



25th June 2025

Subject: Appeal FAC090/2023 against afforestation licence CN90863

Dear Sir,

I refer to the appeal to the Forestry Appeals Committee (FAC) in relation to the above licence granted by the Minister for Agriculture, Food and Marine (the Minister). The FAC, established in accordance with Section 14 A (1) of the Agriculture Appeals Act 2001, as amended, has now completed an examination of the facts and evidence provided by the parties to the appeal.

Hearing

A hearing of appeal reference FAC090/2023 was held remotely on the 15th April 2025. In attendance:

FAC Members:	Mr. Seamus Neely (Chairperson), Mr. Derek Daly & Mr. Luke Sweetman.
FAC Administration:	Ms. Aedín Doran

In the particular circumstances of this case, the FAC considered that it was not necessary to conduct an oral hearing in order to properly and fairly determine the appeal.

Decision

Having regard to the information before it, including the record of the decision on the Forestry Licence Viewer (FLV), the notice of appeal, and the Statement of Fact (SOF) from the Department of Agriculture, Food, and the Marine (DAFM), the FAC has decided to set aside and remit the decision of the Minister to grant afforestation licence CN90863 for the reasons set out hereunder.

Background

The licence under appeal is for the afforestation of 4.64ha of mixed across two plots in Lecarrow lower, Co. Clare and was issued on the 22nd November 2023. The licence approval letter states that Plot 1 will comprise 4.06ha of mixed broadleaves and Plot 2 will be a Bio plot of 0.58ha. The licence was issued with standard conditions 1-4 and Condition 5 which specifies additional requirements including adherence to the mitigation measures set out in the Appropriate Assessment Determination, dated 14th November 2023, and a list of archaeological conditions.

The "Site Details Report" indicates that the proposal site is currently enclosed agricultural land underlain by both mineral and peat soils, has a neutral aspect, and is not exposed. The current vegetation type is Grass/Rush and site access is "adequate". The DAFM's Appropriate Assessment documents state that the average slope across the site is moderate at 4%, and the soil type is "Surface Water Gleys/Ground Water Gleys (48%), Surface Water Gleys (Shallow)/Ground Water Gleys (Shallow) (2%) and Surface Water Gleys (Shallow)/Ground Water Gleys (Shallow) (50%)". The FAC noted that the DAFM's AA documents indicate that there are no peat soils present on site.

Information available online from the Environmental Protection Agency (EPA) shows that the proposal is in the Cloghaun_030 River Sub-Basin. Catchments.ie shows the Cloghaun_030 River Waterbody currently has "Good" status (high confidence) and is "Not at Risk". The proposal is underlain by the Lough Graney Ground Waterbody which also has "Good" status and is "Not at Risk". The nearest EPA-mapped watercourse is the Cloghaun 25 (Order 4) which is between 270-400m south of the proposal.

DAFM Assessment to Determine EIA Requirement

The DAFM completed an Assessment to Determine EIA Requirement, certified 16th November 2023, which considered the proposal's potential impact on the environment across a range of criteria before concluding that the application should not be subject to the EIA process.

The FAC noted that under "Project Location" the DAFM Forestry Inspector answered "N/A" to the question regarding existing and approved land uses, and that the cumulative effect of the project would be "0". The Inspector stated that there is not likely to be a significant cumulative impact on the environment from this project when considered in conjunction with the impact of other existing and/or approved afforestation projects. The reasons that led to this decision are stated to be "Answer based on Appropriate Assessment Determination in CONTACTS".

Under "Natural Resources: Soil & Wetlands" the Inspector stated that the project contains an area listed in the Wetland Survey of Ireland and this sensitivity has been addressed by "Ecology Section" and resulting recommendations applied, either through project redesign or conditions to be attached to the afforestation licence.

Appropriate Assessment (AA)

On file is a document titled "Appropriate Assessment Screening Report & Determination for Afforestation project CN90863, at Lecarrow Lower, Co. Clare" (AASRD) produced by Envirico Ltd on behalf of the DAFM and dated the 2nd February 2023. The map on the cover of the AASRD shows a redline boundary of the proposal which is greatly reduced compared to the boundary on the Forestry Licence Viewer (FLV) and other maps on file (e.g., Bio Map, Fencing Map). The project description states the total area is 2ha as opposed to the 4.64ha approved in the licence.

The AASRD indicates that the National Parks & Wildlife (NPWS) response and third-party Submission (from the eventual Appellant) was taken into consideration in undertaking the AA screening. Nine European Sites within 15km were screened for AA. Eight of these were screened out with reasons provided, mostly due to separation distance. The Slieve Aughty Mountains SPA was screened out and the reason for this screening conclusion is redacted on the FLV but refers to Hen Harrier foraging range. The Lough Derg (Shannon) SPA (6.6km east of project) was the only site screened in and the reason was "due to hydrological connectivity between the project site and the SPA. A relevant watercourse connects with the River Graney approx. 295m SW of the project site".

The AASRD does not contain an In-Combination Report for screened-out sites and there appears to be no In-Combination Report for screened-out sites on the FLV.

AA Report (AAR)

On file is an "Appropriate Assessment Report for Afforestation project CN90863, at Lecarrow Lower, Co. Clare" which was also produced by Envirico Ltd on behalf of the DAFM and dated the 2nd February 2023. The AAR states that "The purpose of this Appropriate Assessment Report is to evaluate whether the project, individually or in combination with other plans and projects, would have an adverse effect on

the integrity of any European Site, in view of that European Site's conservation objective(s) and best scientific knowledge."

Section 2 "Information" states "Combined with the site and project details (including maps) contained in the AASRD for the project, adequate information was available to undertake an appropriate assessment."

Section 3 states that mitigation measures are required due to the possibility that "a deterioration in water quality as a result of the project may have adverse impacts on the conservation objectives of [A999]" (Wetlands and waterbirds)." Section 4 outlines the prescribed mitigation measures which mainly relate to the protection of water quality.

Section 5 relates to In-combination effects and states "As set out in Appendix A, it is deemed that this project, when considered in combination with other plans and projects, will not give rise to any adverse effect on the integrity of any European Site."

Section 7 "AA Determination" states that:

It is concluded that the proposed Afforestation project under CN90863, with mitigation measures identified, will itself (i.e. individually) not result in any adverse effect or residual adverse effects on the integrity of the European site(s) listed above. The project was also considered in combination with other plans in the area that could result in potential significant cumulative effects on these European site(s). No potential significant cumulative effects are predicted with the plans and projects listed in Appendix A.

The AAR contains Appendix A "Appropriate Assessment Screening Report and Determination Appendix A: In-combination report for Afforestation project CN90863". This report states that various online planning systems and datasets (including DAFM's FLV) were consulted on the 17th November 2022 in order to identify other plans and projects, focusing on the general vicinity of the project area in the River Sub-Basin Cloghaun_030. Objectives relating to Natura 2000 sites set out within the Clare County Development Plan 2017- 2023 were also consulted. The In-Combination Statement states that at 4.64ha, the proposed project is considered small in scale. The In-Combination Report concludes that (emphasis added):

there is no possibility that the proposed Afforestation project CN90863, with mitigation measures set out in Section 4, will itself, i.e. individually, giving rise to an adverse effect on the integrity of the following European Sites and their associated Qualifying Interests / Special Conservation Interests and Conservation Objectives: Lough Derg (Shannon) SPA IE0004058 Therefore, there is no potential for the proposed project to contribute to any cumulative adverse effect on the integrity of the above European Site(s), when considered in-combination with other plans and projects.

AA Determination (AAD)

On file is an "Appropriate Assessment Determination for Afforestation project CN90863, at Lecarrow Lower, Co. Clare" prepared by Envirico Ltd on the 14th November 2023. In Section 1 "Overview", the AAD states in relation to screened-out European sites that:

In concluding the AA screening, the Minister has determined that there is no likelihood of the Afforestation project CN90863 having any significant effect, either individually or in combination with other plans or projects, on any of the following European site(s), in view of their conservation objectives, for the reasons described.

Section 3 "Appropriate Assessment" states that in undertaking the AA, the following were taken into account (emphasis added):

...the AA Screening Report and Determination for this project, which is evidence of the required evaluation of any potential significant effects that may arise as a result of the proposed project on European Sites (at no stage during the screening process were measures intended to avoid or reduce any potential effects to European sites considered);

...The project site was field inspected on 18/10/2023 and was found to be composed of mineral soil.

*...Additional information in relation to the Appropriate Assessment **An up to date In-combination report (attached to file) was considered** to ensure that conclusions reached regarding European sites remain accurate".*

Section 4 "Appropriate Assessment Determination" states that it was determined that adequate information was available to enable an AAD to be reached for this project and that the Minister has carried out the AA of the potential impacts of the likely significant effects of Afforestation project CN90863 on the screened-in European sites and has made certain, based on best scientific knowledge in the field and the European Communities (Birds & Natural Habitats) Regulations 2011 (as amended) and the Forestry Regulations 2017, as amended, and Article 6(3) of the Habitats Directive, that the proposed project, individually or in combination with other plans or projects, will not adversely affect the integrity of any of the aforementioned European Sites, having regard to their conservation objectives, "provided the following mitigation is implemented..." and various mitigation measures are described.

The AAD states that the basis for the AA Determination is as follows:

The proposed project is not located within Lough Derg (Shannon) SPA IE0004058 but is hydrologically connected to this European site. However, the details of the proposed works and mitigations described above will ensure that the project will not adversely affect the integrity of this European site. These details will protect water quality and riparian areas/etc. and, as such, protect aquatic qualifying interests and (e.g. supporting habitats and/or species of terrestrial qualifying interests).

The AAD states that in-combination effects were assessed "prior to meeting this determination" and that "the mitigations outlined will ensure that the proposed project will not represent a source and, as such, there is no potential for the project to contribute to any significant cumulative effects, when considered in combination with other plans and projects." The DAFM deemed that the proposed project, when considered in-combination with other plans and projects, "will not give rise to the possibility of significant effects on any European site. Therefore, the Minister for Agriculture, Food & the Marine has determined, pursuant to Regulation 42(16) of the European Communities (Birds and Natural Habitats) Regulations 2011 (as amended) and Regulation 19(5) of the Forestry Regulations 2017 (as amended), based on objective information, that no reasonable scientific doubt remains as to the absence of any adverse effect on the integrity of any European site."

There is an Appendix to the AAD titled "Appropriate Assessment Report Appendix A: In-combination report for Afforestation project CN90868" which appears to have been attached in error and relates to a different project with a similar contract number (CN90868) located in Co. Roscommon.

Referrals & Submissions

The DAFM's SOF indicates that the application was referred internally to their Ecology and Archaeology sections. There is an archaeology report on file but there appears to be no ecology report published on the FLV.

The application was also referred to the National Parks and Wildlife Service (NPWS) and a response was received stating that the NPWS "has no comment to make on this application". The NPWS also submitted an appendix with a list of more general observations on their role in relation to nature conservation, including as a consultation body with respect to forestry developments.

There was one third-party submission on the application, from the Appellant in FAC090/2023. This submission included substantial detail and maps and is appended to the Appellant's NOAF.

Grounds of Appeal

There is one third-party appeal (FAC090/2023) against the decision to grant CN90863. The grounds of appeal were considered in full by the FAC and the following is a summary:

The Appellant states that they wish to object to the afforestation licence in an area "designated as wetland and of ecological value". The Appellant acknowledges some concerns raised in their submission on the application were addressed by the DAFM (e.g., archaeology & other site conditions) but raised the following as grounds of appeal.

1. AAD errors - Mapping issue. Only 2ha in Plot 1 has been assessed in AA documents. Licence approval is for over 4ha. From page 7 - 23 the AAD references a different project, in Roscommon, and the River Suck basin. The Appellant refers to correspondence between the Appellant and the DAFM where the DAFM states that the southern portion of the project was excluded at request of the Ecologist. There is no ecology report on the FLV.
2. Dwelling setbacks - refers to original submission. States no revised map showing appropriate setbacks.
3. Site Entrance. As per submission. Unclear where access will be. Current road access not suitable.
4. Enclosure. House will be surrounded on all sides bar the north if planting goes ahead. Views of the valley to south will be impacted. Changing the planting plan to allow sight lines would greatly address this issue.
5. Access. Unsuitable. Future removal of trees not possible.
6. Fire hazard raised in submission not addressed.
7. Fencing. As per submission. No revised fencing map showing deer/rabbit fencing.

8. Biodiversity. As the AAD "does not cover the key area of the site that was of concern relating to the bogland in the lower area, I am very concerned about this section in particular. I would like confirmation that this area of the site will not be planted."

Section 2.5.1 of the Environmental Requirements for Afforestation (ERA) lists wetland habitats which must not be planted. Areas overlapping with the wetland survey of Ireland must not be planted. Lecarrow Lower Bog classified as B rating. Nationally Important. Site code WMI_CL804. Screenshot included in NOAF. The survey that informed the wetland survey of Ireland was undertaken by the RPS group on behalf of Clare CoCo and is online at: [Survey and Mapping of Habitats in Mid Clare](#).

The Appellant would like confirmation that areas recorded in the survey will not be planted.

9. Soil sample depth. The Appellant requests an assessment under the DAFM's Land Types for Afforestation; Soil & Fertility document.
10. The Appellant requests that the upper section of site be reassessed for its ecological value as AAD suggests only grass has been observed on the site. The Mid-Clare habitats survey (linked above) found the site area to be of "moderate ecological value with good species diversity".
11. The Appellant requests that a number of additional surveys/reports be undertaken:

DAFM SOF

The Minister provided an SOF responding to the grounds of appeal which is summarised below:

1. **AAD**

The in-combination text in the AAD (dated 14th November 2023) includes errors relating to the catchment and local authority details. The AAR (dated 2nd February 2023) which went for public consultation used the correct data as part of the in-combination text. "The Department relied on the information contained in the AAR when assessing in-combination impacts"

2. **Setback Areas**

Plot 2 is a Bio containing open space with no trees planted. A 60m dwelling setback applies and is shown on the Bio Map dated 20th May 2022.

3. **Site Entrance**

The site entrance is confirmed on the Bio Map. The Location Map dated 20th May 2022 indicates that the road referred to by the appellant is a public road. Under the Roads Act, the Local Authority may prosecute where any person damages the public road, there is no role for DAFM in this assessment.

4. **Impact on Neighbouring House**

The Appellant's concerns addressed by the 60m setback as per ERA which is part of the licence conditions.

5. **Access**

There is no timber harvesting proposed. The proposed planting is of native broadleaf species. Continuous cover forestry is envisaged. Currently it is not practical or feasible to install a full bell

mouth into the site which is required for harvesting operations. When required, various options will be assessed and where required an application will be submitted by the Applicant to the Forest Service or Local Authority regarding opening or widening an entrance. There are no characteristics on site which would be insurmountable and prevent an entrance being opened at some point along the public road with appropriate mitigation measures built into the plan.

6. Fire

Fires mostly spread from adjoining lands into forests. Potential fire risk has been assessed. Based on vegetation present, the DAFM is satisfied the risk of fire is low/very low. The proposed plantation itself is not a fire risk and no additional measures are required.

7. Fencing

Areas to be fenced are on a fencing map dated 20th May 2022. Stock fencing is proposed and is deemed acceptable for this proposal.

8. Biodiversity - AAR is "inaccurate"

The Wetland survey results/mapping are indicative. A site inspection was carried out by the DAFM and found that no wetland habitat exists within this proposed area. If applications (or parts of) fall within the Wetland Layer, a site inspection is carried out to ascertain if the area is in fact a wetland. Areas of wetland are not planted. It was found in this case that no such wetland area existed on this planting proposal.

9. Soil Sample Depth

The site was field inspected on the 18th October 2023. This confirmed the application area did not contain any peat. The soil type found was brown earth. Pictures uploaded to FLV on the 22nd November 2023 confirm this.

10. & 11. Surveys

The DAFM has conducted all necessary assessments for this proposal. "This proposal is for the planting of native woodland (FT1) which will greatly enhance the biodiversity value of the local area."

Considerations of the FAC

The remit of the FAC, as set out in Section 14B of the Agriculture Appeals Act 2001, as amended, is to consider appeals against specified decisions of the Minister and to determine if a serious or significant error, or a series of errors, was made in making the decision under appeal, and if the decision was made in compliance with fair procedures. The FAC considered all the submissions and material provided to it by the parties, including the record of the decision on the FLV.

1. The FAC found that the Appellant correctly identified errors in the AAD for this proposal. The AAD states in Section 3 that "An up to date In-combination report (attached to file) was considered to ensure that conclusions reached regarding European sites remain accurate". However, as alluded to previously in this letter, there is an Appendix to the AAD titled "Appropriate Assessment Report Appendix A: In-combination report for Afforestation project CN90868" which appears to have been attached in error and relates to a different project with a similar contract number (CN90868) located in Co. Roscommon.

Regarding the DAFM's in-combination assessment of the proposal, the FAC found that the AASRD does not contain an In-Combination Report for screened-out sites and there appears to be no In-Combination Report for screened-out sites on the FLV.

The FAC noted that the In-Combination Report for the screened-in site (Lough Derg (Shannon) SPA), contained in an Appendix to the AAR, states "In-Combination Statement completed on the: 17/11/2022". However, this In-Combination Statement relies on "mitigation measures set out in Section 4" of the AAR, a document which was not prepared until the 2nd February 2023. The In-Combination Statement contends that, as the proposal will not give rise to an adverse effect on the integrity of the Lough Derg (Shannon) SPA, "there is no potential for the proposed project to contribute to any cumulative adverse effect". The FAC considered that this statement indicates that the DAFM did not consider potential effects arising from the proposal which are not significant individually but may result in an adverse effect in combination with other plans and projects. The FAC considered the foregoing errors to be a series of significant errors in the DAFM's consideration of the licence application.

The grounds of appeal include email correspondence between the Appellant and the DAFM (forestryappeng@agriculture.gov.ie) which appears to confirm that, following consideration by the DAFM ecologist, a section of the original proposal had been removed from the application. The AASRD seems to have been conducted on this basis as it describes the project area as 2ha. The AASRD, AAR, and AAD all include a map on the cover page indicating a reduced area (of totalling approximately 2ha) compared to the application maps. The AAR was predicated on the findings of the AASRD which appears to have considered the proposal as covering a total of 2ha. However, the in-combination report in the AAR describes the project as being 4.64ha and the licence approval letter also states this as the area approved for afforestation. There appears to be a discrepancy across the record of the file on the FLV between the area that is recorded as having been considered in the DAFM's AA process, and the area which has been approved for afforestation. The FAC considered this to be a significant error in the DAFM's processing of the application.

2. The FAC found that the Bio Map dated 20th May 2022 shows the boundary of the plots applied for in a red outline. Plot 1 is labelled "505" and Plot 2 is labelled "877". The FAC understands these labels to be a function of the DAFM's digitised mapping system. The Bio Map legend indicates that dwellings will be marked with a grey circle but there is not such annotation on the map. However, the aerial imagery used for the Bio Map clearly shows a building adjoining Plot 2 which has a text box label which states "60 m set back from the residence". The licence approval letter also shows that Plot 2 is a Bio plot, and no trees will be planted there. Additionally, Licence Condition 2 states "The afforestation project and all associated operations shall be carried out and completed in accordance with the measures set out in the Environmental Requirements for Afforestation and the Forestry Standards Manual (as amended by periodic Circulars)". The FAC found that the ERA details the minimum requirements for utilised buildings and that 60m is the minimum requirement in the absence of written agreement from the neighbouring dweller, where a 30m setback is permissible. On the balance of the evidence before it, the FAC found that the Bio Map should have included a visual marker showing the location of the neighbouring dwelling but that this residence is clearly shown and highlighted by the use of a text box and arrow, and the required 60m setback has been applied by the DAFM. As such, the FAC found that the DAFM did not err in relation to this ground of appeal.

3. The decision before the FAC relates to an afforestation project, and not a forest road, or a felling proposal. The FAC noted that the Bio Map clearly shows the access point from the application site to the public road. The DAFM's SOF states that no timber harvesting is proposed, and it is envisaged that the forest will eventually be managed as Continuous Cover Forestry which is a low impact silvicultural system. Notwithstanding this, the FAC considered that the level of traffic generated by the afforestation project would not be greater than any typical agricultural practice and would be lower for a number of years after establishment and before any potential forest road works or thinning operations. The evidence before the FAC is that access for the licenced operations is adequate. The FAC consider that should the landowner seek to fell trees in the future, they would require a tree felling licence and would be required to adhere to any related conditions in addition to any laws regarding the standard of the access road and the use of public roads.
4. The FAC found that the 60m setback from the Appellant's dwelling required by the licence conditions will result in no planting to the west of their home. The proposed planting will begin 60m to the south of their dwelling and will consist of native broadleaf species. The FAC found that the DAFM did not err with regard to this ground of appeal.
5. See point 3 above.
6. The proposed afforestation project is for native broadleaves and includes a 60m setback from the Appellant's dwelling. The FAC found that there is no convincing evidence before it to support the Appellant's contention that the proposal represents a fire hazard.
7. The FAC considered that the proposed operations were submitted by a Registered Forester (including a Fencing Map dated 20th May 2022) and assessed by a DAFM Forestry Inspector and that both concluded neither deer or rabbit fencing were required in this case. The FAC is satisfied that the DAFM did not err in relation to this ground of appeal. However, the FAC noted that the operational proposals set out in Appendix A of the approval letter, except for 520m of stock fencing, are described as "Not Entered". The FAC considered that in the particular circumstances of this case, where the proposed operational details are included on file in the "Inet Pre Approval Submission Report" as well as the AASRD, the FAC considered the failure of the DAFM to transpose the Operational Details into the licence approval letter to be a clerical error which is not serious or significant. As this decision is being set aside and remitted for other reasons, the FAC considered that, if it transpires that a new approval is issued, the DAFM should ensure that the approved operational details are included in the approval letter.
8. In considering this ground of appeal, the FAC had regard to the DAFM's SOF which stated that "The Wetland survey results/mapping are indicative. A site inspection was carried out by the DAFM and found that no wetland habitat exists within this proposed area." The FAC found that there is no field inspection or ecology report on the record of the file and so, as highlighted by the Appellant in this ground of appeal and by the FAC previously in this letter, it is unclear if the DAFM decided to exclude the "bogland in the lower area" from this proposal. As outlined under Point 1, the FAC consider this to be a significant error in the DAFM's processing of the licence application.
9. The DAFM's SOF states that "the site was field inspected on the 18th October 2023. This confirmed the application area did not contain any peat. The soil type found was brown earth."

The DAFM also referred to photographs which are on the FLV which appear to support their contention regarding the soils on-site. However, as highlighted previously, there is no field inspection or ecology report on the record of the file. Notwithstanding this, the FAC considered that these grounds relate to afforestation scheme requirements. The DAFM's "Land Types for Afforestation: Soil & Fertility" document sets out the "potential eligibility of land for support under the Afforestation Scheme", based on two primary considerations: soil type and the level of site fertility. The FAC would understand that its remit does not extend to determining appeals in relation to entitlements under the afforestation scheme, as set out in Schedule 2 of the Agriculture Appeals Act 2001 as amended.

- 10. & 11.** The decision under appeal is being set aside and remitted to the DAFM. The FAC consider that the DAFM are the competent authority with regard to afforestation licencing and, in processing the licence application, should satisfy themselves that the proposal has been assessed in line with all legislative requirements.

In considering the grounds of appeal and the file record, the FAC found that the DAFM's EIA screening document appeared to contain a number of errors. As outlined previously, the DAFM completed an "Assessment to Determine EIA Requirement", which considered the proposal's potential impact on the environment across a range of criteria before concluding that the application should not be subject to the EIA process. Under "Project Location" the cumulative effect of the project is stated to be "0". Given the presence of a broadleaf forestry plantation adjoining the proposal to the north-east, and the existing forestry visible on the FLV in the vicinity of the proposed project, the FAC considered that the DAFM should have contextualised this finding with commentary and/or further information.

The FAC noted that the DAFM Forestry Inspector stated that there is not likely to be a significant cumulative impact on the environment from this project when considered in conjunction with the impact of other existing and/or approved afforestation projects. The reasons that led to this decision are stated to be "Answer based on Appropriate Assessment Determination in CONTACTS". The FAC considered that this could mean that the in-combination assessment completed as part of arriving at an AAD informed the Inspector's decision regarding the cumulative impact of the proposal under CN90863. However, this is not clearly stated. Additionally, the AAD referred to by the Inspector was found to contain an erroneous In-Combination Report for a completely separate project (in Co. Roscommon) and therefore cannot be relied upon to inform the DAFM's EIA screening.

Based on the evidence before it, as outlined above, the FAC is satisfied that a number of serious or significant errors were made in the DAFM's decision to issue CN90863. In these circumstances, the FAC decided to set aside and remit the decision to the Minister to undertake a new screening for AA, a new EIA screening, and to address the other errors identified previously in this letter before making a new decision in relation to the application for CN90863.

Yours Sincerely,

Luke Sweetman on behalf of the Forestry Appeals Committee

