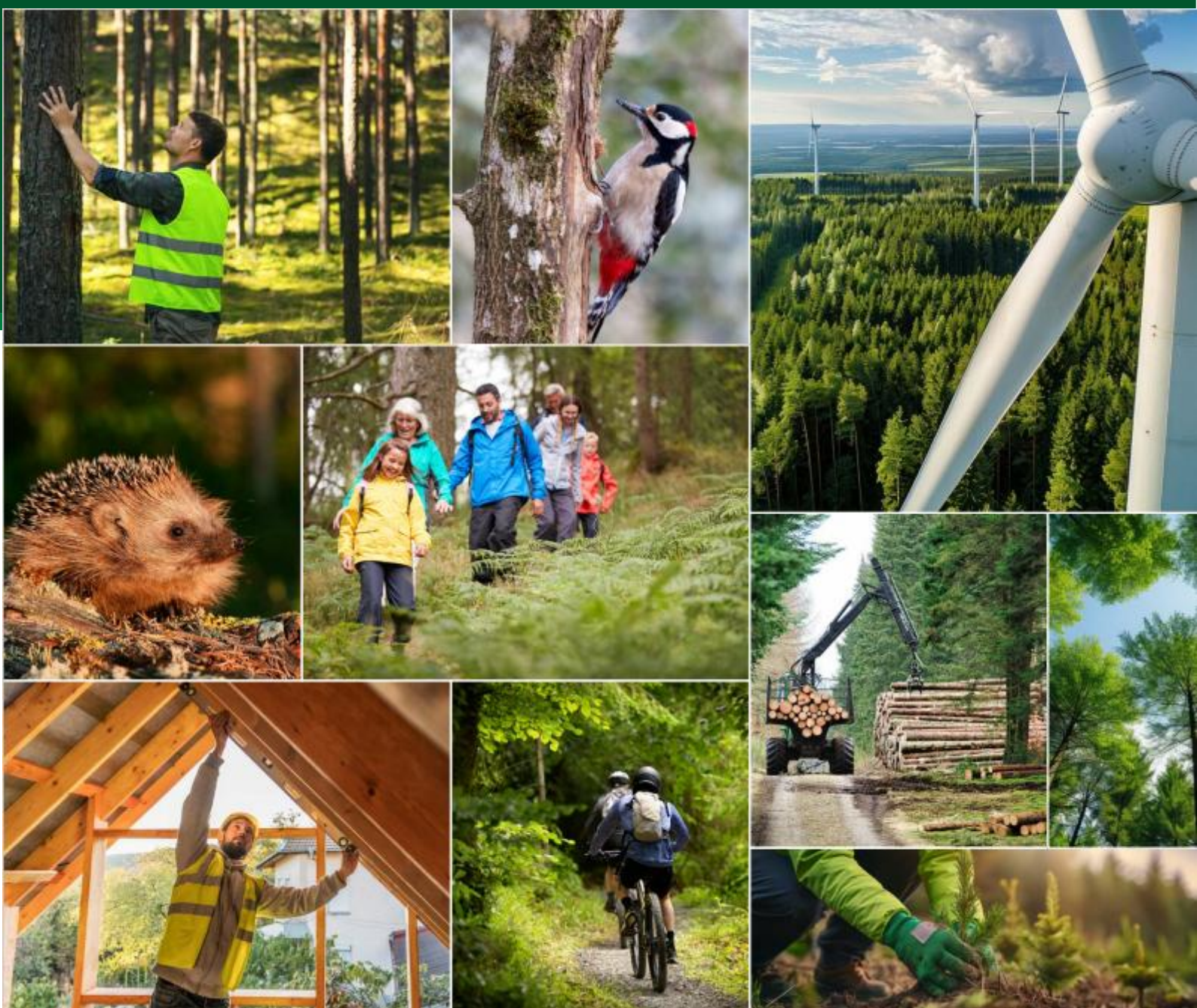


Land Use Strategic Implementation Plan 2026-2035

PUBLIC CONSULTATION RESPONSE REPORT



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Introduction

Coillte's Land Use Strategic Implementation Plan (LUSIP) translates the high-level ambitions and objectives outlined in Coillte's Forest Estate Strategic Land Use Plan (FESLUP) 2023-2050 into implementable and measurable actions over the period of 2026-2035. A copy of the LUSIP is available on the Coillte website at: [LUSIP](#)

The primary purpose of this LUSIP is to bridge the gap between strategy and implementation, making sure Coillte's long-term vision is realised based on a structured and collaborative approach that considers all land-based activities in the organisation.

The LUSIP was subject to Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA), and the draft plan and environmental documents were open for public CONSULTATION FOR a period of six weeks, in accordance with the requirements of the SEA legislation. During this time, the general public and the SEA Statutory Consultees were invited to make submissions and observations on the documents, for consideration by Coillte.

The purpose of this report is to summarise the submissions received during the consultation and to explain how those submissions relating specifically to the LUSIP were considered in the plan finalisation process. Responses relating to LUSIP's SEA Environmental Report (SEA ER) were prepared separately by Fehily Timoney, the appointed environmental consultant for the LUSIP, and are presented in the LUSIP SEA Statement. A copy of this Statement is available on the Coillte website at: [LUSIP_SEA_Statement.pdf](#)

Consultation Requirements

Article 6 of the SEA Directive, as transposed into European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations (S.I. No. 435 of 2004), as amended, sets out the statutory requirements for the public to be able to participate in the SEA process.

According to Article 13(1) and (2) of S.I. No. 435 of 2004, as amended:

13. (1) A competent authority shall

(a) send notice and a copy of the draft plan or programme, or modification to a plan or programme, and associated environmental report to the Public Bodies specified in article 9(5), as appropriate, and state that a written submission or observation with respect to the draft plan or programme, or modification to a plan or programme, and associated environmental report made to the competent authority within a specified period of not less than 4 weeks from the date of the notice will be taken into consideration before the finalisation of the plan or programme, or modification to a plan or programme, and

(b) publish notice, in accordance with sub-article (2), of the preparation of the draft plan or programme, or modification to a plan or programme, and associated environmental report in at least one newspaper with a sufficiently large circulation in the area covered by the plan or programme, or modification to a plan or programme.

(2) A notice under sub-article (1)(b) shall state that—

(a) a copy of the draft plan or programme, or modification to a plan or programme, and associated environmental report may be inspected at a stated place or places and at stated times during a stated period of not less than 4 weeks from the date of the notice (and the copy shall be kept available for inspection accordingly), and

(b) a written submission or observation with respect to the draft plan or programme, or modification to a plan or programme, and associated environmental report made to the competent authority within the period referred to in paragraph (a), or such period as may be specified in law in respect of the draft plan or programme, or modification to a plan or programme, will be taken into consideration before the finalisation of the plan or programme, or modification to a plan or programme.

In compliance with Article 13(1)(a), notice was sent to the following Statutory Consultees, inviting them to make a submission or observation on the draft LUSIP and environmental assessments documentation: the Environmental Protection Agency (EPA), Department of Housing, Local Government and Heritage, Department of Climate, Energy and the Environment (DCEE), Department of Agriculture, Food & the Marine (DAFM), and Department of Agriculture, Environment and Rural Affairs Northern Ireland (DAERA).

In compliance with Article 13(1)(b) and Article 13(2), notice of the publication of the draft plan and environmental documents were published on the Coillte website on 1st October 2025 and an advertisement notifying the public of the consultation period was published in the Irish Examiner on 3rd October 2025 – copies of both notifications are referenced in Figure 1.

A copy of the draft LUSIP, the SEA ER, NIR, and the SEA and AA Screening Determinations were on public display for a period of six weeks, from 1st October to 12th November 2025. The documents were made available on a designated page on the Coillte website see link: <https://www.coillte.ie/about-us/media/updates-2/>, along with information on how to make a submission or observation.

A printed copy of Coillte's draft LUSIP and associated environmental reports were also made available for the same period, at: Coillte Head Office, Dublin Road, Newtownmountkennedy, Co. Wicklow, A63 DN25.

Submissions received outside the consultation period were not considered as part of this consultation process in order to ensure fairness, transparency, and consistency for all participants.



Wed 1 Oct 2025

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Coillte Public Consultation on its Draft Land Use Strategic Implementation Plan

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Public Consultation

on its Draft Land Use Strategic Implementation Plan

Forests for wood

Forests for nature

Forests for climate

Forests for people

In 2022, Coillte launched its strategic vision for its future forest estate, aiming to deliver the multiple benefits of its forests for climate, nature, wood and people. Working towards realising this vision, in 2023 Coillte published the Forest Estate Land-Use Plan (FESLUP), which provides the framework to balance the delivery of the multiple benefits of our forests until 2050.

Coillte has now prepared a draft Land Use Strategic Implementation Plan (LUSIP), which translates the objectives outlined in the FESLUP into implementable and measurable actions over the period 2026-2035.

Coillte is now inviting submissions on its draft plan, including the relevant environmental assessment documentation which supports the plan.

A copy of the draft plan, Strategic Environmental Assessment Report, and Appropriate Assessment Screening and Natura Impact Statement Report may be viewed on Coillte's website at www.coillte.ie

A printed copy of the draft plan and associated environmental reports may also be viewed at Coillte Head Office, Dublin Road, Newtownmountkennedy, Co. Wicklow, A63 DN25 for 6 weeks from 1st October 2025.

Written submissions or observations with respect to the draft plan and associated environmental reports made during this consultation period, and received by Coillte, will be taken into consideration before the plan is finalised.

World News 7



European positions on Russia harden as drone incidents mount

By Stephen Lee
The European Union has hardened its position on Russia as drone attacks on civilian targets in Ukraine continue to mount. The EU has called for a ceasefire and for Russia to withdraw its forces from Ukraine.

Zelenskyy: Russian drones endanger safety

By Stephen Lee
Ukrainian President Volodymyr Zelenskyy has said that Russian drone attacks on civilian targets in Ukraine are endangering the safety of the population.



0 Korea agrees over adoption programme

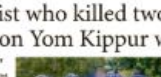
South Korea's Ministry of Health has agreed to a programme to adopt children from North Korea. The programme aims to help North Korean children who have been orphaned or abandoned.

Domestic escapes threat of Israeli

Domestic violence has increased in Israel as the threat of an Israeli attack on Gaza looms. The Israeli government has warned that it will launch a military operation in Gaza if Hamas does not withdraw its forces from the territory.

Terrorist who killed two in synagogue attack on Yom Kippur was British citizen

By Stephen Lee
A British citizen who was convicted of a terrorist attack on a synagogue in London during Yom Kippur has been sentenced to life in prison.



The man, who was born in the United Kingdom, was convicted of the murder of two people and the attempted murder of another. He was also convicted of possessing a firearm and of being a member of a terrorist organisation.

Perkins, Brown, and...

By Stephen Lee
The names Perkins, Brown, and... are mentioned in the article.

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Investigation of the...

By Stephen Lee
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Rohingya Muslims...

By Stephen Lee
Rohingya Muslims in Myanmar are facing persecution and violence.

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Public Consultation



Coillte is now inviting submissions on its draft plan, including the relevant environmental assessment documentation which supports the plan. A copy of the draft plan, Strategic Environmental Assessment Report, and Appropriate Assessment Screening and Natura Impact Statement Report may be viewed on Coillte's website at www.coillte.ie

A printed copy of the draft plan and associated environmental reports may also be viewed at Coillte Head Office, Dublin Road, Newtownmountkennedy, Co. Wicklow, A63 DN25 for 6 weeks from 1st October 2025.

Written submissions or observations with respect to the draft plan and associated environmental reports made during this consultation period, and received by Coillte, will be taken into consideration before the plan is finalised.

Submissions or observations can be made:

- by email to lusip_sea@coillte.ie
- in writing to: Coillte LUSIP SEA 2025, Coillte Head Office, Dublin Road, Newtownmountkennedy, Co. Wicklow, A63 DN25

Submissions or observations should include your name, address and where relevant the organisation or body represented. Please make your submission in one form only i.e., post, hand delivered or email.

The final date for receipt of submissions is 11th November 2025. Please note late submissions will not be considered.

For further information please visit www.coillte.ie

This consultation is being carried out in accordance with the requirements of S.I. No. 435 of 2004 (European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004, as amended by S.I. No. 200 of 2011 (European Communities (Environmental Assessment of Certain Plans and Programmes) (Amendment) Regulations 2011), a Strategic Environmental Assessment (SEA) is being carried out in respect of the draft LUSIP, and an SEA Environmental Report has been prepared. Further, in accordance with Article 6(3) and 6(4) of the Habitats Directive, an Appropriate Assessment is being carried out in respect of the draft LUSIP, and an 'Appropriate Assessment Screening & NIS Report' has been prepared.

Figure 1 Copy of the advertisement notices related to the LUSIP Public Consultation.

Consultation Requirements

A total of 16 submissions were received as part of the consultation – a summary of the submissions breakdown is outlined below.

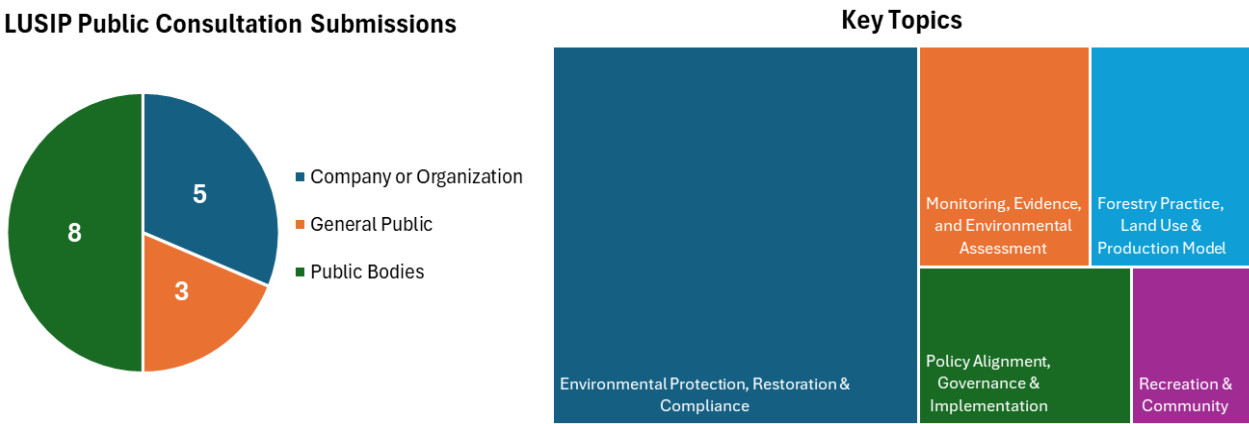


Figure 2 Submissions breakdown by consultee group and key topics.

Summary of Public Body Submissions

The submissions received from Public Bodies (including Statutory Consultees) provided a diverse range of feedback, focusing on environmental impacts, archaeological preservation, compliance with new forestry guidelines, and the need for comprehensive and transparent monitoring and communication strategies. Below is a summary of these submissions – see Appendix 1 for more details.

DEPARTMENT OF AGRICULTURE, ENVIRONMENT AND RURAL AFFAIRS

The Department of Agriculture, Environment and Rural Affairs (DAERA) submission focused on environmental protection and cross-border considerations. The Department acknowledged the scope of the LUSIP and the inclusion of environmental assessment processes and provided technical recommendations to strengthen the treatment of transboundary effects, air quality impacts and biodiversity protection.

DAERA requested clearer reference to recognised datasets, thresholds and monitoring approaches, as well as consistency in SEA terminology and reporting.

Overall, DAERA’s response was constructive and technical in nature, aiming to enhance environmental robustness and cross-jurisdictional coherence.

DEPARTMENT OF AGRICULTURE, FOOD AND THE MARINE

The Department of Agriculture, Food and the Marine (DAFM) provided a detailed technical submission on the Draft LUSIP. The Department broadly supported the direction of the Plan and welcomed Coillte's commitment to sustainable forest management, environmental protection, biodiversity enhancement and compliance with legislation.

However, DAFM requested clearer alignment with national forestry policy, legislation and the National Forest Strategy Implementation Plan. The submission sought greater clarity in several actions, timelines and assumptions, particularly in relation to timber production, peatland redesign, biodiversity delivery, and monitoring arrangements. DAFM also recommended strengthening environmental governance, Appropriate Assessment provisions, archaeological heritage protection, and the definition and use of monitoring indicators.

Overall, DAFM's position was supportive but advisory, seeking refinement and clarification to ensure full policy alignment, environmental compliance, and implementability of the plan.

DEPARTMENT OF THE ENVIRONMENT, CLIMATE AND COMMUNICATIONS

The Department of the Environment, Climate and Communications (DCEE) submission recognised the strategic importance of the LUSIP and welcomed Coillte's commitment to monitoring, learning, and climate-related land-use action. The Department highlighted the potential value of the information generated through implementation for national policy, research and understanding of carbon dynamics and habitat change.

DCEE requested clarification on how knowledge and findings arising from the Plan will be shared more widely.

Overall, DCEE expressed a supportive and strategic position, encouraging transparency and knowledge sharing.

ENVIRONMENTAL PROTECTION AGENCY

The Environmental Protection Agency (EPA) provided a comprehensive environmental review of the Draft LUSIP and associated SEA documentation. The Agency acknowledged the scale and importance of the Plan and its potential to deliver environmental benefits.

The EPA requested clearer monitoring arrangements, including SEA monitoring, indicators, data sources and remedial responses. It also sought stronger alignment with national environmental and climate policy, clearer treatment of water protection and catchment-scale benefits, consideration of climate risk and nature-based solutions, and refinement of SEA objectives, mapping and environmental assessment detail.

Overall, the EPA's position was supportive but analytical, aiming to strengthen environmental governance, monitoring clarity, and evidence-based implementation.

GEOLOGICAL SURVEY IRELAND

The Geological Survey Ireland (GSI) submission acknowledged the relevance of geological, soil and peatland considerations to land-use planning. The organisation recommended stronger integration of geoscience data, recognition of geoheritage and geoparks, and use of national datasets to inform restoration and environmental decision-making.

Overall, GSI's response was supportive and technical, seeking improved evidence integration rather than changes in direction.

HISTORIC ENVIRONMENT DIVISION

The Historic Environment Division (HED) submission focused on the protection of archaeological heritage. The Division acknowledged the inclusion of heritage considerations within the environmental governance framework but advised that stronger and more explicit commitments were required.

HED requested the systematic application of Archaeological Impact Assessment where relevant, clearer mitigation approaches prioritising avoidance, and explicit reference to relevant legislation, policy frameworks and international conventions. Additional engagement with heritage authorities and World Heritage processes was also requested.

Overall, HED's position was supportive subject to strengthened heritage safeguards and clearer statutory referencing.

NATIONAL PARKS AND WILDLIFE SERVICE

The National Parks and Wildlife Service (NPWS) provided a focused submission on biodiversity protection, conservation governance, and alignment with national nature policy. The Service acknowledged the environmental ambition of the LUSIP and Coillte's commitment to biodiversity enhancement, habitat restoration and sustainable land management.

NPWS requested clearer commitments in several areas, including the sharing of biodiversity data with national bodies such as the National Biodiversity Data Centre and NPWS, and stronger collaboration in the development and implementation of the national Deer Management Strategy. Clarifications to terminology and governance references were also recommended.

Overall, NPWS' position was supportive but advisory, seeking strengthened biodiversity coordination, clearer data sharing, and alignment with national conservation frameworks to ensure effective delivery of nature outcomes.

UISCE ÉIREANN

Uisce Éireann (UE) welcomed the environmental ambition of the LUSIP, particularly peatland restoration, rewetting and nature-based approaches that may benefit water quality and

downstream drinking water sources. The organisation highlighted the presence of drinking water abstractions within Coillte lands and expressed interest in engagement and collaboration on catchment protection and restoration initiatives.

UÉ also suggested that protection of drinking water sources be reflected within the governance framework.

Overall, UÉ's submission was supportive and collaborative in tone, focused on partnership and water quality outcomes.

Summary of Non-Statutory Submissions

This section summarises submissions received from members of the public and private organisations, highlighting their interests in the implementation of the LUSIP. Their insights have been considered in the plan finalization process. In line with the General Data Protection Regulation (GDPR), the full submissions are not provided.

COMPANIES/ORGANISATIONS

A number of submissions were received from community groups and organisations. Overall, they acknowledged the ambition of the LUSIP and supported its focus on climate, nature, wood and people.

Many submissions focused on the need for stronger environmental protection and restoration, including increased use of native woodland, peatland restoration, and a move away from monoculture forestry. Concerns were raised about the impacts of past forestry practices on biodiversity, water and landscapes, and there were calls for these to be addressed in future management.

There was also a strong emphasis on local context, with requests that land-use decisions take account of sensitive landscapes, water catchments and high nature value areas. Some submissions suggested reviewing existing forest types in these areas and considering more nature-focused alternatives.

Stakeholders highlighted the importance of clear targets, monitoring and transparency, as well as ongoing engagement with local communities. There were calls for improved communication and collaboration throughout the implementation of the Plan.

Recreation and access were also raised, including requests for expanded and better-managed access for activities such as horse riding.

Overall, these submissions were supportive and sought greater engagement.

GENERAL PUBLIC

A number of submissions were received from members of the public raising concerns about forestry practices and land use at a local level.

Overall, these submissions recognised the opportunity for the LUSIP to take a more balanced approach to forestry, with greater focus on nature, biodiversity and community impacts.

Key concerns included the effects of past forestry practices, particularly monoculture planting and impacts on peatlands, landscapes and biodiversity. There were calls for more native woodland planting and more environmentally focused management in the future.

Some submissions also highlighted concerns about the impact of forestry on rural communities, including land use and local services, and suggested that future management should better support local needs.

Environmental issues such as biodiversity protection and deer management were also raised, with suggestions to strengthen how these are addressed.

Overall, these submissions were constructive, seeking stronger environmental and community outcomes.

Appendix I

ID	Consultee	Key Topics	Request	Response/Amendment
1	DAFM	Policy Alignment, Governance & Implementation	Section 4, Plan Delivery Coillte is recommended to elaborate the alignment of the LUSIP with the National Forest Strategy Implementation Plan (NFSIP). Reference in the LUSIP is required to all NFSIP actions that Coillte are leading or are involved in.	We have reviewed the National Forest Strategy Implementation Plan (NFSIP) in detail, and we can confirm that the LUSIP is fully aligned with the direction and actions set out in the NFSIP. The LUSIP reflects Coillte's role in supporting and delivering the relevant NFSIP actions, particularly those related to land-use planning, biodiversity enhancement, climate mitigation, and sustainable forest management.
2	DAFM	Policy Alignment, Governance & Implementation	CO2 – <i>“Engage with government and other key regulatory bodies to ensure that the policy and regulatory framework supports Coillte’s Climate ambitions”</i> . DAFM would consider it more appropriate to state: “Engage with government and other key regulatory bodies to ensure that Coillte’s Climate ambitions align and support the policy and regulatory framework”. It is not for government policy to support Coillte, instead Coillte must support government policy.	The LUSIP operates within a tiered planning framework, where the strategic objectives and overall direction were established through the FESLUP, following full SEA, AA and public consultation. As an implementation-level plan, the LUSIP must remain aligned with and bounded by those higher-order plans and therefore cannot amend the objectives themselves.
3	DAFM	Policy Alignment, Governance & Implementation	CO3 – Reference has been made by Coillte to local and national government. DAFM is recommending to widen the description and include all public sector bodies that own land in this action.	Please refer to response in ID2.
4	DAFM	Environmental Protection, Restoration & Compliance	CO6.A1 – DAFM request that the redesign of peatlands and unproductive forests must align with national objectives and plans. It is not sufficient to engage, where appropriate, with external stakeholders. In order to meet obligations (e.g. under Habitats Directive and under Nature Restoration Regulations), NPWS and the work they	We note our MoU with NPWS and acknowledge the need to continue to engage and partner on projects relating to the redesign of peatlands and unproductive forests. Coillte will ensure that these plans align with national objectives.

			are currently undertaking in relation to identification of areas for peatland restoration must be actively involved in this process. The MoU signed by Coillte and NPWS was designed to ensure greater collaboration and should be referenced.	
5	DAFM	Environmental Protection, Restoration & Compliance	CO10 – DAFM request that this action must take consideration of other obligations under the Habitat’s Directive, Birds Directive, and the Water Framework Directive.	Please refer to response in ID2.
6	DAFM	Policy Alignment, Governance & Implementation	CO16 – The wording of this action is not clear. Suggested wording is: “Appropriate Assessment where necessary”	Please refer to response in ID2.
7	DAFM	Policy Alignment, Governance & Implementation	Ambition 5 - Sub bullet points are referencing actions by 2029, while the target is planned to be achieved by end 2025.	Please refer to response in ID2.
8	DAFM	Policy Alignment, Governance & Implementation	NO2 – see comments for CO16	Please refer to response in ID2.
9	DAFM	Policy Alignment, Governance & Implementation	NO4 – see comments for CO16	Please refer to response in ID2.

10	DAFM	Environmental Protection, Restoration & Compliance	NO13.A1 – DAFM requests that the focus should not only be confined to statutory designated sites. From the text it is not clear if Coillte are referencing European sites only or whether national sites e.g. NHAs and pNHAs are considered and included, too. This will need to be further clarified.	Action N13.A1 reflects Coillte's commitment to collaborate with relevant agencies/experts to develop action plans for protected species and habitats. The action applies to both European and national sites, including NHAs and pNHAs. In response to your comments, the action has been updated to read: "Maintain and update the existing protocols for protected species and habitats and develop action plans for key species on the estate (e.g. lesser horseshoe bat, freshwater pearl mussel etc.) having due regard to existing and emerging best practice and relevant NPWS species plans, such as: • Hen Harrier Threat Response Plan • Lesser Horseshoe Bat Species Action Plan"
11	DAFM	Environmental Protection, Restoration & Compliance	NO17 – The draft makes reference to collaboration to develop best practice, but does not include commitment to carry out the work. This should be amended.	Please refer to response in ID2.
12	DAFM	Policy Alignment, Governance & Implementation	PO1 - see comments for CO16	Please refer to response in ID2.
13	DAFM	Policy Alignment, Governance & Implementation	PO2. A1 – It is not clear why the agreement is planned from 2030 to 2035, whereas the title of Ambition 9 references 2030?	Coillte currently have a strategic partnership agreement with Failte Ireland in place up to 2029. During 2029, we will continue to discuss a potential new agreement for the next 5-year period 2030-2035. As this action will be undertaken in 2029, it is included and within the timeframe of Ambition 9.

14	DAFM	Environmental Protection, Restoration & Compliance	DAFM encourages Coillte to consider amending or including a supplemental Action under C011.A1 or an environmental mitigation measure in Appendix 6 that explicitly recognises that a practical forest management practice that can be undertaken to de-risk or mitigate potential impacts from extreme weather events related to climate change is to assess archaeological sites and monuments that have trees growing on them or within their immediate environs and to identify for careful proactive pollarding / early removal those trees at greatest risk of windthrow and to prevent, through proactive but sympathetic vegetation management, the natural regeneration of other trees in such cleared areas subsequently.	Coillte endeavours to establish buffer zones around existing monuments as early as possible through adherence to existing Archaeology guidelines.
15	DAFM	Environmental Protection, Restoration & Compliance	DAFM encourages Coillte to consider making a supplemental commitment thereunder to also engage with the National Monument Service, as the lead agency for the implementation of the World Heritage Convention in Ireland, as well as other agencies involved in the management and conservation of state-owned World Heritage properties (such as the OPW) and/or with progressing at local level the nomination process for the Tentative List Sites (in particular the Local Authority leading a TLS nomination, whether solely or on behalf of other Local Authorities). In this latter respect, Coillte's attention is drawn to the Pilot World Heritage Strategic Investment Fund 2025. Pilot World Heritage Strategic Investment Fund - 2025 Call for Projects	Thank you for your submission. Coillte acknowledges the role of the National Monuments Service, the OPW, and relevant Local Authorities in the management and conservation of World Heritage properties. Where appropriate and relevant to specific projects, Coillte will engage with these agencies to support conservation objectives and any related nomination processes, in line with its statutory obligations and governance frameworks.
16	DAFM	Monitoring, Evidence &	It is important to be cognisant throughout the LUSIP of the contribution the climate objectives can make to both climate mitigation and adaptation. The document	This is noted and we acknowledge the need to further acknowledge the contribution of climate objectives to climate mitigation and adaptation

		Environmental Assessment	currently requires a greater acknowledgement of adaptation throughout the climate related sections.	
17	DAFM	Forestry Practice, Land Use & Production Model	Page 2 In terms of Forests for Wood, 20% as the baseline is lower than the current level of timber frame construction. The Irish Timber Frame Manufacturers Association representative noted at the last Timber in Construction meeting that timber frame houses in schemes is now at approx. 72%	Noted. There are a few methods of calculating % of timber frame homes. Irish Timber Frame manufacturers association currently estimate the timber frame market share of new scheme homes to be 50%. Scheme homes however are a subset of total units constructed on the Island.
18	DAFM	Policy Alignment, Governance & Implementation	Page 4 This section states that “The LUSIP is being developed through a phased approach. The initial stage focuses on creating an outline plan that details the high-level actions for each FESLUP objective, while the second stage refines these actions through extensive consultation and environmental assessments.” Is this document the initial stage or is there a second stage to come following the completion of this consultative process?	Thank you for the observation. The Draft LUSIP represents the initial outline stage. It will be updated following completion of the SEA consultation and will incorporate refinements informed by stakeholder feedback, environmental assessment, and further internal analysis.
19	DAFM	Policy Alignment, Governance & Implementation	CO1 The Government is currently undertaking a Land Use review. It is not clear if this CO1 action will be part of this ongoing Land Use review or if Coillte are planning something different. Suggestion to include a new sub task which references the Land Use Review and include a partnership icon if Coillte are involved in this process.	Objective CO1 was developed under the FESLUP which in itself has been subject to SEA and AA. As noted in Objective CO2*, Coillte will continue to engage with government and other key regulatory bodies, including the Land Use Review as appropriate, to ensure that the policy and regulatory framework supports Coillte's Climate ambitions. Coillte were part of the Technical Working Group (TWG) of the of the governmental Land Use Review Phase 2 (LUR-2) and engaged on the FESLUP with members of the TWG. Coillte's ambition in this area will consult with LUR process.

20	DAFM	Environmental Protection, Restoration & Compliance	Ambition 5 Should the overall ambition be referencing 2030 and not 2025?	Ambition 5 reflects Coillte's commitment to increase the area of our estate managed primarily for nature to 30% by 2025. This requires us to identify, assess and map 44,000ha of new biodiversity areas on the estate by the end of 2025. The management of Coillte's biodiversity areas will of course extend well into the future, beyond the timespan of the LUSIP.
21	DAFM	Environmental Protection, Restoration & Compliance	NO2.A1 It is not clear if the 2,000ha relates to an annual operational programme or a total area for biodiversity interventions for the full period 2026-2030. Looking at the volumes from CCF in WO1.A1, it would appear to be an annual target.	This target for this action is to scale up the management of biodiversity areas so that, by 2029, an annual operational programme of 2,000ha per year is achieved.
22	DAFM	Environmental Protection, Restoration & Compliance	NO2.A1, NO4 It appears that Continuous Cover Forestry (CCF) is only mentioned in the context of restoring biodiversity and in forests of high ecological value. Consideration should be given to the important role that CCF can play as an alternative to clearfelling, which has the potential to enhance carbon stocks in Coillte's Forest estate, as outlined in the Teagasc MACC.	Thank you for your submission. Coillte is committed to expanding the area of its estate managed under Continuous Cover Forestry (CCF). Implementation will prioritise sites where managing for nature or for people is a priority, including native, mixed, and productive conifer forests. While the primary focus is biodiversity and social objectives, CCF also provides climate and carbon benefits across the estate, supporting the enhancement of carbon stocks where appropriate.
23	DAFM	Environmental Protection, Restoration & Compliance	Ambition 6 The tile of this ambition states "Transform areas of our forests so that 50% of our estate is managed primarily for nature in the long-term." Does long term refer to 2050? This currently lacks clarity.	Certainly the 50% that will be managed for nature will be identified before 2050, but it is likely that management of these sites for nature will extend well beyond 2050 and will be an ongoing activity into the future.
24	DAFM	Forestry Practice, Land Use &	WO1.A1 The action will produce 3 to 3.3 M m3 annually. Over the last 5 years, the CSO wood removal survey reports that Coillte have produce ca. 2.4 M m3. Is an increase in	The volumes stated include Coillte and financial partners on Coillte land or land managed by Coillte. Reason for inclusion is to include the maximum activity levels in environmental assessments.

		Production Model	production of roundwood to this extent planned under the LUSIP and if so, what makes this increase possible? The level of thinning planned over the 10-year period is 3 to 4 M m³. Assuming that a thinning operation removes 85 m³, this means that 35,000 to 47,000 ha will be thinned over the 10-year period or 3,500 to 4,000 ha per annum. Over the last 5 years Coillte have thinned ca. 11,000ha per year. A reduction in the level of thinning by two-thirds is a significant shift in policy and in the interest of transparency needs to be spelled out in the Strategic Vision. Thinning has always been recognised as good forest management, which has benefits for climate, nature, wood and people. A reduction in the level of thinning and an increase in the level of clearfelling is an intensification in the type of forest management. 55-60 thousand hectares of restock is planned, which seems low given the level of felling envisaged.	The thinning area is reducing compared to historic levels, in the LUSIP we estimate thinning area to be 7,600ha to 8,400 ha. Which is approximately a 30% reduction compared to near term historical thinning area
25	DAFM	Forestry Practice, Land Use & Production Model	WO1.AX WO1 would benefit from an additional action regarding sustained yield. Something along the lines of: Continually review and analyse forest management practices to ensure that our rate of harvesting does not exceed the forests growth rate thereby securing a continuous supply of timber in the long-term.	The following action has been added. WO1.A2 "Coillte will continually review and analyse forest management practices and growing stock to ensure that our rate of harvesting does not exceed the forests growth rate thereby securing a continuous supply of timber in the long-term" in light of your comments.
26	DAFM	Monitoring, Evidence & Environmental Assessment	CO11.A1 Current formulation of this objective is difficult to understand. Consider rewording this objective to "Develop a forest resilience strategy that considers the impacts of climate change and identify mitigating measures to help our forests adapt to these climate risks. Evaluate how these findings can be incorporated into our planning models."	The following action has been added. CO11.A1 to "Develop a forest resilience strategy that considers the impacts of climate change and identify mitigating measures to help our forests adapt to these climate risks. Evaluate ow these findings can be incorporated into our planning models" in light of your comments.

27	DAFM	Forestry Practice, Land Use & Production Model	Mission 7 – page 17 There is an opportunity to engage/collaborate with the recently announced KDI facility for timber.	Noted. Engagement with the KDI will be important and Coillte will engage appropriately
28	DAFM	Forestry Practice, Land Use & Production Model	Various thematic groups have worked over the past two years to carry out this work under the Interdepartmental and Industry steering group on Timber in Construction, of which Coillte has contributed. As the barriers/opportunities have been identified, this action may be better adjusted to support NSAI in the development of a National Technical specification for Mass Engineered Timber.	Noted. Coillte will continue to support the implementation of Timber In Construction Steering Group's (TICSG) recommendations, ensuring effective governance, oversight, and sector alignment are maintained. This will include engaging with NSAI and other relevant stakeholders.
29	DAFM	Recreation & Community	PO4.A1 It is not clear whether the monitoring of visitor number relates to key destination sites or the overall forest visits. It would be beneficial for overall visits to be reported.	Coillte monitors visitor numbers through counter units installed at it's high-use recreation sites. It is not feasible to expand this to cover all forests.
30	DAFM	Monitoring, Evidence & Environmental Assessment	Section 5 – Monitoring The list of indicators that will facilitate monitoring is a key component to assess the progress on the delivery of the LUSIP. The current list of indicators is insufficient to allow tracking of progress on implementation. Each action needs to have an indicator specified, which will ultimately give stakeholders a clear indication of how the plan is being implemented. It is required that each indicator is defined with a description, a measurement unit, a target, and a baseline.	We acknowledge the value of detailed indicators. However, the LUSIP is a strategic-level plan, and not all actions are suited to quantitative targets. The current indicators are designed to track progress across multiple actions without requiring operational-level detail. Some actions - such as engagement and partnership measures - are not suitable for measurable targets. Coillte will report progress at the 5-year review point.
31	DAFM	Monitoring, Evidence &	The sub heading in this section is titled “Environmental Mitigation”. This section should be expanded to include “and Adaptation” in the title or create a new subheading	Noted. In the context of the SEA, environmental “mitigation” already covers both mitigation and adaptation

		Environmental Assessment	called “Environmental Adaptation” and separate out the appropriate measures.	measures. To avoid confusion in terminology, we will remove the heading in the final version of the plan.
32	DAFM	Environmental Protection, Restoration & Compliance	Page 6 and Action NO18.A1 DAFM welcomes the reference to deer management in the draft LUSIP and related Action NO18.AI. DAFM requests that Coillte should review this action in light of the organisation’s involvement in the Irish Deer Management Forum. Coillte’s strategy in relation to Deer should generally take account of the organisation’s role as a partner of the Irish Deer Management Forum. Coillte have given a commitment to work in collaboration with stakeholders in dealing with high deer densities as part of this work. Coillte’s attention is drawn to the report that was agreed by the Forum and includes and agreed approach for managing wild deer. NO18.A1 should therefore be expanded to include the agreed approach set out in the report and clarifying that Coillte is taking a pro-active role in reducing deer numbers in the Coillte estate and that it will not be a pre-requisite for the organisation taking action for a Deer Management Strategy to be put in place. However, it is agreed that following introduction of a strategy, Coillte’s approach may need to be adapted.	Noted. Deer management is a national issue involving multiple stakeholders that is being addressed through the establishment and management of Deer Management Units (DMU) by FRS on behalf of the Irish Deer Management Strategy Group, of which Coillte is a member. Coillte is committed to working in collaboration with the IDMSG in achieving it’s objectives. Coillte’s foresters will work with Deer Management Unit Coordinators where Coillte’s lands are within or adjoin DMUs as a landowner member of the DMU.
33	DAFM	Monitoring, Evidence & Environmental Assessment	Section 5, Monitoring DAFM welcomes the introduction of a list of high-level indicators in this plan and highlights the requirement for a more detailed definition of each indicator as explained above. In addition, it is not clear if there are any further mechanisms for monitoring of the plan foreseen by Coillte, such as the introduction of a Monitoring Committee. Coillte is recommended to expand on this	We appreciate this suggestion, however, the LUSIP is intended to remain a strategic-level plan. Coillte will provide a formal progress report at the 5-year LUSIP review, rather than establishing a separate monitoring committee. This ensures consistency with the Plan’s governance framework.

			section by providing further detail on the monitoring process and to introduce a Monitoring Committee which includes all relevant stakeholders, including DAFM.	
34	DAFM	Monitoring, Evidence & Environmental Assessment	As regards some specific indicators, DAFM considers that further clarification and amendment is required: ‘ <i>Area of biodiversity interventions implemented per year (ha)</i> ’ is very generic and will not necessarily provide an insight into how the plan is being implemented or what areas need adjustment /additional support. It is therefore required that data be provided per action in order for it to be useful.	Noted. However, given the national scale of the LUSIP, indicators must remain strategic rather than operational. More detailed planning occurs on the following tiers of our planning framework. Please refer to Figure 5 of the LUSIP for further details. The LUSIP indicators are intended to track progress on the overall ambitions rather than prescribe operational detail.
35	DAFM	Monitoring, Evidence & Environmental Assessment	‘ <i>Area identified as appropriate for forested peatland redesign (ha)</i> ’ – this is the first step, but once identified, implementation of the areas identified will need to be monitored as well.	This is noted and agreed.
36	DAFM	Monitoring, Evidence & Environmental Assessment	It is not clear what the “Number of staff and contractors employed by Coillte” is indicative of & will be required to have the monitoring indicators linked to the actions under the Ambitions.	Coillte retains operational staffing levels and its contractor base at optimum levels to deliver its objectives.
37	DCEE	Environmental Protection, Restoration & Compliance	1. Does Coillte have a figure for unplanted peatlands under its ownership / stewardship? 2. If so, has Coillte considered plans for its unplanted peatlands in relation to its objectives? 3. The rehabilitation or rewetting of unplanted peatlands could assist with the State’s Climate Action Plan (CAP) targets and peatland related targets across numerous policy areas. Assuming there are unplanted peatlands which could be rewetted, it would be worthwhile if this	The Coillte estate includes extensive unplanted peatlands. We are conscious of the importance of the unplanted peatlands for both nature and climate. Coillte's carbon modelling work has focussed on forested peatlands. However, large areas of unplanted peatlands have been assessed and mapped as biodiversity areas (see Action N01.A1) because they are ecologically valuable habitats. Please note that unplanted peatlands are referenced in the Nature pillar: Action N02.A1 states that management actions will be scaled up, including "re-wetting or

			could be added as a progress indicated in section 5 monitoring.	maintaining ecologically important bog habitat". Our approach to managing the unplanted peatlands will aim to benefit both climate and nature. With respect to Monitoring (Section 5), we have listed: Area of biodiversity interventions implemented per year (ha). Biodiversity interventions will include rewetting peatland habitats, both unplanted and restored.
38	DCEE	Environmental Protection, Restoration & Compliance	3. Is the 30,000 ha limited to Coillte lands, or does Coillte also see itself as potentially acting as a delivery partner on non-Coillte lands?	The 30,000 ha is limited to Coillte owned land only and is not extended to non-Coillte lands
39	DCEE	Forestry Practice, Land Use & Production Model	1. It is not fully clear whether this is limited to Coillte lands only, or if Coillte see themselves as playing a role in developing renewables on third party lands. 2. If on Coillte lands, it would be useful to know how Coillte plan to balance the needs for multifunctional land use with potentially competing land use objectives and goals.	Regarding Point 1 - Coillte in its own right does not develop renewable energy projects, we support and enable projects through land agreements. FEI, a joint venture between Coillte and ESB will be developing projects on Coillte property and other third party lands. Regarding Point 2 - it is important to consider that whilst there may be one primary objective, it does not preclude the forest or lands delivering on other additional objectives. The Coillte estate is multi-purpose and any proposed renewable energy project is considered through the lens of wood, climate, people and nature. Our approach has sought to balance forest objectives at the overall estate level.
40	DCEE	Monitoring, Evidence & Environmental Assessment	3. The work over the coming years, and the clear commitment to monitoring and analysis of best practice across numerous activities will likely provide very valuable information to the 'state of play' for the understanding of carbon dynamics, habitat mapping and other aspects of land use. Further information on how Coillte plans to make such learnings and information	Coillte agrees that sharing learning is important. A mid-term implementation report will summarise findings, progress, and insights from key actions, including carbon, habitat and land-use interactions. These findings will be communicated through appropriate channels and made accessible to statutory and non-statutory stakeholders.

			available to the wider ecosystem of policy makers, academics and other relevant bodies would be useful.	
41	DCEE	Recreation & Community	P016: • While specifically mentioned in relation p014, there may be scope to support the provision of education and training in relation to skills for forest to bog redesign and peatland rewetting more broadly.	This is noted and agreed. There may be an opportunity as stated.
42	DCEE	Monitoring, Evidence & Environmental Assessment	In relation to the “GHG profile of the Coillte estate” listed as an indicator in section 5, monitoring: 1. It would be useful to see further detail in relation to this. How will this be broken down and will this be aligned with National Inventory Reporting categories and classifications?	Coillte's GHG profile is developed using CBM-CFS3, which is consistent with the National Forest Inventory's GHG modelling approach. However, it is underpinned by Coillte's stand-level data and Strategic forecast. The GHG profile can be broken down by the specific components: forest, HWP and soils. 1:1 alignment with the NIR is not directly possible due to differences in system boundary, data resolution and stratification.
43	EPA	Environmental Protection, Restoration & Compliance	With regards to Coillte’s 100,000 ha target, the concept of ‘the right trees in the right place for the right reasons with the right management’ as set out in the Forest Strategy should be reflected in the planning and implementation of any new forestry.	The management of all sites across the company is guided by the principle of “the right tree, in the right place, for the right objective.” This approach ensures that decisions on reforestation, redesign, restoration or alternative land uses follow the suitability of each site and support improved outcomes for water, biodiversity and long-term resilience.
44	EPA	Monitoring, Evidence & Environmental Assessment	Where monitoring identifies adverse impacts during the implementation of the LUSIP, Coillte should ensure that suitable and effective remedial action is taken at the appropriate level.	Potential impacts arising from all operations are addressed and managed through Coillte's existing operational, environmental and risk management processes, including the Environmental Risk Assessment (ERA) process, as appropriate. Delivery of LUSIP actions will be monitored through Coillte’s governance and environmental management processes, to ensure that any potential adverse impacts identified are promptly

				assessed and addressed through appropriate remedial action if necessary.
45	EPA	Forestry Practice, Land Use & Production Model	The EPA suggests that Coillte should provide details in the LUSIP on how you intend to achieve the 100,000 ha target by 2050, given its critical importance in the delivery of the national forest strategy target.	A specific action (CO1.A1) has been included in the LUSIP which addresses outlining the potential pathways to support the sustainable delivery of 100,000 ha by 2050.
46	EPA	Monitoring, Evidence & Environmental Assessment	In the development of Coillte's Forest Resilience Strategy, the EPA recommends alignment to the National Climate Change Risk Assessment, particularly in the selection of reference scenarios RCP4.5 (moderate emissions) and RCP8.5 (high emissions) for the quantification of the impacts of climate change, resilience planning, and in the formulation of future plans and guidance.	This is a relevant comment and we confirm that we have already been using the reference scenarios RCP4.5/8.5 (SSPs) and have been processing the raw data from EPA/ICHEC for the purposes of incorporating into our forest resilience and adaptation modelling frameworks.
47	EPA	Monitoring, Evidence & Environmental Assessment	The EPA suggests Coillte consider the role of Nbs and assess the potential for cascading risks when developing its Forest Resilience Strategy.	The role of Nature Based Solutions will be considered in the context of the Strategy.
48	EPA	Environmental Protection, Restoration & Compliance	The EPA recommends that the LUSIP should commit to addressing past forestry practices that negatively impacted on water quality and habitats. Examples of key measures to address these historic practices include the installation of enhanced riparian buffers zones, conversion to continuous cover forestry and land use change to other habitats where lands are no longer considered suitable for reforestation.	Noted. The need to address legacy forestry practices is already embedded in the FESLUP. Because the LUSIP cascades directly from the FESLUP, these concepts are already reflected in the actions of the plan at the appropriate strategic level.
49	EPA	Monitoring, Evidence &	With regards monitoring considerations, while the LUSIP describes the LUSIP specific monitoring elements, it	To keep the LUSIP clear and accessible as an implementation-level plan, we do not intend to

		Environmental Assessment	should also include information on the SEA Monitoring programme.	incorporate the full SEA monitoring detail into the body of the Plan, as this would add unnecessary complexity. However, both LUSIP and SEA indicators will be monitored in parallel and complement each other, ensuring that environmental commitments are tracked appropriately.
50	EPA	Policy Alignment, Governance & Implementation	Ambition 1, C01, it will be important to refer to existing cataloguing work on land policy that was completed for Phase 1 of the Land Use Review. In C01.A1, it is not clear whether potential pathways will reference specific locations or be generalised to a national level.	The specific pathways referenced in C01.A1 will be generalised at national level.
51	EPA	Environmental Protection, Restoration & Compliance	In C06.A1, the intended meaning of “redesign of peatlands” should be clarified and whether it means restoration, rehabilitation and/or rewetting. Coillte may wish to consider this in the context of the Nature Restoration Regulation (Article 11).	In the context of the LUSIP, the term "redesign of peatlands" refers to both rewetting and conversion to semi-natural woodlands. The prescriptions will be assigned at site level based on the local conditions.
52	EPA	Environmental Protection, Restoration & Compliance	For N05, this should commit to align with methodologies used by the Central Statistics Office (CSO) for Ecosystem Accounts. It should also consider the indicators in the proposed EU Soil Monitoring Law.	Noted. We will follow up on your suggestion to align with/consider CSO Ecosystem Accounts and proposed EU Soil Monitoring Law.
53	EPA	Forestry Practice, Land Use & Production Model	In CO5.A1 consider amending the wording as follows “...deliver new afforestation at suitable locations...”	Noted. As CO05.A1 refers to the funding models, we believe no amendment is required. However, it is envisaged that any new afforestation project will be delivered in suitable locations.
54	EPA	Monitoring, Evidence &	For CO11.A1, regarding the intention to prepare a forest resilience strategy. This should consider both SEA and AA requirements screening.	The Forest Resilience Strategy is still under development, but it is noted that once complete an SEA and AA will be considered as part of it.

		Environmental Assessment		
55	EPA	Environmental Protection, Restoration & Compliance	In NO17.A1, consider clarifying whether the ‘best practice for controlling invasive species’ will be prepared within the lifetime of the LUSIP.	The wording of the LUSIP reflects Coillte's intention to develop best practice for the control of invasive species during 2026-2030. In reality, this process will extend indefinitely as new techniques and approaches are developed, either by Coillte or by other agencies involved in this activity.
56	EPA	Forestry Practice, Land Use & Production Model	CO3.A1 “Support and facilitate those public bodies who are committed to pursuing opportunities for afforestation on publicly owned land by supplying key afforestation management and planning services, at where appropriate locations.”	Noted. We amended CO3.A1 to "Support and facilitate those public bodies who are committed to pursuing opportunities for afforestation on publicly owned land by supplying key afforestation management and planning services, at where appropriate locations." in response to your submission.
57	EPA	Forestry Practice, Land Use & Production Model	C04.A1 “Consider proposals to help promote sustainable farmer-led afforestation at suitable locations and collaborate with key stakeholders.”	Noted. We amended CO4.A1 to "Consider proposals to help promote sustainable farmer-led afforestation at suitable locations and collaborate with key stakeholders." in response to your submission.
58	EPA	Environmental Protection, Restoration & Compliance	C06.A1 “Review existing in-house information to identify suitable potential locations for the redesign of ca. 15,000 ha of peatlands and engage with key external stakeholders as appropriate, ensuring environmental considerations and constraints inform this process where possible....”	Noted. We amended CO6.A1 to "Review existing in-house information to identify suitable potential locations for the redesign of ca. 15,000 ha of peatlands and engage with key external stakeholders as appropriate, ensuring environmental considerations and constraints inform this process where possible. Redesign of unproductive peatland forests will ultimately be delivered over the longer term and subject to carbon funding initiatives." in response to your submission.

59	EPA	Recreation & Community	<i>P05.A1 “Expand the Woodlands for Health programme at suitable locations, while promoting sustainable and environmentally responsible interaction with woodland areas.”</i>	Coillte remains engaged with the Woodlands for Health programme.
60	EPA	Monitoring, Evidence & Environmental Assessment	In Table 8-4 <i>Environmental Governance Framework</i> , with regards the commitment to prepare ‘Biodiversity Area Management Plans’ (page 164), you should consider whether SEA and AA screening may be required.	Noted. Coillte commits to applying all relevant statutory and regulatory processes, including SEA and AA screening where required. The LUSIP provides high-level guidance and does not list every regulatory process that may be associated with specific actions, which will be addressed on a project-by-project basis.
61	EPA	Policy Alignment, Governance & Implementation	We suggest an additional alternative to explore whether the various pillar actions will be implemented equally or on a phased / priority basis and either nationally, or at a BAU level.	The LUSIP actions are derived from the FESLUP where alternatives were explored on how the implementation of each pillar are prioritised.
62	EPA	Monitoring, Evidence & Environmental Assessment	There is merit in establishing a monitoring subgroup to develop the SEA related monitoring programme for the LUSIP over its lifetime.	Noted. However, the LUSIP is intended to remain a strategic-level plan. Coillte will provide a formal progress report at the 5-year LUSIP review, rather than establishing a separate monitoring committee. This ensures consistency with the Plan’s governance framework.
63	EPA	Monitoring, Evidence & Environmental Assessment	We suggest that the monitoring report(s) for the LUSIP (and the associated SEA) are published at appropriate intervals over its lifetime and made available on your website.	Monitoring will be done regularly, and a reporting milestone summarising progress and outcomes will be issue at the 5-year LUSIP review. Findings from this review will inform adjustments to actions and priorities for the next phase of implementation.
64	NPWS	Environmental Protection, Restoration & Compliance	Firstly, no reference has been made to the existing Code of Practice between the National Monuments Service of this department and Coillte (https://www.archaeology.ie/app/uploads/2025/02/code-of-practice-coillte-EN.pdf). This should be explicitly	Thank you for highlighting the Code of Practice between the National Monuments Service (NMS) and Coillte. Coillte is fully cognisant of the requirements of this Code of Practice and values its ongoing liaison with the NMS in relation to the protection and management of

			referenced with a commitment to carry out any and all projects under LUSIP in alignment with this Code of Practice and any future updates, amendments or revisions to it.	archaeological heritage. The principles of the Code of Practice are taken into account in the governance and implementation of projects and activities arising under the LUSIP, and engagement with the NMS will continue as appropriate.
65	NPWS	Environmental Protection, Restoration & Compliance	Archaeological Impact Assessment (AIA) must be carried out as part of any mandatory Environmental Impact Assessment (EIA) in order to assess the potential effects of a project on archaeological heritage. However, for projects, plans and developments where EIA is not mandatory, then AIA may still be necessary on a standalone basis to ensure that potential effects of any proposal on archaeological heritage are identified and appropriately considered as part of the informed decision-making process. This is essential to ensuring that developments are planned and carried out in a way that promotes the protection and enhancement of our archaeological heritage. Certain types of project referenced in this appendix should always have advance AIA carried out e.g.: • New forestry projects • Peatland redesign projects • Renewable energy developments or grid infrastructure developments (where type or scale not subject to mandatory EIA) • New buildings/structures This is necessary both to inform the design of the project (and maximise opportunities to minimise negative effects on archaeological heritage by design) and to ensure that appropriate, adequate and correctly targeted mitigation measures for the protection of archaeological heritage are put in place.	Noted. The importance of appropriately identifying, assessing and mitigating potential impacts on archaeological heritage is acknowledged. The requirement for Archaeological Impact Assessment (AIA) is already addressed through existing statutory and regulatory frameworks governing forestry, land use and development activities. These include, but are not limited to, the DAFM Protocols for Afforestation, the DAFM Protocol for Coillte Felling Licence Applications, and relevant planning legislation and consent processes. The LUSIP operates within relevant regulatory frameworks applicable at project level.

66	NPWS	Environmental Protection, Restoration & Compliance	There are repeated commitments to carry out ‘archaeological surveying’. In The Departments view this is insufficient, what is needed is a commitment to carrying out rigorous AIA. ‘Archaeological surveying’ would form part of the information gathering for AIA, but this should be in parallel with other methods such as desk-top studies, archaeological geophysical survey and archaeological test excavation. The full impact assessment process is essential to ensuring the protection of archaeological heritage in the context of any proposed development or change in land use strategy.	Coillte acknowledges the importance of rigorous assessment of potential impacts on archaeological heritage. Projects and activities will be carried out in compliance with all relevant statutory and regulatory frameworks, which provide for appropriate assessment, surveying, monitoring, and management measures, including professional input where necessary. The LUSIP provides high-level guidance and is not intended to prescribe project-level assessment methods.
67	NPWS	Environmental Protection, Restoration & Compliance	The Department notes the commitment to carrying out archaeological monitoring as part of mitigation measures to protect archaeological heritage. However, in The Departments view, this is inappropriate as a default position. Archaeological monitoring should be a considered outcome at the end of an AIA process. Provision must be made for the application of a broader range of mitigation measures including, in particular, for avoidance/mitigation by design (supported by the appropriate exclusion zones). National policy as detailed in Framework and Principles for the Protection of the Archaeological Heritage (Government of Ireland, 1999) is that there should always be a presumption in favour of avoiding developmental impacts on archaeological heritage.	Coillte notes the importance of avoiding impacts on archaeological heritage. As set out in the Environmental Governance Framework of the LUSIP, Archaeological Impact Assessment will be carried out where necessary, and appropriate avoidance-by-design and mitigation measures, including monitoring where required, will be integrated into projects in line with Planning Authority and National Monuments Service requirements.
68	NPWS	Environmental Protection, Restoration & Compliance	• NO2.A2 Develop markets and supply chain to optimise timber produced from CCF management actions. Diversifying end markets will support CCF implementation. It is not clear how developing this market will lead to benefits to biodiversity as a result of CCF in this	Coillte recognises that Continuous Cover Forest (CCF) management, is an important approach to managing forests for nature. CCF maintains a forest environment while gradually diversifying the structure and species composition of forest stands, thereby increasing their habitat value. It is important that there are markets for the

			document. Whilst it is recognised that CCF can bring about biodiversity benefits, this is likely to be optimal when the market is at a sustainable level of demand.	timber produced by CCF. Development of markets and a supply chain for the timber produced will encourage implementation of CCF.
69	NPWS	Environmental Protection, Restoration & Compliance	Ambition 6 lacks commitment to share biodiversity data with stakeholders such as National Biodiversity Data Centre and the NPWS. It is recommended that a minor revision to the wording is made.	Noted. We acknowledge the importance of building shared knowledge and have amended NO05.A4 to "Develop a process for recording and reporting species (flora and fauna), and for sharing data with relevant stakeholders, to build our knowledge of their occurrence across the estate and to better inform appropriate protection measures." to reinforce our commitment to data sharing and stakeholder engagement.
70	NPWS	Environmental Protection, Restoration & Compliance	It is recommended that a commitment is included to support the delivery of conservation measures in partnership with NPWS and other bodies to help achieve conservation objectives for European sites.	Coillte's commitment to supporting conservation objectives for European sites is reflected in Actions N013.A1 and N013.A2. In particular, N013.A2 highlights ongoing engagement and partnership projects with NPWS and other relevant agencies to deliver management actions and enhance species and habitats.
71	NPWS	Environmental Protection, Restoration & Compliance	NO18 Collaborate and engage as a key partner with the ongoing preparation of the Deer Management Strategy and seek to implement once published, in so far as possible and appropriate. NO18.A1 Through the Deer Management Forum, assist in the development of Irish Deer Management Strategy and once developed, update processes to implement the recommended measures. National 2026 – 203. The correct term for the group should be the Irish Deer Management Strategy Group (IDMSG)	Noted. Action NO18.A1 has been amended to "Through the Irish Deer Management Strategy Group (IDMSG), assist in the development of Irish Deer Management Strategy and once developed, update processes to implement the recommended measures."
72	NPWS	Monitoring, Evidence &	Monitoring Commitments: Area of biodiversity interventions implemented per year (ha) This commitment, whilst supported, should be amended	Coillte agrees that it is important to monitor the effectiveness of management interventions. The actions listed under Objective N05 reflect a commitment to develop an approach to monitoring habitats, species and

		Environmental Assessment	to ensure that it also addresses whether such interventions are successful/effective or not.	the ecological benefits of biodiversity management actions.
73	Uisce Éireann	Environmental Protection, Restoration & Compliance	The plan outlines that Coillte proposes projects such as rewetting/rehabilitation and transitioning to semi-natural forests, which UÉ welcomes due to potential benefits to water quality and downstream drinking water sources. UÉ would welcome any engagement and collaboration with Coillte on peatland projects that are located within UE drinking water abstraction catchments which could be beneficial to nature, climate and improved drinking water quality.	Thank you for your comments and for highlighting the potential benefits of working together. Coillte appreciates Uisce Éireann's support for our nature-based and peatland projects and welcomes your openness to engage on matters related to water quality and drinking water catchments.
74	Uisce Éireann	Environmental Protection, Restoration & Compliance	UÉ would be happy to engage with Coillte on any nature-based opportunities that may benefit water quality and our downstream abstractions.	Noted. Coillte acknowledges, with thanks, the offer to collaborate on any nature-based opportunities that may benefit water quality and downstream abstractions.
75	Uisce Éireann	Environmental Protection, Restoration & Compliance	As outlined in NO15, a number of drinking water abstractions are located withing Coillte estates. UÉ would welcome any engagement or collaboration with Coillte on how they could play a role in enhancing water quality in drinking water catchments.	Noted. Coillte acknowledges, with thanks, the comments regarding drinking water abstractions and is open to collaboration on water quality matters.