agreed a process of setting standards, and the second edition of the UK Forestry Standard has just been published. This official Standard and the accompanying Guidelines underpin the UK Woodland Assurance Standard, which was developed by stakeholders through consensus as an additional voluntary standard against which management practice is audited. The result is that 90% of forest area in NI have been independently verified as meeting the requirements of the Assurance Standard.

5. This Standard requires forest managers to deliver a programme of habitat restoration, conservation and environmental enhancement. The forests also play a key role in providing improvements to quality of life through carbon sequestration in mitigation of the impacts of climate change, conserving and enhancing biodiversity and increasing landscape quality. As the public opinion and visitor surveys made clear, forests now provide an important resource in providing places to visit and to pursue a range of recreational activities.



6. The present review takes place against this background. The key issues are:

- ***How to obtain best value from the Forest Service estate.***
- ***The need to secure a balance of public benefits from forests through environmental improvement, public access and timber production.***
- ***The continuing scarcity of forest in Northern Ireland compared with other countries.***

7. The economic appraisal provided objective evidence of the costs and benefits that arise from management of our existing forest resources, and suggested ways in which policy should be developed in future. For example, the government accepts that forests should continue to produce timber because of the importance of the contribution to rural economies and so contracts have been signed for the sale and supply of timber from Forest Service forests up to 2009. Similarly, forests should continue to be accessible for informal public recreation because the demand clearly

exists, and forests should be managed with regard for the environment because they create diversity and interest. The government also recognises the strength of the view that we should have more trees in NI to improve our environment, and has made provision for landowners to take account of the option to convert agricultural land to forest under the mid-term review of the Common Agricultural Policy. It has also introduced a Challenge Scheme to encourage establishment of Short Rotation Coppice in support of renewable energy policy objectives.

8. However, there are real choices to be made about how this should be done and dealing with the consequences of increased forestry activity. The solutions may require changes to the *Forestry Act*, and the scope to take individual measures forward will depend on the availability of resources in the light of wider government priorities. There is some concern that tree felling is not regulated, that damage to minor public roads by timber lorries should be better controlled, that deer and other large forest mammal populations should be monitored and controlled, that public access to forests should be protected and there should be better provision for dealing with the costs of providing public access to forests.

9. To help consultees address the issues, this paper sets out a number of key questions. These are contained at the end of each section.

Benefits and costs of forests

10. The annual revenue generated from timber sales by the Forest Service is £5.4m. The largest monetary benefit from this programme is £18m of value added within NI by the wood processing industry producing sawn wood, sawmill co-products and chipboard. This complements imported timber, paper and board supplies to a very large secondary industry (NI output values are about £240m annually) that uses wood in construction, packaging, fencing and furniture. There is some evidence that products such as Sitka spruce grown in the British Isles may attract a premium from international pulp and paper producers because of inherently desirable characteristics in the wood fibre and scarcity of sufficient supplies elsewhere. This suggests that there is some potential to create a sufficiently large resource to sustain value added processes within Ireland over a period of decades.



11. The second major monetary benefit from forests is public access. The Forest Service receives annual gate receipts of £0.6m for car parking, caravanning and camping, but many forests are available free of charge. Research by economists at Queen's University Belfast established a model for calculating visitors' willingness to pay for access to forests, and from this the Forest Service estimated an additional value of visits to its forests as £1m. A survey of NI households estimated that 77% visited a forest at least once a year, with many visiting more frequently.

12. The current net annual cost of the forestry programme is £14.2m of which the largest single item of cost is a capital charge of £7.9m. This net cost takes account of the revenue generated from timber sales, car parking and caravan charges in forest parks.

13. The net monetary benefit of the forestry programme is therefore £5m annually. There is potential to increase this through capturing greater value added in wood processing, increasing tourist and other visitor numbers and reducing costs.

14. The profitable use of private woodlands is likely to remain a challenging aspiration. Responses to the *Forestry in Northern Ireland* consultation paper showed that forest owners are conscious of the economic consequences of owning forests and are concerned about the lack of profitability in the sector. Wood production is the main economic activity in large private forests, followed by sporting interests. Many private forests produce no monetary

return but are valued by their owners for improvements to the environmental quality of their property.

15. The major non-monetary benefits of forests are improvements to quality of life as expressed by the contribution made by forests to mitigating the effects of climate change, biodiversity and landscape quality. The major adverse non-monetary impact of forestry has been damage to peat land ecosystems, which may be reversible by removing forest and encouraging restoration of bogs. In response to the *Forestry in Northern Ireland* consultation paper, environmental, community and recreational interests argued that current policy favours timber production too much, and public opinion surveys suggested that non-wood production issues such as environmental protection and recreation were the main reasons why forests should continue to receive public funding.

16. This is an important change in the attitude towards forestry and the *Forestry Act* needs to reflect the changed priorities. The *Act* should reflect the need to balance the different, sometimes competing, objectives of wood production, public enjoyment of forests, and to protect and enhance forests and associated habitats and species. Importantly, the *Act* should provide the Forest Service with the flexibility to develop its property to meet wider priorities and respond to opportunities to secure general development benefits. For example, the Service should be able to allow the development of forests to promote environmental tourism, wind farm development, or other commercial development subject to the statutory planning processes. Where property leases contain terms that prevent it from fulfilling its full range of duties the Service will consider surrendering those leases. The Service will also consider the scope for disposal of forests where these are not delivering sufficient public benefits, or where this would improve its effectiveness and efficiency.

17. Forests produce timber, they provide environmental gains and opportunities for public access. The key uncertainty is how changes needed to the *Forestry Act* can control the potentially adverse effects of forests such as environmental degradation and loss of biodiversity.

Question 1.

Is there public support for the proposal to change the statutory basis for the existence of the Department's forests?

Public access

18. Surveys show that 77% of Northern Ireland households visit forests at least once each year. 17% visit more than once a month. Tourists spend 40% of day visits in forests, country parks or gardens. The Forest Service estimates that there could be as many as 8 million visits each year to woodland in NI, of which a quarter go to Forest Service properties. A large majority of visitors come to walk. The Forest Service view is that forests provide important public benefits for the NI population and also a rich environmental place to visit, but there is scope to encourage more people to take regular exercise in forests and to establish new forests near to urban areas for this reason.

19. Visitors expect that the forest landscape will be interesting, varied and sympathetic to environmental issues. They expect a high standard of customer care, including a face-to-face service to handle queries and resolve difficulties, access to car parks, toilets and visitor information, and that they will be safe. Where reception facilities and cafes are provided, they are expected to reflect modern tastes, and be interesting and innovative. Most of the costs associated with these activities are focused around visitor reception areas and entry points. The costs of a substantial volume of access on foot over very large areas of Forest Service forests are likely to be very small and the view of the Service is that there is a strong case for continuing to encourage low impact usage of these forests.

20. Where access to forests can be strictly controlled or a valuable service provided directly to visitors, the Forest Service considers that visitors should be charged directly for this to recover costs. However, charging is often impractical because demand is seasonal and weather dependent, in most cases access cannot be effectively controlled, and it is not cost effective to maintain a full time staff presence. Often the value of an individual visit is very low and there would be a high degree of charge avoidance. For these reasons the Service accepts that costs are likely to exceed income and there will be a continuing need for public support to underpin public access to its forests.



21. The absence of a charging mechanism or other means of attributing value to visits means that forest managers have difficulty in balancing the emphasis to be given between public access and timber production. It is important that they are able to do this to help them allocate public resources efficiently and for this reason the Forest Service intends to develop a more transparent method of funding forests.

22. The Forest Service view is that it should continue to manage forests and acquire land that will enable it to complement the policies of local authorities to promote tourism and public access to the countryside. **To support this the Service intends to create a statutory right of access on foot to its forests, while limiting liability towards people exercising this right of access.** Any right of access so created should transfer with the land if the property is subsequently transferred out of the public sector. **Legislation should also provide powers compulsorily to acquire privately held rights of use over Forest Service forests to reduce the risk from conflicting uses.**

23. Responsibility for tourist development rests in the first place with local authorities. Also within their remit is responsibility for determining public rights of way and the provision of leisure facilities. Clearly these activities are closely related to public access to forests and the potential exists for a more integrated approach should responsibility for managing public access within Forest Service forests be devolved to local authorities. The Forest Service view is that local ratepayers are likely to be the main users of its forests and the most likely beneficiaries of increased opportunities for recreation and tourism, and so would be best placed to ensure accountability by a local authority. **The Forest Service therefore proposes that responsibility for maintaining and developing access to its forests should transfer to local government.** To offset the costs, the Forest Service would introduce arrangements for the transfer of its existing public access resources to local authorities. Those authorities would be able to negotiate with the Service their own arrangements for developing and controlling access within these forests. The Service would have the duty to balance the requirements of local authorities with other forestry objectives.

Question 2.

Will the proposals to transfer responsibility and resources for public access to local authorities improve the arrangements for access to forests?

Amount of forest

24. The responses to the *Forestry in Northern Ireland* consultation paper and the *Public Opinion Survey* in 2003 provide evidence of a strong public interest in substantially increasing the amount of woodland in NI (82% of respondents to the *Survey* agreed with this). The case for this was tested in the economic appraisal, which found that the main benefits from this would be in terms of landscape and environmental improvements, especially where these provide increased opportunities for public access close to urban areas. The appraisal also found that once forests have been created, there was likely to be significant economic activity in processing the timber although this would obviously not take place until the new forests were more mature. The significance of this conclusion is that care should be taken in establishing new woodlands to ensure that timber production options are created and passed on to succeeding generations.

25. The principal reason why there is now limited public sector afforestation is because land has become too expensive and, when land is now acquired, it is to consolidate small blocks of woodland into larger blocks and provide general improvements to landscape design, environmental quality and access.



26. Private sector afforestation comes mainly from land released from agriculture, principally conacre. This accounts for one third of all agricultural land and grant aid is provided to encourage private planting. It should be noted that proposals within the draft Rural Development Regulations from the European Union (EU), which are due to come into operation in 2007, may reduce the level of direct grant aid and the Service will have to consider how it might alternatively assist in the further development of private woodlands.

27. The Forest Service is also keen to promote development of renewable energy resources within the private sector and one approach being tested is an invitation to landowners to bid competitively for delivery of Short Rotation Coppice plantations. Additionally there is increasing public and corporate awareness of the value of trees in removing from the atmosphere the CO₂ emissions resulting from electricity generation, and the Service will work with others to pursue opportunities for carbon sequestration in Northern Ireland.

28. If private sector forest expansion is to continue, then it needs to complement agricultural policy. The reform of the EU Common Agricultural Policy (CAP) is progressing and reduced emphasis on crop and animal production may release land that could be used for forests. The main attractions of forestry for farmers are its potential to deliver environmental improvement under comparatively simple management and to accumulate value in growing timber for future generations. This allows landowners an opportunity to retain an active interest in managing and enjoying their property while releasing some of their own time to carry out other economic activity.

29. To assist in this process, the Forest Service aims to provide strategic information and advice that would lead to better, quicker decisions consistent with sustainable land use and **proposes achieving this in co-operation with other agencies by publishing maps showing where afforestation is to be encouraged**. These maps will be revised from time to time to take account of changes to habitat condition. This will reduce the burden of consultation in relation to individual proposals, ease the process of proposed afforestation and provide greater assurance that afforestation is environmentally desirable.

30. The Forest Service has concluded that its current strategy should continue to encourage afforestation by the private sector of land which would otherwise be offered for conacre and this should proceed at a pace that complements progress on CAP reform. The Service therefore plans to maintain incentives at a level comparable to conacre rents, subject to any new restrictions required by the EU and the proper use and availability of public funds. Forest Service afforestation through purchase of privately owned land will only be pursued where there is a clear public interest in doing so. This is most likely to be the case when consolidating existing forests or to secure improved public access. **The Service will also consider whether it should seek powers compulsorily to purchase land for afforestation in these circumstances** but believes that it would use these powers very rarely.

Question 3.

Do the proposals for future afforestation provide an appropriate balance between encouragement of forest expansion, the needs of agriculture and protection of the environment?

Biodiversity and the environment

31. Forests are one of the world's major ecosystem types. Ireland is part of the temperate deciduous forest biome but only fragments of semi-natural woodland remain. 1000 ha of old woodland have been designated as having nature conservation importance. These and other woodlands, including younger semi-natural woods and commercially managed coniferous plantations, provide favourable habitat for those species that are adapted to woodland including specialists such as pine marten and red squirrel and some generalist species including otter, merlin and hen harrier. In the case of red squirrel, conifer plantations allow the species to compete with introduced grey squirrels. On the other hand, forest expansion also provides favourable habitat for invasive species such as rhododendron and Sika deer.



32. Deer populations are likely to expand significantly as domestic grazing pressure declines on land adjacent to forests. This will have a favourable impact on sporting interests and an adverse impact on the success of forest regeneration, biodiversity action plans, agricultural animal disease control strategies and road safety. Escape of farmed deer and other woodland species are likely to occur and may lead to new wild populations. **The Forest Service proposes amending the *Forestry Act* to provide powers to monitor and, if necessary, control deer and other large mammal populations so that forests can be maintained at sustainable levels.**

33. Forests change little from year to year, and the main opportunities to influence change in forest structure or species composition come when new forests are planted or existing forests are harvested. Although timber production has a high impact on forest environments, measures have been developed to mitigate the impact of harvesting and allow as much timber production to take place as possible while protecting species diversity.

34. Continued poor timber prices may stimulate landowners to seek alternative economic uses of forests (e.g. recreation and tourist development) or to place greater reliance on natural processes to achieve restocking after harvesting, storm damage or fire. This may change the character of forests and affect their capacity to regenerate. The response to similar pressures in many countries has been to regulate the way in

which forests are managed. **The Forest Service therefore proposes to seek powers to specify the conditions under which tree felling will be permitted, and to seek powers to secure forest regeneration.** However, the Service also wants to assure forest owners that in framing the legislation, it will seek provision to recognise the value of the steps already taken by the industry so that costs are not excessive where good practice already exists. The existence of a regulatory measure would also facilitate the transfer of Forest Service forests to the private sector by providing the means to enforce action to ensure the continued survival of transferred forests.

Question 4.

What aspects of tree felling and forest management should be controlled through regulation?

Timber production, forest regeneration, and public roads.

35. Timber production supports development of the NI economy and remains an important objective of forestry policy. To support this the Forest Service has developed contracts for the sale and supply of timber from public forests up to 2009, and there is potential to increase production provided it is economic to do so while meeting other policy objectives.

36. Wood is an internationally traded commodity and the price of timber is only marginally affected by the supply and demand for home grown timber. Improvements in public sector marketing arrangements have produced price stability mainly due to lower transaction costs. The future however is likely to be dominated by low cost supplies of imported timber, and further improvements in competitiveness have to come from cost reduction in forest management and supply chain management. The major cost elements in getting timber to sawmills are the costs of harvesting timber, regenerating plantations after harvesting, improving the capacity of forests to yield timber, and timber haulage. The Forest Service will continue to seek sustainable cost reductions that require less intensive forest management and to offer advice and assistance to private woodland owners to secure the regeneration of privately owned plantations.



37. The geography of NI and the pattern of land use mean that there is no realistic alternative to using minor public roads for timber traffic, and costs of repair are increasing. Sections of these roads will require upgrading and repair to allow safe use and ways need to be found that are affordable while making appropriate allowance for other road users. The Forest Service proposes that forest owners should become responsible for upgrading and repairing minor public roads damaged as a result of forestry activity. This will provide an incentive to woodland owners and the timber industry to minimise damage and cost. The Service will take the lead in working with the Roads Service, private woodland owners and others to seek strategic solutions that reduce the impact of forestry operations on public roads, and in revising timber industry codes of practice

that aim to improve road safety and reduce costs for roads authorities and road users. To achieve the necessary changes and contain costs **the Forest Service will seek new powers to carry out road works on public roads to complement the provisions of the *Roads (Northern Ireland) Order 1993***. It also proposes to recover costs from private woodland owners to the extent needed to discharge their responsibility for damage to public roads, and to acquire land through vesting to secure effective arrangements for improving roads and gaining access to forests.

38. The Forest Service also proposes that a programme should be drawn up to identify opportunities to reduce the use of public roads by building forest roads and to identify and abandon those little used minor public roads that almost exclusively service forests.

Question 5.

What other measures are required to secure timber production, ensure forest regeneration and equitable use of minor public roads?

Analysis of equality implications

39. Schedule 9 of the *Northern Ireland Act 1998* requires an assessment of the likely impact of policies on the equality of opportunity in so far as these relate to certain categories of people. These categories, generally referred to as the Section 75 groups, are defined in Section 75 of the *Act* as persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation; men and women generally; persons with a disability and persons without; and persons with dependants and persons without.

40. The *Northern Ireland Act* also requires that public bodies must have regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial group.

41. A draft Equality Impact Assessment of the current policies, programmes and activities, based on existing data and information obtained by the Service, has been prepared and is attached to this consultation document for comment by interested parties.

42. Recognising this, the Forest Service is taking steps to mitigate differential impact in the delivery of recreation services through the introduction of capital and maintenance works programmes within its forest parks and recreation areas, such as improved access, toilet and visitor facilities for the benefit mainly of disabled and older people. Concession charges were introduced for vehicular access to parks for the over 60s to facilitate access. Further improvements are desirable to encourage greater use of forests, for example by improving visitor signs and information boards, and better communication of marketing material and publications generally. The Service further recognises the need to introduce enhanced data collection systems to assess more accurately the level of uptake and the needs of Section 75 groups in relation to its provision of services.

Question 6.

How consistent is Forest Service's preliminary analysis of the equality implications of its policies with the experience of people within any of the Section 75 groups?

Equality Impact Assessment of **FORESTRY POLICY**

Consultation Paper

December 2004



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EQUALITY IMPACT ASSESSMENT OF FORESTRY POLICY

1. INTRODUCTION

1.1 Section 75 of the Northern Ireland Act 1998 requires all public authorities in carrying out their functions relating to Northern Ireland (NI) to have due regard to the need to promote equality of opportunity :-

- between persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation;
- between men and women generally;
- between persons with a disability and persons without; and
- between persons with dependants and persons without.

These categories are generally referred to as the Section 75 groups.

1.2 In addition and without prejudice to the above obligation, public authorities must also, in carrying out their functions relating to NI, have regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial group.

1.3 The Department of Agriculture and Rural Development's (DARD) Equality Scheme commits it to carry out an Equality Impact Assessment (EQIA) on policies relating to access to forests for recreation and educational purposes within the first year of the operation of the Scheme. However, in light of a major review of forestry policy, the Department deferred completion of the EQIA until the revised policy proposals for forestry development had been formulated. These proposals are contained in the attached Consultation paper.

2 AIMS OF THE EQIA

2.1 The EQIA aims to identify whether existing policies and identified options for future forestry policy in NI could potentially create differential impacts between Section 75 groups, or has the potential to enhance equality of opportunity between such groups.

2.2 This Assessment is based on available data of the relationships between forestry policy and Section 75 groups and contains proposals to mitigate adverse

impact of policies and enhance equality of opportunity for any affected group. Policies have also been examined to assess impact on the promotion of opportunity or the duty to promote good relations using the following criteria :-

- Is there any evidence of higher or lower participation or uptake by different groups?
- Is there any evidence that different groups have different needs, experiences, issues and priorities in relation to the particular policy issues?
- Is there an opportunity to promote equality between the relevant different groups, either by altering the policy, or by working with others in government or the larger community, in the context of the policy?
- Have consultations with relevant groups, organisations or individuals indicated that policies of that type create problems specific to any relevant group?

3 BACKGROUND TO FORESTRY

3.1 Forests in NI cover about 6% of our land area, which represents an area of around 80,000 ha. 80% of forests are state owned, and half of these lie in counties Tyrone and Fermanagh. Taken together, the forests produce timber, contribute to improving and protecting our environment, and are a principal means of public access to the countryside.

3.2 Forestry policy, which flows mainly from the UK's international obligations on forestry and current government policy on sustainable development, may be defined as :-

- The promotion of the sustainable management and development of all forests and woodlands;
- The gradual expansion of forests and woodlands as a contribution to global strategies for combating climate change and addressing other forestry issues in a way that delivers benefits to NI.

3.3 The statutory base for the development of forestry in NI lies principally in the Forestry Act (Northern Ireland) 1953. Responsibility for the implementation of forestry policy rests with the Forest Service, an agency of DARD.

3.4 The forestry sector is closely linked with the wood processing sector, with NI sawmills processing 80% of the timber harvested here. Two of the largest sawmill groups in Ireland are located in NI. The largest companies have mills in Enniskillen, Limavady and Coleraine, and there are smaller mills serving local and specialist markets elsewhere. The annual output of the forestry sector in NI is £18m of value added within NI by the wood processing industry producing sawn wood, sawmill co-products and chipboard. Employment in the wood processing sector in NI is around 1,000 people, with a further 6,000 people employed in NI in secondary processing, which includes furniture manufacturing, building and carpentry.

3.5 Each year Forest Service supplies 400,000 cubic metres of timber. The wood processing industry relies on the continuity of supply available from public owned forests. The Service supplies about 40% of the NI industry requirements; a similar volume comes from a state owned company in the Republic of Ireland and the balance from private growers on both sides of the border and imports.

3.6 The impact of timber production from forests on the NI economy is relatively small. It does however contribute valuable employment and multipliers, particularly in rural areas and to local economies, especially in the west and in border areas where timber production and processing is concentrated. The production and supply of wood from within NI for industrial use engages the Forest Service in the following ways :-

- Acquiring land that is suitable for growing timber and in close proximity to primary customers.
- Establishing and maintaining forests to published standards of good practice.
- Harvesting timber for sale.
- Replacement of forest after harvesting.
- Tendering and agreeing contracts with buyers.
- Providing grant aid for private planting and maintenance.

3.7 In addition, forestry policy also includes the role of forests as areas of recreation, education, healthy living and social development. These aspects of policy are also explored and assessed in this EQIA.

4 FORESTRY POLICY OBJECTIVES AND ACTIVITIES

4.1 This section provides an explanation of the five **existing** core Forest Service policy objectives and the activities which the Forest Service undertakes to support those policies.

4.2 The five existing core policy objectives are: -

Objective A: To at least maintain the capacity of existing forests to sustain future stable levels of industrial activity in the NI forestry and wood processing sector.

Objective B: To encourage the transfer of up to 1% of land (20,000 ha) from agricultural use to forestry.

Objective C: To improve the contribution that forests make to the quality of the environment.

Objective D: To increase the contribution that forests make to social welfare through access to forests for recreational and health giving exercise.

Objective E: To increase the contribution that forests make to educational development.

4.3 Objective A & Objective B:

4.3.1 The Forest Service achieves an expansion of the area of forest by about 700 ha each year by afforestation of agricultural land, almost entirely through private planting aided by grant schemes. Thus the impact of this activity on Section 75 groups is manifested in the way in which the schemes are applied, or on the levels of uptake of the grants. There are two grant schemes operated by the Service, both of which are part funded by the European Union.

- **The Woodland Grant Scheme** offers two groups of establishment grants towards the cost of establishing and maintaining woodlands. Establishment grants are designed to assist new planting, restocking and natural regeneration. The Woodland Improvement Grant and Sustainable Forestry Operations Grant are available for existing woodlands, to bring them back into sustainable management and secure environmental, social and economic benefits. To qualify for these grants woodlands must be at least 0.2 ha in area and 20 metres wide. Applicants must also undertake to maintain woodlands with good forestry practice for a prescribed number of years.

- **The Farm Woodland Premium Scheme** offers annual payments to compensate for agricultural income foregone. Annual payments are made for 10 or 15 years, depending on the trees planted and how they will be managed. The rates of payment depend on the category of land planted and whether or not this falls within or outside the Less Favoured Areas (LFA).

Under both schemes Forest Service paid out £1.64 m in 2003/04. Funding was available to meet all qualifying applications for grant.

4.4 Objective C:

4.4.1 On a world scale, forests help to counter the effect of global warming. Forests in themselves are an important ecosystem. They are also important because they interact with other parts of our environment in significant ways. Forests impact on habitat and species conservation, built heritage, landscape, water and other environmental attributes. Woodlands close to urban areas offer opportunities to screen development, define settlements and integrate urban land use with rural land use. There is a deficit in urban forest provision of about 2,000 ha throughout NI.

4.4.2 The Service's activities centre on :-

- The protection and restoration of ancient woodland sites, enhancement of the biodiversity value of woodland, consolidating the most important woodland habitats and linking woodland and other habitats together.
- Increasing the area of broadleaved woodland.
- Improving the quality of the landscape through new planting and replacement of existing forests, embodying high standards of design.
- Support for the management of ancillary open land and the built heritage.
- Increasing the effectiveness of the controls on the introduction and spread of exotic forest species.

4.5 Objective D:

4.5.1 Encouragement of access is driven principally by recognition that forests serve to enhance the range of opportunities for leisure and exercise in the countryside, and offer increased opportunities for the development of tourism in NI, especially in rural areas. There are about 8 million visits each year to state owned forests and parks by NI residents and overseas visitors, of which approximately one quarter visit Forest Service forests. The Service maintains an open access policy for members of the public who are encouraged to make use

of over one hundred forests for a variety of recreational and educational activities. Visitors include day-trippers, walkers and specialist sport enthusiasts. In most cases access is free, but in those areas, mainly in forest parks and other heavily used sites, where specific facilities have been provided such as parking, toilets and cafes, a charge is made to help recover costs. Charges are also made for “commercial” recreation e.g. camping and caravanning and special events.

4.6 Objective E:

4.6.1 Forests offer an important natural resource ideally suited for education, particularly of children, on environmental issues and sustainable development. The main users for guided school visits are primary school children at Key Stage Levels 1 and 2, of which there are around 6,000 each year. Forest Service has had direct input into the development of the content provided within these educational visits. Older children and young adults (Levels 3, 4 and tertiary education) have a reduced demand for specialist forest guides, but do use the forest resource for specific curriculum based activities and life long learning. Group activities led mainly by youth services, uniformed youth organisations and schools account for visitor numbers in the region of 100,000 each year.

5 ASSESSMENT OF AVAILABLE DATA AND RESEARCH

5.1 Each of the five Forest Service objectives outlined above was considered against available data and research.

5.2 Objective A:

5.2.1 Grant aid is provided for the development of private woodland on the basis of information submitted within an application form and a decision to provide grant aid will be made where the application is properly completed and supported, and where the application meets the criteria of the Scheme. Largely these criteria are concerned with the area and suitability of land. Grant aid is provided mainly, but not exclusively, to farmers.

5.2.2 It is possible to obtain useful indicators on the uptake of the grants by data drawn from the Department’s Social Survey on the impact of its policies on Northern Ireland’s farming community that was completed in July 2002. By examining whether or not the area of land which was the subject of grant fell within the Less Favoured Area¹ (LFA), which comprises Severely Disadvantaged Areas (SDA) and Disadvantaged Areas (DA), or Lowland some conclusions can be drawn about the

levels of uptake by at least a number of the Section 75 groups. Since 2000/2001 the percentage of farming land subject to grant was as follows -

Land Category	% uptake of grant (area)
SDA	42.6%
DA	31.3%
Lowland	26.1%

5.2.3 *Religious belief*

The Social Survey indicated that of all farms in NI 54% were owned by Protestants, and 44% by Catholics. There were distinct differences in the community background of farmers by type and size of farm. Farmers in the SDA were predominantly Catholic, those in the DA broadly 50:50 and in the Lowland predominantly Protestant. Given that the area of land subject to forestry grant has been greatest in the SDA this would suggest, in the absence of other data, that a higher proportion of Catholics received forestry grants.

5.2.4 *Political opinion*

The Social Survey did not seek data in respect of the political opinion held by the farming community. However, assuming that the voting preference of LFA farmers are broadly representative of those across the District Council areas in which they are located there is a significantly higher proportion of Nationalist farmers in the LFA than is true of NI as a whole. This would indicate, in the absence of other data, that there may be a higher uptake of forestry grants by Nationalist farmers.

5.2.5 *Racial Group*

The Social Survey indicated that the farming population was overwhelmingly white and there was no difference in racial group by type or farm size. This would suggest a similar balance in grant uptake. The Department considers that the forestry grants policy has a neutral impact on non-white racial groups.

5.2.6 *Age*

The Social Survey showed little variation in the age of farmers across the LFA and Lowland and this would suggest that uptake in forestry grants across the farming community is reasonably balanced.

5.2.7 *Marital Status*

The Social Survey reported that 73% of farmers were married, 20% single and 7% separated, divorced or widowed. Farmers within the SDA were least likely to be married. The total area subject to forestry grant was greatest in the SDA. The Department considers that because forestry grants are open to all regardless of marital status no action is required.

5.2.8 *Sexual Orientation*

The Social Survey did not collect information on sexual orientation and no further information is available. It is considered that forestry grants schemes will not impact differentially due to an applicant's sexual orientation.

5.2.9 *Gender*

Farms are predominantly male owned, with little difference in gender ratio between different sizes or types across LFA and Lowland. Forestry grants are open to all and the Department considers that current policy does not adversely impact on people according to their gender.

5.2.10 *Disability*

The Social Survey indicated that, while a high proportion of farmers (27%) suffered from a long standing illness or disability, there was relatively little difference by farm type or size. This would suggest that the forestry grants policy does not adversely affect those with disabilities.

5.2.11 *Dependants*

The Survey indicated that 73% of farm households included one or more dependants. It concluded that there was no significant difference in numbers of dependants by either type or size of farm. The Department considers that the Forestry Grant Schemes have a neutral effect on persons with dependants.

5.2.12 *Other sources of information*

The Review of Forest Policy in 2002 presented a formal opportunity for all the Section 75 groups to advise of policies or programmes that created difficulties for them. Of the 70 or so organisations representing Section 75 interests invited to comment, five responded. None of these referred to the issue of grant aid or any other aspect of the Service's activities associated with the production or supply of wood.

5.3 Objectives B and C:

5.3.1 Forest Service believes that the activities undertaken in meeting these objectives will have a positive impact on all NI citizens and hence all of the Section 75 groups.

5.4 Objective D:

5.4.1 DARD has in recent years acquired mainly qualitative data from a number of sources (which are referred to in subsequent paragraphs) on the use or lack of use

of Forest Service forests for recreational purposes by some of the Section 75 groups. This is considered below.

5.4.2 *Religious belief*

A marketing survey completed in 1993² reported few significant differences in participation and attitude by religion, and there has been no subsequent data collected by Forest Service.

5.4.3 *Political opinion*

Data is not collected on the political opinion held by forest users. In addition, no meaningful relevant data or research has been identified.

5.4.4 *Racial Group*

Data is not collected in relation to the racial groupings of forest users.

5.4.5 *Age*

Profiles of users of forests carried across a number of surveys have identified the following representation. A 1998³ marketing survey identified that the least represented age groups visiting forests were the 13-18 years age group and the over 65 years age group. A 2001 report on access and recreation⁴ within the forest estate produced indicators that the main forest users were informal groups of adults, organised parties of children and adults, and families. A community consultation, included within the 2001 access and recreation report, revealed that the following groups were considered to be prevented from using forests, with examples of reasons given :-

- | | |
|----------------|---|
| • Young people | No organised visits; no public transport. |
| • Elderly | Few seats, few refreshments and toilet facilities and some steep paths. |
| • Pensioners | Perceived high admission charges for regular use. |

5.4.6 Age profiles within the formal sporting/recreational groups showed orienteers to be from 7 to 70 years of age, ramblers mainly in middle age or retirement, and three quarters of NI Motor Club users between 19 and 65 years of age. Respondents to the Department's public consultation paper 'Vision into Practice' indicated that targets were needed for signage communication and information formatting for elderly people in general. However, the *DARD Customer Service Review 2004* reported 78% satisfaction with existing signage within forests. The Review also found that 19% of respondents wanted improved facilities for children and older people.

² Report of visitors to Forest Service Parks 1993, Ulster Marketing Surveys Limited. ³ Ulster Marketing Survey Ltd 1998

⁴ Access and Recreation Review, February 2001. Judith A Annett-Countryside Consultants.

5.4.7 *Marital Status*

No relevant data or research has been identified.

5.4.8 *Sexual Orientation*

No relevant data or research has been identified.

5.4.9 *Gender*

The Access and Recreation Review reported that most formal regular user groups are either balanced in terms of gender or have a slightly male bias. Exceptions to this are those who lease and exercise shooting rights and those who use forests for participating in or viewing car rallies, most of whom are male.

5.4.10 *Disability*

The Access and Recreation Review community consultation process identified people with a disability as being prevented from using forests because of inaccessible facilities. Those with disabilities were under represented, with specialist user groups recording in the main fewer than 5% amongst their membership, and little or no specialist provision being made for the disabled casual user.

5.4.11 Suggestions made to improve facilities and services included levelling paths and ramps, providing more accessible toilets and information. A number of respondents to '*Vision into Practice*' expressed the opinion that targets to improve facilities and services for disabled people were needed. The DARD Customer Service Review however revealed 83% satisfaction at the provision and maintenance of pathways reflecting increased expenditure in this area in 2003/04 of £1.6m.

5.4.12 *Dependants*

Data is not collected on persons with or without dependants who use or do not use forests. However, the experience of Forest Service staff suggests that families and those with dependants make significant use of forests.

5.4.13 *Other sources of information*

The organisations representing Section 75 interests who responded to the 2002 consultation expressed the following views :-

- Charging for access to forest parks conflicts with inclusiveness policies.
- Forest Service should support and promote active and healthy living projects for children.

- Forest Service should set up a Children's Forestry Forum to listen to the views of children.
- There should be improved participation of Section 75 groups.
- More family friendly facilities should be provided in forest parks and forest recreation areas.
- Festivals to celebrate a wide range of cultural diversity should be organised on appropriate dates in the forests.
- When access for disabled people is included at the start of planning, all society benefits, especially elderly people and those with dependants.

In addition a number of organisations representing countryside/recreation interests expressed the view that barriers to access to state forests included distance of travel, lack of transportation, admission charging and the under provision of facilities and services for disabled people. The majority of respondents were however of the opinion that sensible levels of charging, linked to the availability of facilities and services on site, including car parking, were appropriate. Appropriate concession charging in line with social inclusiveness policies was supported as a means of encouraging access.

5.5 Objective E:

5.5.1 The Department has in recent years acquired mainly qualitative data from a number of sources (which are referred to in subsequent paragraphs) on the use or lack of use of Forest Service forests for educational purposes by some of the Section 75 groups. This is considered below.

5.5.2 *Religious belief*

A 2001 report on Forest Service's education service provision⁵ revealed an under representation of Catholic Maintained Schools compared with Protestant schools in organised visits to state forests. Data collected by the Service over the period 1st April 2003 - 31st March 2004 continued to point to an under representation of Catholic Maintained Schools in two of the Service's three NI Districts.

5.5.3 *Age*

The Forest Service Education Report 2003/04 shows that the number of education visitors on guided forest tours was 10,250, with just over 50% of these being primary school groups. Approximately 20% of the education visitors were not on school organised trips, and these visitors cover a wide spectrum of groups that includes young and old visitors participating at educational events.

⁵ Forest Service Education Review, Graduate School of Education, Queens University of Belfast, March 2001.

5.5.4 *Disability*

The Forest Service Education Report indicated that there was a relatively low participation of pupils from special schools compared to mainstream schools. Data collected by the Service during the period 1st April 2003 –31st March 2004 also indicates an under representation of special schools in organised visits to state forests, for example only 8 school visits out of 241 to all forests were made by Special Needs schools (3.3%).

5.5.5 *Other sources of information available*

From its own sources Forest Service is also aware that there is a significant number of guided visits made by youth groups and non-guided visits made by schools each year, but data currently held in respect of these visits does not allow for determination of the Section 75 composition of the groups involved.

5.5.6 There is no data available under the headings of *Political Opinion, Racial Group, Marital Status, Sexual Orientation, Gender, and Dependants*.

6 SUMMARY OF IMPACTS OF FORESTRY POLICY

6.1 Overall, Forest Service considers that its policies have a positive or neutral impact on the Section 75 groups, however some areas have been identified that require action.

6.2 From the findings of the recently published DARD Social Survey there is the likelihood of some differential impact affecting Protestants in terms of the level of uptake of forestry grant schemes. This is based on the locations and areas of the farmland concerned, which fall predominantly into the Less Favoured Area. The schemes are designed to offer increased opportunities for landowners to plant trees as an alternative form of land use. Apart from land ownership, criteria for grant and level of grant is related to area and location of land and conditions regarding preparation and management of planted land. All applications that have met the qualifying criteria have continued to be approved for grant aid on a first come first served basis and there has been no necessity to introduce qualifying criteria which might serve to create adverse impact. It is difficult to see how any action the Forest Service could take would be able to change this.

6.3 Evidence exists to suggest that there are lower levels of participation or that there are different needs in relation to access to and use of services and facilities within Forest Service forests for people with disabilities and people of different ages.

For example :-

- Recent surveys indicate that people with disabilities are under represented and hindered from using forests because of lack of adequate forms of signage and information, physical access and facilities such as level paths, ramps and accessible toilets.
- Recent surveys indicate that people in age groups 13-18 and 65+ are least well represented in using forests because of the unavailability of people to organise their visits and transport (former group) and perceived high admission charges, inadequate information signage, rest, toilet, refreshment and walking areas (latter group).

6.4 Forest Service acknowledges that there is under representation by Catholic Maintained and Special Schools in guided visits to its estate.

7 CONSIDERATION OF MITIGATING MEASURES

7.1 Forest Service has given consideration to the measures that have already been taken or might be taken to eliminate or at least mitigate the adverse impacts that have been identified in the previous sections of this report.

7.2 Forest Service recognises that it has limited data on which to base its conclusions and in some cases that data is dated. To mitigate this, the Service proposes a full involvement in a UK Public Opinion Survey in relation to forest use where previously the Service's involvement has been more limited. The Service will also consider supplementing the Survey by gaining qualitative information on a less formal basis that is representative of each of the Section 75 groups.

7.3 In respect of **access to forests for recreation**, the Forest Service has embarked on a series of measures, particularly over the last two years, aimed at mitigating adverse differential impact and promoting equality of opportunity for people with disabilities and people of different ages within its forest estate. These have included the provision of wheelchair access facilities to visitor areas, disabled car parking, toilets, picnic tables and user friendly paths at a number of forest parks and recreation areas. From the beginning of 2002 the Service introduced concession charging for annual vehicle permits for the over 60s. Initially the focus has been on improvement of the more frequently visited forest parks, however the improvement of facilities and services will now be considered on a wider scale.

7.4 Forest Service also recognises that there is scope to improve communication and information signage at many of its forests, which should enhance

services for people with disabilities and for people of all ages. In developing improved signage and information and access to its forests, the Forest Service has worked closely with Disability Action and the National Institute for the Blind, and also with Shopmobility in the design of the Peace Maze at Castlewellan.

7.5 In addition Forest Service accepts that many of the forms, marketing material, and other publications for which it is responsible could be made more user friendly. Positive measures are being made in terms of providing an improved service for disability groups accessing its information via the Internet, for example the Service is aiming to gain accreditation as part of the 'Web Accessibility Initiative', an award recognised within the information technology industry.

7.6 In respect of the impact of the **education service**, this has been delivered primarily by reacting to requests from schools and Education and Library Boards for forest visits. In part, due to the findings mentioned, the Service has become more pro-active in liaising more closely with the education authorities aimed at promoting equality of opportunity for under represented groupings. The Forest Service Education Report 2003 demonstrates that the gap is closing between Protestant and Catholic Schools in terms of guided educational forest visits. The Service aims to continue this trend and to introduce improved data collection and information systems to assess more accurately the level of usage and needs of Section 75 groups. The Service will contact the appropriate representative organisations in order to discuss available options aimed at improving the visiting numbers of pupils from Special Needs and Catholic Maintained Schools.

7.7 The **policy options** set out in the attached consultation document have also been considered in respect of their potential impact on Section 75 groups. These options, if accepted, will result in a revision of the Forestry Act (Northern Ireland) 1953 and is viewed by Forest Service as demonstrating a holistic approach to meeting all objectives, with the potential to positively impact on all the Section 75 groups due to the creation of a stronger customer driven focus.

7.8 The policy options of creating a specific right of access and the transfer of responsibility for public access to local authorities will desirably give the public more influence in the development of future recreation opportunities in their locality. The dissemination of controls to a local level arguably allows for a more tailored approach to be adopted as to the needs of the immediate population and the development of appropriate opportunities to attract tourists to forested areas.

8.1 The Forest Service is committed to promoting equality of opportunity and the development of policies and practices that demonstrate this commitment. The Service recognises that there is a need to introduce improved and new data collection and information systems to more accurately assess the level of usage and the needs of Section 75 groups in respect of forest recreation and education.

8.2 It is hoped that organisations and individuals that have an interest in the impact of forestry policy and practice on Section 75 groups will offer comments in response to this paper. This will aid the assessment of and decisions on measures to eliminate or mitigate adverse impact. Following consultation the final report including the results of the Equality Impact Assessment will be published and made available on the Forest Service web site at www.forestserviceni.gov.uk and the DARD web site at www.dardni.gov.uk

9 HOW TO RESPOND TO THIS CONSULTATION DOCUMENT

This Equality Impact Assessment is subject to a formal consultation process. The Department will consider and respond to all the comments received during the consultation process. The following questions may assist you to take part in the consultation, but you are invited to submit your views in any format :-

- **Are you aware of any other data or information that might be drawn upon to assess the equality impact of forestry policy?**
- **Do you feel that the assessment of existing policy made at Section 5 is fair and accurate? If not, please elaborate.**
- **In light of the assessment of impacts, do you agree with the suggested mitigating measures at Section 7?**
- **What other measures or alternative policies would you propose that would better promote equality of opportunity?**
- **How do you feel the policy options suggested in the attached consultation document will impact on Section 75 groups?**
- **Do you have any other comments on the equality impact of forestry policy?**

The closing date for comments is 31st March 2005 and these should be sent to-

William Webb

Forest Service Headquarters

Dundonald House

Upper Newtownards Road

Belfast BT4 3SB

Telephone: 02890524293

Text Phone: 02890524420

Fax No: 02890524380

E-mail: william.webb@dardni.gov.uk

The EQIA paper is also available on the Forest Service web site at www.forestserviceni.gov.uk/consultations. You may also respond electronically by accessing the response link in the web site or mailing your comments directly to william.webb@dardni.gov.uk. If you would like to meet in person to discuss any of the equality issues raised within this document please use the contact details above in order that the necessary arrangements can be made. The consultation document '*Options for Forestry*' will also be available on the Forest Service web site at www.forestserviceni.gov.uk/consultations and on the Central Consultation Register for Northern Ireland Departments web site at www.consultationni.gov.uk

Copies of this document can also be made available on request in alternative formats e.g. in large print, Braille disc, audiocassette and other languages. For copies please contact the branch at the above address, by telephoning 028 9052 4293 or by textphoning 028 9052 4420.

A list of those organisations representing Section 75 interests and other stakeholders is listed in the Appendix.

APPENDIX

Section 75 Interested Parties and Stakeholders

ORGANISATIONS & INTEREST GROUPS	
Age Concern Northern Ireland	Comm Devel & Health Network (NI)
Alliance Party	Community Relations Council (CRC)
Association of NI Colleges	Culturlann McAdam O Fiaich
Baha'i Council for Northern Ireland	Democratic Unionist Party
Barnardos	Director Statutory Duty Team
British Deaf Association (NI)	Down's Syndrome Association
Carafriend	Comm on the Admin of Justice (CAJ)
Carers Northern Ireland	Employers' Forum on Disability
CEO, Disability Action	Equality Forum NI
Child Poverty Action Group (NI)	Falls Community Council
Children and Young People	Fermanagh Women's Network
Citizens Advice Bureau	FPA NI (formerly Family Planning Assoc)
Coalition on Sexual Orientation (CoSO)	Gay Lesbian Youth Northern Ireland
General Consumer Council	NI Council for Voluntary Action (NICVA)
Gingerbread Northern Ireland	Children's Law Centre
GMB	NI Human Rights Commission (NIHRC)
Help the Aged, Northern Ireland	NI Islamic Centre
Human Rights and Equality Unit	NI Unionist Party
Labour Party	NI Women's Coalition
Magherafelt Women's Group	NIAPA
MENCAP	NIPSA

Multi-Cultural Resource Centre	North West Community Network
Newry & Mourne Senior Citizens Consortium	North West Forum of People with Disabilities
Newry and Mourne Women	NI Women's European Platform (NIWEP)
NI Anti-Poverty Network	NSPCC
NI Comm, Irish Cong of TUs (NIC-ICTU)	NUS USI
NI Council for Ethnic Minorities (NICEM)	Omagh Women's Area Network
Parents & Professionals & Autism	The Roy Nat Inst for Deaf People (NI)
Pobal	The Ulster People College
Progressive Unionist Party	The Women's Centre
Rainbow Project	Traveller Movement Northern Ireland
Rural Community Network	UK Unionist Party
Rural Development Council	Ulster Farmers' Union
SDLP Policy Manager	Ulster Unionist Party
Sense NI	United Unionist Assembly Party
Sinn Fein	Waterways Ireland
Sperrin Lakeland Sen Citizen's Consortium	West Belfast Economic Forum
Statutory Duty & Human Rights Unit, OFMDFM	Women's Information Group
The Community Foundation for NI	Women's Res & Dev Agency (WRDA)
The Guide Dogs for the Blind Association	Women's Support Network
Youth Council for Northern Ireland	

