



Confor
Promoting forestry and wood
Hyrwyddo coedwigaeth a choed

Policy Support Unit

Welsh Government

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Please see below the Confor Response to the consultation on NNRP which includes the tables and graphs that the online submission prevent us from including.

Confor Response to the consultation on NNRP

Accelerating green growth by increasing resource efficiency, renewable energy and supporting innovation

entirely misses the point that we need to increase our usage of resources produced from sustainable and renewable resources to **replace** the usage of non-renewable resources. Timber produced in Welsh forests is the ideal raw material, it can and should be used to replace products made from non-renewable sources.

We also need to increase our usage of products from resources that are less carbon intensive in their manufacture and reduce the use of high carbon embodied products. Again timber fulfils this requirement.

Increasing resource efficiency is desirable but unless the resource is sustainably produced in the first place it is an entirely misplaced concept. If any product is made of materials from unsustainable supply chains then no matter how much we reduce consumption we would still be using resources from unsustainable sources and that is against all the aspirations of the wellbeing and future generations act. The reference to reducing our use of virgin materials is counterproductive if the virgin material is both renewable and sustainably produced, as is the case with forest products. The reference to should be either removed or amended as to say reducing our use of resources from non-renewable sources.

Sustainable materials grown and produced in Welsh forests start off as a net carbon sink, helping to reduce the carbon debt that the WG has to address. Timber produced by the Welsh forestry sector is the ultimate sustainable resource and we should seek to expand and promote that. NNRP needs to acknowledge that.

Forestry and wood processing is the classic sustainable sector; trees harvested to create the everyday wood products that society needs can be replanted in a never-ending cycle. Unlike other sectors, an increase in the economic activity of the forestry sector also delivers additional environmental benefits as trees soak up carbon and wood products store carbon. Productive forestry also provides many other benefits for society, including recreational facilities, biodiversity habitats, and water management and flood prevention.

Resource efficiency is driven by the circular economy concept, timber products produced by Welsh forests are an exemplar of the circular economy in that they are produced and replenished sustainably, they are reusable with many different uses throughout their product life and ultimately used to replace fossil fuels in energy production.

Although using forests and wood as a source of biomass is sustainable energy, the undesirable consequence of pursuing an increase in renewable energy from biomass is to reduce the available resource for existing timber products. The forestry sector welcomes biomass as another market for the forest products and will continue to promote the new opportunities this market presents, however we wish to see the production of energy from biomass increase in scale in addition to the present markets for timber products not at the expense of existing markets. Our support for the increase in renewable energy from biomass is conditional on a commensurate increase in the forest area and resource to supply the increase demand.

Delivering nature-based solutions to improve resilience and the benefits derived from natural resources. Many of the benefits derived from natural resources, mostly provided by woodlands, are enjoyed by all of society, they are

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spelt out clearly in woodlands for Wales strategy and an increase of forest cover in Wales will help deliver many more.

Forests and trees provide different benefits and solutions depending on what and where they are. Urban trees and woodlands help remove air pollution, reduce temperature in towns and cities, assist with SUDS and provide biodiversity habitats and recreation facilities in badly needed areas.

The larger forests in rural areas also provide many benefits to the urban population and these benefits are often much greater thanks to the larger scale of these forests. The air we breathe is cleaner and less polluted thanks to the trees scavenging the pollutants out at a huge scale. Trees can reduce the water flow, helping to reduce the risk of flooding many miles downstream.

These larger, often commercial, forests also provide timber, the raw material on which a huge industry relies on. This industry provide many well paid jobs in rural areas, one of the largest, (if not the largest) private sector employer in rural Powys is a sawmill which is reliant on the forests to provide the timber. There has been substantial investment by these wood processing companies in recent years, at least £48m in the last 8 years, but they could do much more, recent surveys suggest that they could treble their capacity if the resource was there to support it.

Timber sales and jobs can be valued and calculated but it is difficult to quantify and put a value on many of the other benefits forestry provides which makes public funding of the actions that are creating the benefits both difficult and unlikely. The forestry sector is a profit making sector, the commercial activity of growing timber generates income for landowners helping to pay for many of the benefits society enjoys. This also helps to reduce the demands on the public purse with less funds needed to be spent on health because of cleaner air and less spent on flooding prevention projects downstream.

The stated objective to reducing the demand for virgin materials, whilst laudable for non-renewable resources, is in fact the worst possible objective for the forestry sector. All the benefits forestry provides to society like cleaning the air and water, mitigating against flooding, habitats for biodiversity and places for recreation are provided, mostly at no cost to the public purse, by the commercial activity of producing timber. Any aspiration to reduce demand for forest products will reduce the commercial activity which is the only activity that is providing funding to manage woodlands. This will lead to at least a stagnation of woodland creation and quite possibly a reduction in the forest area with a corresponding reduction in the benefits the forests provide.

Improving community and individual wellbeing by taking a place and landscape based approach. It is difficult to respond to this theme as we feel it is not clear what this refers to.

In the context of woodlands and forests there is plenty of evidence of the wellbeing provided by forests for all, the WG's woodlands for Wales strategy spells out clearly the part woodlands play. One of the desired outcomes of the WFW strategy is that more people live healthier lives as a result of their use and enjoyment of woodlands, annex 1 and 2 show some of the benefits. The 2015 WFW indicators shows an increasing percentage (80.8% up from 72% in 2009) of the population has access to 20ha+ within 4km of their home.

Improving community and individual wellbeing are enhanced by access to green spaces and leisure facilities, these facilities are often provided at no cost to the public purse by the forestry sector. Expanding the forest area in Wales can only mean that more people get access to the facilities they provide and must therefore improve wellbeing for everyone.

The place based approach is dependent on the scale at which it is judged. Forestry operates at different scales depending on where it is and what is its function. As commented above urban forests provide many benefits at a local level but these are different to the larger rural forests. It is wrong to judge either on the merits of the other, both are important but both need to operate at the scale which is appropriate. The larger rural forests need to operate at a grand scale to achieve economies of scale, their benefits are also felt at scale and they need to be assessed in their capacity to contribute to the wellbeing of the whole of Wales. A small urban woodland could never hope to achieve Wales wide benefits and they should not need to. The point is we need both large and small scale with some operating locally and some at a Wales wide level.

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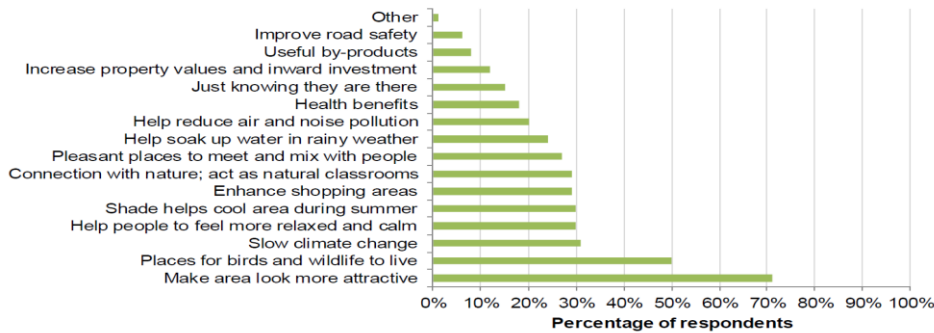




Annex 1

b) Perceptions of the benefits and disadvantages of urban trees:

Chart 11: Benefits of urban trees

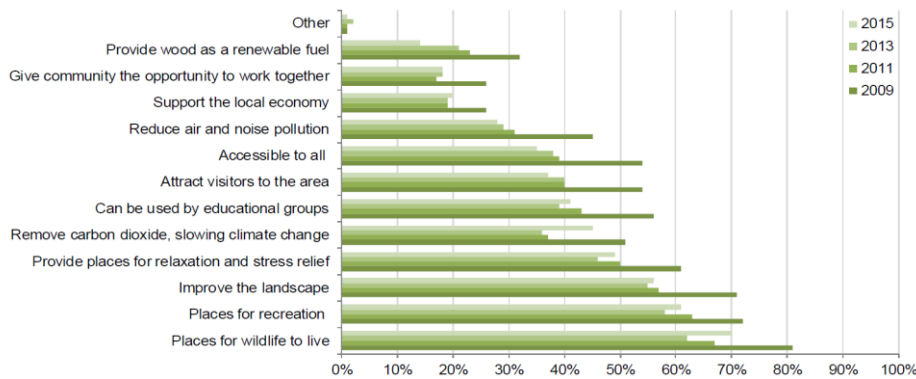


Source: Public Opinion of Forestry Survey

Annex

Chart 15: Benefits of woodlands to local communities

2.



Source: Public Opinion of Forestry Surveys

<u>The key steps that need to be taken in order to deliver on the priority themes and address the key challenges:</u>	<u>The barriers that need to be addressed.</u>
Recognise that timber is a renewable resource and prevent WG policy from discriminating against it.	The NNRP needs to support forestry creation and accept the compromises necessary to allow the regulators to make it happen.
Increase woodland creation in Wales and support long term woodland management in order to provide a renewable resource for both the existing markets for wood and the projected increase in biomass use.	Accept the premise that we will have land use change in Wales. Over regulation and inadequate regulation. Uncertainty over public support schemes. Woodland creation mapping criteria
Address the shortfall identified in the timber availability forecast and build on the findings of the Confor / WFBP report arising from the Oct '14 workshop Welsh Softwood Timber Supplies and Our Green Economy conclusions and	EIA legislation and process. Acceptance that we need a conifer resource in Wales as well as a broadleaved resource. Communicate the message about where timber products come from to WG, regulator and the public to gain

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recommendations key recommendations	acceptance of the type of woodlands Wales needs.
Use the knowledge that forestry provides many additional benefits to society as a reason to increase the woodland area of Wales without waiting for proof or trying to value these benefits and services.	The concept of Payments for Ecosystem Services or Natural Capital are laudable but the process and system for making these judgments is still a long way off and may never be fully understood, which will only serve to delay the decision making process. We should accept that forestry provides many benefits to society and use that information to enable an increase in the woodland area in Wales. A perfect decision is desirable but unachievable. No decision is achievable but undesirable. A less perfect decision is achievable and desirable.
Continued support for forestry research in areas like new technology, plant health ecosystems services provided by forestry	Loss of EU funding post Brexit. Reduced profitability for private companies driven by a reduction in resource availability will in turn reduce their ability to fund research.
Use legislation to stimulate the use of timber products as replacements for non-timber materials e.g. concrete, plastics, steel. "Timber first" for public procurement	Building regulations Conservatism of architects and planning/building inspectorate Public awareness. Governmental reluctance to favour one sector over another.

The key steps that need to be taken in order to deliver on the priority themes and address the key challenges in the context of woodland creation are improve the decision making capability of the regulator by identifying large areas in Wales where there is a presumption in favour of woodland creation..

Nothing in this policy is geared towards improving the clarity needed to make the, often difficult, choices that will have to be made if we are to progress this policy. Everyone involved needs to know the priorities of WG, do we want land use change or not? Without clear priorities set by WG in advance there is no incentive for anyone to change what they desire and land use change will simply not happen. Without clear guidance on the desired outcomes how can the regulator actually regulate, all they can do is opt to retain the status quo.

The barriers that need to be addressed are to encourage or persuade the organisations in Wales that seek to perpetuate the status quo to actually engage with land managers and decide on the best use of land in Wales. Cooperation is the desire of two or more parties to come together and mutually gain something out of the process, if one party already gets all they desire then there is no incentive to cooperate.

In the case of woodland creation we need to know where forests can be created and there needs to be a presumption in favour of tree planting in these areas, and we need to be very clear and firm on that. This would drive everyone to the cooperation table.