

From: NF

Sent: 07 March 2019 11:31 AM

To: ECE-Aarhus-Compliance <aarhus.compliance@un.org>

Subject: RE: Next Monday's open session on the preliminary admissibility of communications PRE/ACCC/C/2019/164 and PRE/ACCC/C/2019/165 (Ireland)

My apologies for not being able to attend in person or by dial up. This is due to an existing important domestic commitment.

In bringing this communication before the Committee I wish to put a strong emphasis on the context.

Irish Government Forestry Policy is to increase the area under 'forest' cover from 11% at the start of the programme to 18% by 2046.

This is a significant change in land use which has the potential to have a significant effect on the environment so the means by which this end is achieved are important. The implementation of this policy at ground level impacts on individuals, communities and the environment. Therefore the engagement and participation of the public is important not only at the strategic and planning level but also in its implementation. My communication applies to the latter.

The notification and public consultation procedures employed by the Forest Service of the Department of Agriculture, Food and the Marine relate to hundreds of individual cases annually (for a considerable period of time) right across the country*.

If the procedures are inadequate or ineffective then the potential for public participation is reduced and the opportunity for positive influence diminished.

To the best of my knowledge the Department has not carried out any assessment of the adequacy or effectiveness of its notification or consultation procedures.

It is my contention that the procedures employed by the Forest Service are failing to meet the principles of the Aarhus Convention in ensuring that public consultations are being carried out in an *adequate* and *effective* manner. I have requested that the Department carries out a review of these procedures and their compliance with the principles of the Aarhus Convention. They have refused to do this. I do not have the resources to consider taking any legal action against the Department and in the absence of other options I decided to make a submission to your Committee. I trust that my communication is valid and thorough and I thank you for your time in considering it.

If the Committee consider that my communication is admissible I would be happy to provide any additional information or clarification that may be required. If not, I apologise for unnecessarily taking up the the time of the Committee and the staff involved.

Yours Sincerely,

Neil Foulkes

**I cannot provide you with definitive figures because the Department only publishes records on a week by week basis. There is no overall presentation of data. This means that any annual assessment would involve accessing 50+ separate webpages for each of the three schemes.*