

25 Year Environment Plan Inquiry

Confor: promoting forestry and wood (www.confor.org.uk) is a not-for-profit membership organisation for sustainable forestry and wood-using businesses. Confor represents the whole forestry and wood supply chain and focuses on strategic issues vital to the success and sustainable future of the sector.

We are only responding to questions relevant to productive forestry and timber, and our vision of a Common Countryside Policy.

Ambition and reporting

1. To what extent does the Plan set a sufficiently ambitious agenda across Government?

There are some excellent ambitions for forestry, including: increasing supplies and use of home-grown timber, increasing large-scale woodland creation through Forestry Investment Zones, acknowledging the carbon-storage potential of timber in construction, promoting a Northern Forest, stimulating the manufacture of new products like cross-laminated timber, a forest carbon guarantee scheme, better management of broadleaf forests for timber, designing a new woodland grant scheme that encourages integration between farming and forestry, appointing a Tree Champion, drawing on the Mackinnon review of forestry in Scotland, publish a tree health resilience plan in 2018, and support zero-deforestation supply chains globally.

The plan also links in well to Clean Growth Strategy and Industrial Strategy which is particularly important for forestry which supplies an industrial material as well as being a rural land use.

2. How far do the objectives, targets and indicators set out in the plan reflect a higher level of ambition than existing targets (including European Union targets and the Sustainable Development Goals) and current performance?

There are several instances of higher level of ambition than existing targets:

- The ambition to develop supply of and markets for hardwood timber
- The ambitions on plant health
- The Forest Carbon Guarantee scheme

Planting 180,000 hectares by the end of 2042 represents 7,500 hectares per year is in line with woodland creation targets called for by Confor and the Woodland Trust. It is an existing 'aspiration' but the wording of the Environment Plan suggests a stronger ambition, accompanied by actions, to meet it.

3. Are there any major gaps?

There is no specific ambition on woodland management although it is mentioned in the text. This could be achieved through a scheme of small business investment and support.

4. What would success or failure look like for the Plan?

Success would be an increase in the supply of sustainably-grown UK timber.

Failure would be an increasing reliance on imported timber, especially from unsustainable sources, or on less environmentally friendly materials such as concrete and plastic.

5. To what extent will the Government's proposals for reporting on the Plan allow for proper scrutiny of its performance against its objectives?

Yes they will.

There is considerable scope for improvement in Forestry Statistics. For example, the current measure of woodland creation 'conifer' and 'broadleaf' provides no indication of the amount of timber being grown or the diversity of the forests: for example, many new 'conifer' areas include large areas of open space and broadleaf woodland.

6. Are the commitments to legislative action in the Plan sufficient to ensure it will endure beyond the current Parliament?

No answer.

Implementation

7. The Plan sets out a natural capital-led approach and a principle of "environmental net gain" when undertaking development. What are the risks and benefits of adopting these approaches?

The benefit of a natural capital approach is that it can encourage consideration of the wider implications of actions, for example by asking a business which relies on a water supply to consider the cost of finding water from an alternative source if, for example, the water supply failed due to deforestation of the catchment.

The risk is that natural capital can be a subjective approach:

Natural capital may be used cynically to justify what someone wants to do anyway ('greenwash').

Or, it may be used in good faith but with too much confidence. As a rapidly developing tool, the results of natural capital must always be treated as contingent, and adjusted immediately when new evidence or insights come to light.

For example, calculations of the natural capital value of forests have usually focused on the forest itself: the carbon in the trees, the biodiversity value, etc, while the timber is considered to be adequately valued by its market price. However, this fails to take into account the natural capital value of the timber itself, for example in locking up carbon in timber buildings, substituting high-carbon materials like concrete, or major pollutants such as plastic; or by providing a supply of sustainably-grown timber to reduce deforestation supply chains and pressure on intact and precious natural forests overseas. When these aspects are taken into account, the value of the timber to society is far higher than the price it fetches on the market.

8. What steps need to be taken during development and implementation to ensure they lead to positive environmental outcomes, especially in respect of biodiversity?

Woodland creation and management is widely considered one of the best ways to increase biodiversity.

9. To what extent does the Plan set out effective delivery mechanisms to ensure DEFRA, other Government departments and public bodies have the resources and responsibilities to implement it?

The process of woodland creation application needs to be properly resourced to be slick and useable, with simplified regulations and grant applications.

The forestry and timber sector must be involved in designing the relevant metrics.

10. Where should the Government seek agreement with the Devolved Institutions to ensure a common approach across the UK?
 - Research
 - Statistics
 - Plant health
 - There should be consistency in woodland creation schemes across the UK, or the majority of the investment will go to the region which offers the highest grants and simplest application process.

Principles and Oversight

11. The Government has proposed an independent statutory body to “champion and uphold environmental standards as we leave the European Union”. What role, legal basis and powers will it need to ensure the Government fulfils its environmental obligations and responsibilities?

N/a

12. How do these compare to the role of the European Institutions in the existing arrangements?

N/a

13. What standard would it have to meet to be “world leading”?

N/a

14. The Plan sets out a series of objectives and the Government says it will consult on a policy statement on environmental principles to underpin policy-making after leaving the European Union. What principles should the Government include as part of that consultation? What legislation might be needed?

The government should be assessing the impact of any UK policies on the global environment through the impact on markets, resources etc.

For example, at present the UK is the second biggest importer of timber in the world; and an assessment should be made on the impact this has on the global environment, and how that impact would change if more sustainable timber was grown in the UK.