

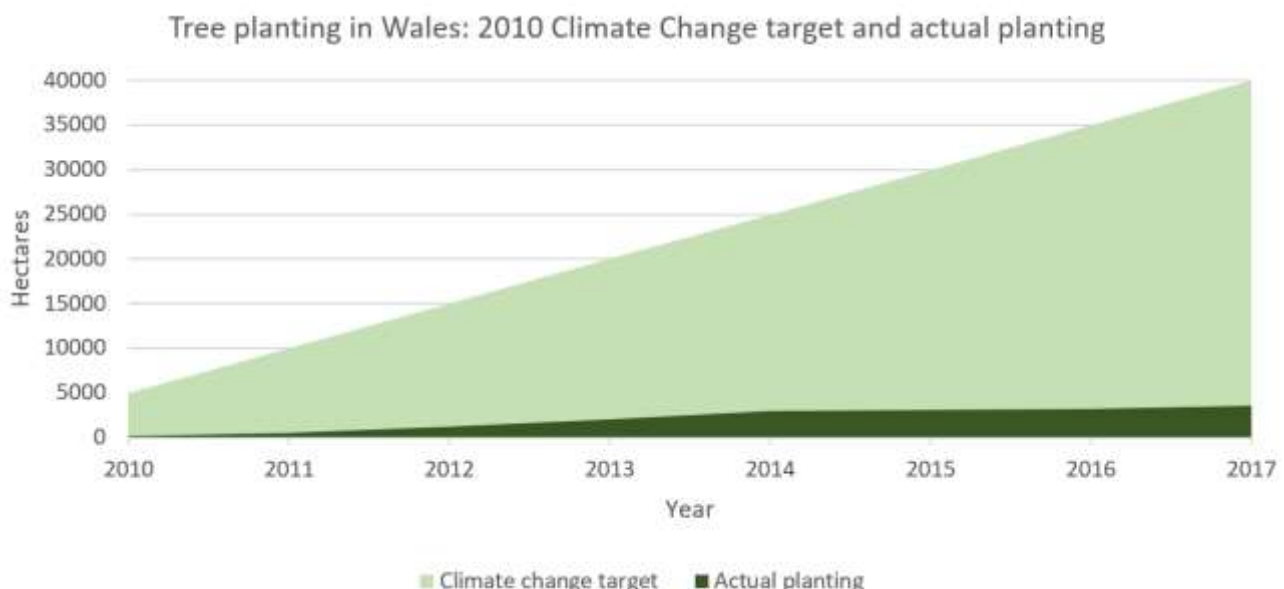
Confor Response to Welsh Government *Achieving our low-carbon pathway to 2030* consultation

Please tell us if you have any ideas for how we should deliver the potential actions for reducing emissions.

'Revise our regulatory and support regimes to increase tree planting to at least 2,000 hectares per year, aiming to increase this to 4,000 hectares'.

To help deliver the following actions, we recommend the following:

- Urgency and ambition:** The Welsh Government CCERA Committee highlighted Confor's evidence in its *Branching Out* report¹ that Wales was 31,800ha behind on woodland it should have created for climate mitigation, according to the 5,000ha/year target set out in its 2010 *Climate Change Strategy*.² Two planting seasons later, Wales is a massive 39,600ha behind that 40,000ha target, and even a target of 2,000ha/year seems ambitious. Tackling climate change is urgent. Every tree in the ground will begin sequestering carbon immediately, but trees that remain paper targets in the future achieve nothing. We would expect to see Welsh Government making every effort and devoting substantial resource to meet and exceed its original 5,000ha/year woodland creation commitments. Funding for tree planting, favouring productive forestry, must be made available immediately, and the



barriers to planting addressed within a year.

¹ <http://senedd.assembly.wales/documents/s500003799/Report.pdf>

² <https://gov.wales/topics/environmentcountryside/climatechange/emissions/climate-change-strategy-for-wales/?lang=en>

- **Favour forests that produce high-value timber.** The consultation document notes that using timber in construction is an opportunity to lock away carbon and to displace carbon-intensive materials. Confor's study *Carbon benefit from Eskdalemuir* found that adding the carbon benefit from these factors more than trebled the benefit that would derive from the standing forest alone.³ As of 2017, the Committee on Climate Change include harvested wood products in their calculations.⁴ The majority of new woodland creation should therefore be mixed productive forestry under the UK Forestry Standard (UKFS) – 75% fast-growing high-value softwood, and 25% diverse species, native broadleaves and open areas ensuring the forest delivers a wide range of biodiversity, amenity and landscape benefits. This will maximise the speed and duration of carbon sequestration from the forest, and will ensure the forest generates its own income in future to pay for its maintenance and preservation.
- **Capital grants for planting:** Farmers are eager to invest in forestry, to diversify their income. Our members report that, even without publicity, there are proposals for two or three times the current level of planting. However, farmers do not have access to capital to pay for the costs of planting, and require compensation for lost income they could have expected to receive in farming support, which equates to around £3,600/hectare.⁵ A £18m investment for 5,000 hectares of forestry should deliver around 36,500 tCO₂e every year over the long term.
- **A high-level individual tasked with improving approvals process:** Natural Resources Wales (NRW) must be held responsible by Welsh Government for enabling woodland creation targets, and given additional staff resources as necessary. It appears that staff in NRW have too little direction from above and too much leeway to set their own priorities, for example, 'gold-plating' forestry practices at the expense of delivering woodland creation under UKFS which has been agreed by multiple stakeholders and is now in its fourth edition. Wales could benefit from appointing an individual to investigate and resolve the causes of delay in woodland creation applications, as was done in Scotland by Jim Mackinnon.
- **Test other land-use support for carbon costs:** for example, if support for lower-carbon livestock farming creates an economic disincentive for landowners to plant part of their land with trees, the carbon lost through lack of tree planting may be substantially greater than the marginal gains from changes in livestock or grassland management.

³ <http://www.confor.org.uk/news/latest-news/eskdalemuir-carbon-report/>

⁴ <https://gov.wales/docs/desh/publications/101006ccstratfinalen.pdf> p.69

⁵ At present, farmers also receive annual payments to compensate for lost farm income and farm support for 12 years, after which the forest is self-supporting.

- **Collaborate with the private sector:** Supporting planting on private land, where the owner/investor bears the cost of the land, is far more cost-effective than buying land and planting it on the NRW estate. In terms of funding woodlands for carbon, there are important opportunities for landowners to buy carbon units under the Woodland Carbon Code, to bridge funding gaps in woodland creation. Welsh Government should publicise and facilitate these opportunities.

'Identify preferred areas for tree-planting, including commercial woodlands and planting at medium and large scale'

To deliver this action Confor recommends:

- **Urgency:** This action should be delivered within a year, to enable proposals for forests in the area to be planned in late 2019 for planting in 2020. Welsh Government must not wait until post-Brexit structures are in place to fund tree planting. In addition to the urgency of tackling climate change, an opportunity to get ahead with diversification into forestry will help many farmers facing significant uncertainty over future agricultural support and markets for farm produce.
- **Focus:** A high-level individual should be tasked with delivering this outcome, should be given appropriate resource and tasked with working with relevant stakeholders.
- **Farmers first:** Many Welsh farmers are eager to diversify into timber, and much Welsh farmland (bracken land and grade 3 and 4 grassland) would benefit from a proportion of forest cover which can also deliver shelter for livestock, flood mitigation, enhancement of walking routes and other benefits.
- **Investment forestry:** A substantial amount of private investment would be available for forestry if land were available and permission to plant could be guaranteed. The project should consider where outside investment could beneficially revive rural economies by creating working woodlands.
- **Publicly-owned land:** At the consultation event Confor attended, representatives of local authorities noted that LA's own considerable amounts of land which at present are not well-used: these might be valuable target areas for forestry to deliver long-term income streams for public benefit. The delivery of the performance targets on the NRW Forest Estate announced in the management plan in July this year should be kept under review to ensure they are delivering as well as possible for carbon sequestration.

'Deliver buildings that [...] increase the use of sustainable materials, such as timber'

The most important prerequisite to deliver this policy is to prioritise productive woodland creation. Additional actions which would help to deliver it include:

- **Ensure architects do not over-specify:** Just as regulators are prone to 'gold plate' woodland creation specifications to the point where no woodland is planted, so architects are prone to over-specify until no Welsh timber can be used in construction. Often C24 (European) timber is specified when C16 (Welsh-grown) would be adequate. Engineered timbers such as Glulam and CLT were designed to turn lower-grade timber into high-quality building materials but in practice higher-grade is often specified in their manufacture. Welsh Government should give guidance to architects on timber procurement, and instruction in its own procurement.
- **Improve forecasts of Welsh timber availability:** Forestry Commission UK produce forecasts of timber availability but these are limited in scope and reliability. Timber is often misleadingly regarded as an abundant resource: in fact it is scarce, and likely to become more scarce as demand rises faster than supply; this is why it is economically valuable. Before developing plans for using timber, particularly Welsh timber, for example in CLT buildings, it will be important for Welsh Government to audit availability of both home-grown timber and imported supply. This will provide focus both for how timber can be best used (for example, 100 highly energy efficient homes might provide more carbon benefit than one CLT skyscraper); and will also focus minds on how much new woodland creation is required to supply our timber needs in future.

What other ideas do you have for reducing emissions between now and 2030?

Smart use of wood energy

p.45 of the consultation document notes that one in five Welsh homes is not on the gas grid. Replacing oil or LPG heating of these homes with low-carbon alternatives would be a significant reduction in Welsh carbon emissions.

Wood can be a low-carbon fuel with significant local benefits, if it is used carefully. Producing firewood locally can bring undervalued native woodlands into management, creating jobs, providing income for the landowner, and improving the carbon sequestration and biodiversity value of the woodland.

There are, however, potential problems with poorly-designed wood fuel incentives:

- An inflated price of firewood can cause the burning of wood which could have locked up carbon for the longer term in products such as particleboard.
- An inflated price of firewood can result in significant quantities of imported firewood, which poses a significant biosecurity threat: particularly if the bark is not removed, this wood can harbour invasive pests which have the potential to devastate Welsh woodlands.
- An inflated price of firewood can result in 'cowboy' traders damaging woodlands or selling poor-quality (eg damp) firewood which results in air quality issues.

Given our understanding of these issues, it should be possible to develop smarter wood fuel incentives to deliver the decarbonisation of rural heating at the same time as delivering the woodland management and local economic benefits of a local firewood industry.

We recommend that Welsh Government work with the sector to develop a smart wood fuel scheme, for example in collaboration with the wood fuel certification organisation Woodsure.

Considering the opportunities and challenges in each sector, what are your views on whether action should be prioritised in some sectors over others?

Creating mixed productive woodlands with a view to using home-grown timber in construction should be the top priority for Welsh Government in meeting its climate targets.

No other measure can reduce carbon emissions so quickly and cost-effectively while simultaneously delivering the range of economic, environmental and social benefits that woodlands provide.

How could we encourage more collaboration and innovation between sectors?

We would recommend that policymakers considering the use of timber in construction and rural housing and heating develop a close and ongoing collaboration, to join up the supply chain between these sectors. Relevant ministers should work with the forestry minister to lend their weight to ensuring that tree planting targets are met and exceeded as a matter of priority, with forestry regarded as an economic sector as much as an environmental one.

The farming sector should regard forestry as an important opportunity to develop economically resilient and carbon-negative farm businesses, and be given better support and advice to integrate forestry into their businesses.

How do you think the potential actions to reduce emissions might affect you or the organisation you work for?

Forestry is unique in producing a product made from stored atmospheric carbon. Mixed productive woodlands will result in new rural jobs and growth in this vital production and manufacturing sector. This will benefit Confor, as our membership is drawn from the sector. In forestry and timber production, the correlation between carbon benefit and economic benefit is a positive one: a win-win for the Welsh environment and economy.

How do you think the potential actions to reduce emissions might affect the following?

Public health

Trees reduce air pollution, and the species of conifer planted for timber are the most effective trees at absorbing pollutants. Increasing woodland creation will therefore have the co-benefit of tackling one of the biggest public health issues of our time. *Valuation of Welsh Forest Resources* (2017) calculated that the annual value of air filtration by trees in Wales was £3bn.⁶

The opportunity to live near or visit forests is known to have significant benefits for physical and mental health, reducing respiratory and waterborne diseases, reducing blood pressure and stress, increasing mental wellbeing, encouraging exercise, and, as our summers become hotter, providing natural shade for protection from UV rays and dehydration when exercising in summer.⁷

New multi-purpose woodlands of significant scale could be of great benefit to public health, in return for very small investment.

For example, an owner of land in urban greenbelt could be fully funded to plant a substantial 2km² forest for £700,000 which will consistently sequester 146 tonnes CO₂ every year⁸ and yield income for its own future management. This is a tiny investment compared with the cost to Wales of mental illness (around

⁶ <https://www.forestresearch.gov.uk/research/valuation-of-welsh-forest-resources/>

⁷ [https://www.forestry.gov.uk/PDF/FCRP027.pdf/\\$FILE/FCRP027.pdf](https://www.forestry.gov.uk/PDF/FCRP027.pdf/$FILE/FCRP027.pdf) p.42

⁸ <http://www.confor.org.uk/news/latest-news/eskdalemuir-carbon-report/>

£3bn)⁹, obesity (£73m)¹⁰ and air pollution (estimated to cause 2.000 deaths a year)¹¹

Communities

Confor's report *Upland Forestry in Wales*¹² found that forestry supports approximately the same number of employees as farming currently does, but without the need for ongoing public subsidy. Forestry planting is generally concentrated on poorer agricultural land which struggles to maintain employees and income levels.

This does not take into account the employment provided by the wood processing sector and the jobs they support in rural areas of Wales.

It also does not include the opportunities for SME's and economic development associated with forestry. Confor's study in south Scotland, *Forestry and Local Economy* found that new woodlands created local economic revivals: ruined farm cottages refurbished as owner-occupied or holiday accommodation, open land used for businesses such as falcon breeding or machine contracting, and new recreational paths.¹³

The Welsh language

Most forestry and timber businesses are family firms, with local roots deep in the Welsh countryside. They have an important role in sustaining Welsh culture and language, and the heart of their economic activity is those areas where community and culture are most at threat.

Equality

Forestry and timber is perhaps one of the most rapidly-changing of traditionally male-dominated sectors in the UK. The family business structure of many firms means that in many cases it is daughters who are moving into executive roles. There are as many female as male faces amongst forestry graduation photographs from Bangor university.

The integrated structure of the supply chain, the diverse range of jobs and skills and the strongly meritocratic culture of the sector have created strong opportunities in forestry and timber for employment and career development for people of all social backgrounds.

Children's rights

No answer.

⁹ <https://www.fph.org.uk/policy-campaigns/special-interest-groups/special-interest-groups-list/public-mental-health-special-interest-group/better-mental-health-for-all/the-economic-case/the-costs-of-poor-mental-health/>

¹⁰ <http://www.wales.nhs.uk/news/33731>

¹¹ <https://www.bbc.co.uk/news/uk-wales-39182628>

¹² <http://www.confor.org.uk/media/79583/upland-forestry-in-wales-report.pdf>

¹³ <http://www.confor.org.uk/media/246920/westwater-larriston-forestry-and-local-economy-feb-2018.pdf>

How do you think the potential actions to reduce emissions might contribute to achieving the national well-being goals?

A prosperous Wales: the global value of timber, and the range of valuable applications for it, are growing rapidly. Wales has the potential to become a significant producer of this 'green gold'.

A globally responsible Wales: in addition to making substantial contributions to our global carbon targets, reducing our imports of timber by planting more of our own will relieve irreplaceable natural forests overseas, which are increasingly under pressure from timber exploitation.

A Wales of vibrant culture and thriving Welsh language: Forestry and timber processing provides economic independence and secure jobs for Wales' most rural locations. Multi-purpose forests can also protect historic sites and enhance their settings with new planting and visitor access, enhance landscapes, and create visitor hubs such as the Llandegla Mountain Biking Centre.

A Wales of cohesive communities: As above

A more equal Wales: See answer on Equality above

A healthier Wales: See answer on Public Health above

A resilient Wales: In addition to contributing to economic and climate resilience, forestry makes a very important contribution to Wales' ecosystem resilience. Forests are the natural ecosystem of Wales, and a modern, multi-purpose forest is designed to redevelop this ecosystem as quickly as possible, while simultaneously creating economic value. This is done through the "mosaic habitat" structure of the forest, with a varied age profile of trees and a mixture of open land and diverse and native tree species. It is also done by the retention of a proportion of deadwood after each harvest: deadwood is recognised as one of the most important of UK habitats, supporting an estimated 13% of all UK species.¹⁴ Modern forests are also designed to mitigate flooding and other impacts of climate change.

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¹⁴ https://www.buglife.org.uk/sites/default/files/Deadwood_0.pdf