

## Response to *Brexit and our Land*

Confor: Promoting forestry and wood ([www.confor.org.uk](http://www.confor.org.uk)) is a not-for-profit membership organisation which represents 1500 sustainable forestry and wood-using businesses across the UK. Confor represents the whole forestry and wood supply chain and focuses on strategic issues vital to the success and sustainable future of the sector.

This response was developed following wide-ranging discussion with Confor members.

Confor is happy for this response to be published.

### Contents

1. Summary
2. Answers to consultation questions
3. The need for urgency and ambition in forestry policy
4. Transition arrangements from 2019
5. A longer-term land use scheme

### Summary

- The Welsh Woodland Creation strategy requires urgency and ambition across Welsh Government.
- Planting must favour forests producing high-value timber under the UK Forestry Standard, which deliver the greatest range of benefits.

#### **The transition period** (more details on p.15)

- We warmly welcome the hints about a step-change in funding for forestry as early as next year.
  - Some funding should be announced now, recognising the time involved in preparing forestry plans.
  - The 'windows' system should be replaced with a first-come-first-served system of applications.
- NRW must be provided with sufficient staff resources to handle increased applications. This should include:
  - a dedicated unit to handle large woodland creation applications;
  - a lead individual tasked with improving the woodland creation process.

#### **A longer-term land use scheme** (more details on p.16)

- We would welcome a carbon funding scheme under the public goods package. Funding to bring unmanaged woodland into management is also important.
- Capital grants should also be available for planting timber crops under the economic resilience package.
- A target of at least 4000 hectares (ha) /year, as per the Committee on Climate Change recommendations, must be maintained and ideally

restored to the 2010 target of 5000ha. The estimated area of conifer woodland in Wales has decreased by 18,000ha since 2001.<sup>1</sup> At least 60,000ha new planting is required merely to sustain wood supply at current levels and prevent job-losses in the processing sector (p.13); an additional 11,000ha would be required to supply a Welsh CLT plant (p.14) exclusive of any future growth in the use of Welsh timber in existing sectors, such as timber frame housing, fencing, pallets, packaging, paper, biomass, or exports to England;

- We welcome the proposal for a scheme of outcome-based payments for public goods in which 'there is no reason why a farmer or forester cannot produce public goods and food and timber.'
- We welcome the proposal for multi-year agreements to deliver meaningful public goods over years or decades.
- The scheme should commit to a principle of a level playing field for different land uses in eligibility for all relevant funding.
- We would welcome the opportunity as a sector to take part in public goods scheme trials.

## Consultation Question Section

### ABOUT YOU

Your name Eleanor Harris

Organisation (if applicable) Confor: promoting forestry and wood

Email [eleanor@confor.org.uk](mailto:eleanor@confor.org.uk)

Address 59 George Street, Edinburgh EH7 6NF

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### GENERAL QUESTIONS

Please indicate whether you are responding as:

- An individual
- On behalf of an organisation X**

Please indicate which of these best represent you or your organisation

[Please tick all that apply]

- Farming
- Forestry X**
- Environmental interests
- Tourism/hospitality
- Food and timber supply chains X**
- Public sector

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<sup>1</sup> P.5 <https://gov.wales/docs/statistics/2016/161220-woodlands-wales-indicators-2015-16-en.pdf>

- g. Private sector X**
- h. Third sector
- i. Trade Union/Representative
- j. Other, please specify below

### **Question 1 of 20**

#### ***From Chapter 4: Land Management Programme***

*We propose a new Land Management Programme consisting of an Economic Resilience scheme and a Public Goods scheme. Do you agree these schemes are the best way to deliver against the principles?*

- 1. Yes but see comments below**
- 2. No
- 3. Unsure

If NO, what alternatives would be best?

In the light of the urgency to tackle climate change, build a low carbon economy, and build homes for the future, the second principle should read: 'food and timber production is vital for our nation and food and timber remain important products from our land. That means continuing to support the economic activities of land managers where it is in the public and national interest to do so.'

### **Question 2 of 20**

#### ***From Chapter 4: Land Management Programme***

*Does the Welsh Government need to take action to ensure tenants can access new schemes?*

Yes, tenants can miss out on opportunities to plant trees because there is no clear mechanism to share the benefits of the investment between the tenant and the landlord. A model contract may help.

### **Question 3 of 20**

#### ***From Chapter 5: Economic Resilience***

*From your experience of current programmes, what do you feel would work well for the future?*

We agree with the response of the Woodland Strategy Advisory Panel, particularly that the following should be supported under this scheme:

- 1. long-term forest management through the production of forest management plans (currently no support)
- 2. woodland management (currently no support)
- 3. grants for woodland creation

4. Farming Connect should be renamed Farming and Forestry Connect and have far greater forestry expertise and focus than now.

There should be a link between the two schemes, with the economic resilience scheme providing capital and investment while the public goods scheme provides revenue streams to secure the benefit flows.

#### **Question 4 of 20**

##### ***From Chapter 5: Economic Resilience***

*Do you agree with the focus of the Economic Resilience scheme being on growing the market opportunities for products from the land throughout the supply chain, rather than restricting support to land management businesses only?*

Yes, access to the scheme should not be restricted to land management. In the forestry sector support should include forest nurseries, agents, contractors, consultants and haulage.

If support is available to the food/agriculture processing sector, this should also be available on a 'level playing field' basis to the timber processing sector; but given limited funds we suggest the focus of this support be on production as there are other income streams for investment in food and timber processing.

#### **Question 5 of 20**

##### ***From Chapter 5: Economic Resilience***

*Are the five proposed areas of support the right ones to improve economic resilience?*

1. **Yes X**
2. No
3. Unsure

*Are there any areas which should be included but currently are not?*

No answer

#### **Question 6 of 20**

##### ***From Chapter 5: Economic Resilience***

*Of the five proposed areas for support, which are the priorities, both in terms of funding, and the sequence of delivery? For example, are certain measures needed in advance of others?*

Area 3: Diversification: Diversification into timber growing has multiple benefits for farmers:

- Bringing land which is uneconomic for livestock or arable crops back into production through a valuable crop;
- Concentrating livestock/arable production on the best land and providing shelter: a study by the National Sheep Association and Woodland Trust reported that lamb losses can be reduced by up to 30% if good shelter is provided,<sup>2</sup> and Confor's *Farm Forestry* report explored how integrated forestry belts can lower winter feed and grassland improvement costs;<sup>3</sup>
- Providing carbon, flooding, biodiversity, air quality and access benefits without compromising the land's economic value.

Land managers require the capital funding and guidance required to diversify successfully into productive forestry.

Area 2: improving productivity: This should provide funding to bring uneconomic woodlands into management, for example through a carefully-designed rural woodfuel scheme. See Confor's response to the *Low Carbon Pathway* consultation for more detail.<sup>4</sup>

Area 4: Effective risk management: This should include adequate support for tree health, and a principle of a level playing field of support for forestry and farming in the case of extreme weather events or disease outbreaks.

Area 5: Knowledge exchange, skills and innovation. Support should be given to recruit new entrants and provide CPD to the growing and fast-developing forestry sector. A model for this might be the Forestry Commission Scotland Modern Apprenticeship Schemes for foresters<sup>5</sup> and machine operators<sup>6</sup>.

## **Question 7 of 20**

### ***From Chapter 5: Economic Resilience***

*Should we be investing in people, for example to bring in new ideas, skills and people into land management and the supply chain in Wales?*

- 1. Yes X**
2. No
3. Unsure

*If YES, how should we look to do this?*

In forestry this should be done in collaboration with the private sector which is already taking a lead in this.

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<sup>2</sup> <https://www.nationalsheep.org.uk/workspace/pdfs/nsa-sheep-and-trees-for-website.pdf>

<sup>3</sup> <http://www.confor.org.uk/media/246612/confor-farm-forestry.pdf>

<sup>4</sup> <http://www.confor.org.uk/media/247156/confor-response-to-low-carbon-pathway-oct-2018.pdf>

<sup>5</sup> <https://scotland.forestry.gov.uk/news-releases/modern-apprentice-opportunity-for-budding-foresters>

<sup>6</sup> <https://scotland.forestry.gov.uk/news-releases/new-apprenticeship-scheme-to-train-forestry-machine-operators>

## **Question 8 of 20**

### ***From Chapter 6: Public Goods***

*We have set out our proposed parameters for the public goods scheme. Are they appropriate?*

- 1. Yes X**
2. No
3. Unsure

*Would you change anything?*

1. Yes
2. No
- 3. Unsure X**

*If YES, what?*

The schemes must ensure that a less economic or more environmentally damaging activity is not given support which gives it a competitive advantage over an alternative activity which would provide greater environmental benefits through its unsupported market activity– for example, disincentivising tree planting on marginal grazing land by supporting sheep farming when there would be a higher income before subsidy and greater environmental benefit from planting trees. This can be achieved by ensuring the same level of support is provided for the same public benefit (eg, a tonne of carbon) whatever the activity, and a consistently enforced regulatory baseline across all land uses.

We support the questions raised in the WSAP response.

## **Question 9 of 20**

### ***From Chapter 6: Public Goods***

*This scheme is meant to offer land managers the opportunity to access a significant new income stream as the BPS comes to an end. How could we improve what is being proposed to attract land managers whilst still achieving our vision and objectives?*

More details of this scheme are needed to answer this question. Payments should not reward land managers who are improving from a low standard at the expense of land managers who are already delivering public goods.

## **Question 10 of 20**

### ***From Chapter 6: Public Goods***

*Are there any other Public Goods which you think should be supported?*

1. Yes
- 2. No X**
3. Unsure

*If YES, why?*

## **Question 11 of 20**

### **From Chapter 6: Public Goods**

*A number of public goods could potentially take several years, sometimes decades, to be fully realised. E.g. carbon sequestration through broad leaf trees. To deliver on these, land managers may need to enter into a long term contract. How do you see such agreements working? What do you see as the benefits or disadvantages to such agreements?*

Why does the question refer to carbon sequestration only through broadleaf trees, when productive conifers sequester carbon much faster (as is necessary given the urgency of the climate crisis) and enable it to be kept stored in timber products while new trees are grown, sequestering carbon faster and also creating jobs and economic growth?

We welcome this recognition which is particularly applicable to woodlands and forestry. Long-term plans are the norm in forestry, often stretching over decades. We would welcome this approach being adopted in Wales as part of a well-supported wider integrated land use policy and a framework for delivering public goods funding.

## **Question 12 of 20**

### **From Chapter 6: Public Goods**

*A collaborative approach to delivering public goods may in some instances provide better value for money than isolated activity. How could the scheme facilitate this approach? How could public and private bodies contribute to such partnerships?*

We support WSAP's response to this question.

## **Question 13 of 20**

### **From Chapter 6: Public Goods**

*Some actions can deliver multiple public goods in the same location. For example, peat bog restoration can have benefits for carbon sequestration and flood risk reduction. However, some locations could be suitable for multiple public goods from different activities. For example, one location may be suitable to either plant trees for carbon sequestration, or to revert to wetland for biodiversity. How could locations for single, multiple or competing benefits be prioritised?*

Where there are several options for multiple public goods and it is not clear which is the more valuable, funding for either should be available to the landowner, who ultimately has the choice of how to manage the land and has detailed knowledge of 'micro-benefits' on the ground to create the best network of production and habitats. For example, planting trees has benefits for biodiversity in addition to providing carbon sequestration, and also provides the opportunity to retain open areas for wetland, in addition to sequestering carbon.

## **Question 14 of 20**

### ***From Chapter 6: Public Goods***

*Given that support for the delivery of public goods will be a new approach in Wales, there will be a requirement for a significant amount of training and advice for the sector. How best could this training and advice be delivered? Which areas of the sector need the most attention?*

At present the training and advice provided for forestry through NRW and Farming Connect is woefully inadequate. This requires substantial overhauling and investment, which should be done in consultation with the experts and practitioners in the private sector and universities.

## **Question 15 of 20**

### ***From Chapter 6: Public Goods***

*Private investment in the purchase of public goods is already happening, but at a relatively small scale. How could the new scheme promote greater involvement from the private sector? What are the barriers to this type of investment?*

In forestry, private sector involvement in delivering public goods is considerably developed, in particular in the UK Forestry Standard, UK Woodland Assurance Standard (the basis of FSC and PEFC certification), and the Woodland Carbon Code. These provide a model of private financing, independent assessment and public endorsement which could be developed across the land-use sector.

## **Question 16 of 20**

### ***From Chapter 8: Transition, delivery and legislation***

*What are your comments on the phased transition period and our ambition to complete the changes by 2025?*

We warmly welcome the hints about a step-change in funding for forestry as early as next year.

Some funding should be announced now, recognising the time involved in preparing forestry plans.

The 'windows' system should be replaced with a first-come-first-served system of applications.

NRW must be provided with sufficient staff resources to handle increased applications. This should include:

- a. a dedicated unit to handle large woodland creation applications;
- b. a lead individual tasked with improving the woodland creation process.

More detail on the transition period is provided below.



### **Question 17 of 20**

#### ***From Chapter 8: Transition, delivery and legislation***

*What is the most appropriate way to phase out the Basic Payment Scheme to start implementation of the new schemes?*

BPS should be phased out on an equal hectareage basis. Any arrangement which, for example, removes support from land managers who rely on it least merely shortens the transition period for those who will have the greatest difficulty adapting.

### **Question 18 of 20**

#### ***From Chapter 8: Transition, delivery and legislation***

*How can we simplify the current administration and delivery of the Basic Payment Scheme during the phased transition period?*

No answer.

### **Question 19 of 20**

#### **Welsh Language standards**

*Will the proposed land management programme have any effects (either positive or adverse) on:*

- *opportunities for persons to use the Welsh language;*
- *treating the Welsh language no less favourably than the English language?*

Forestry and timber is deeply rooted in the Welsh rural economy. Expanding the sector will bring more secure jobs and thriving industries to sustain Welsh-speaking communities.

### **Question 20 of 20**

*Do you wish to make any further comments?*

See below.



## Urgency and ambition in forestry policy

Forestry and timber is a thriving sector, seeing significant investment in the rural economy; substantial increases in the value of wood as part of a global trend; exciting research and development into modern, versatile products and faster-growing, more resilient trees; and a growing recognition of forestry's potential to deliver green jobs, multiple environmental benefits, and a decarbonised economy.

Yet in Wales, all these developments are threatened by the lack of strategic support from government to develop the sector, by ensuring the creation of forests that will produce the timber we need.

### Carbon

We would expect to see Welsh Government putting substantial resource behind tree planting to meet carbon targets as a matter of extreme urgency. The recent IPCC report warns that we must reduce global carbon emissions by 45% within 12 years to limit global warming to 1.5°C, and highlights the crucial role of afforestation as a one of few proven methods of removing carbon dioxide from the atmosphere.<sup>7</sup> This follows a succession of reports from expert organisations highlighting tree planting as one of the most cost-effective tools for large-scale carbon reduction, including the Committee on Climate Change (Figure 1)<sup>8</sup> and Royal Society and Royal Academy of Engineering.<sup>9</sup>

Yet Wales is over 39,000ha behind its 40,000ha climate change planting target, risking a long-term and costly failure to meet carbon targets. This was highlighted by the

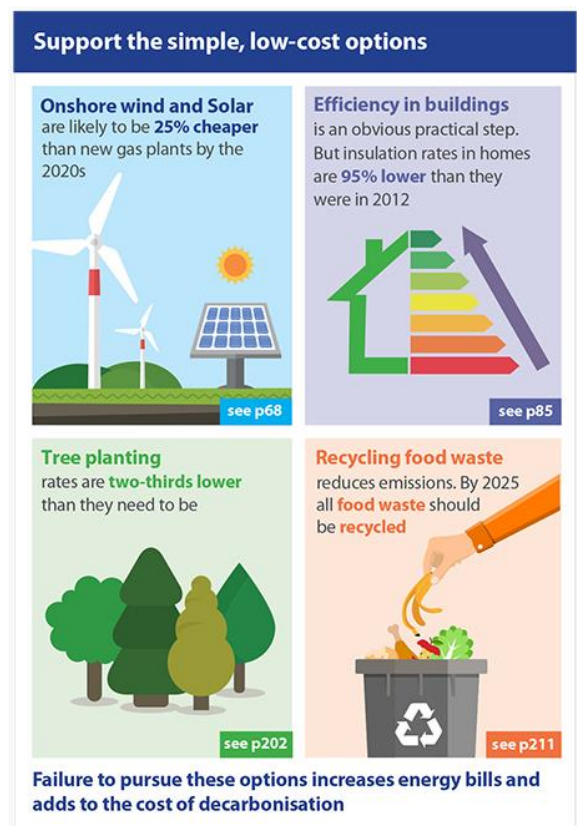


Figure 1. Headline infographic from the Committee on Climate Change *Reducing UK emissions: progress report to parliament* (June 2018)

<sup>7</sup> C1 and C3 [http://report.ipcc.ch/sr15/pdf/sr15\\_spm\\_final.pdf](http://report.ipcc.ch/sr15/pdf/sr15_spm_final.pdf)

<sup>8</sup> <https://www.theccc.org.uk/publication/reducing-uk-emissions-2018-progress-report-to-parliament/>

<sup>9</sup> <https://royalsociety.org/~media/policy/projects/greenhouse-gas-removal/royal-society-greenhouse-gas-removal-executive-summary-2018.pdf>

Welsh Assembly CCERA Committee in its *Branching Out* report with figures up to 2015 (Figure 2).<sup>10</sup>

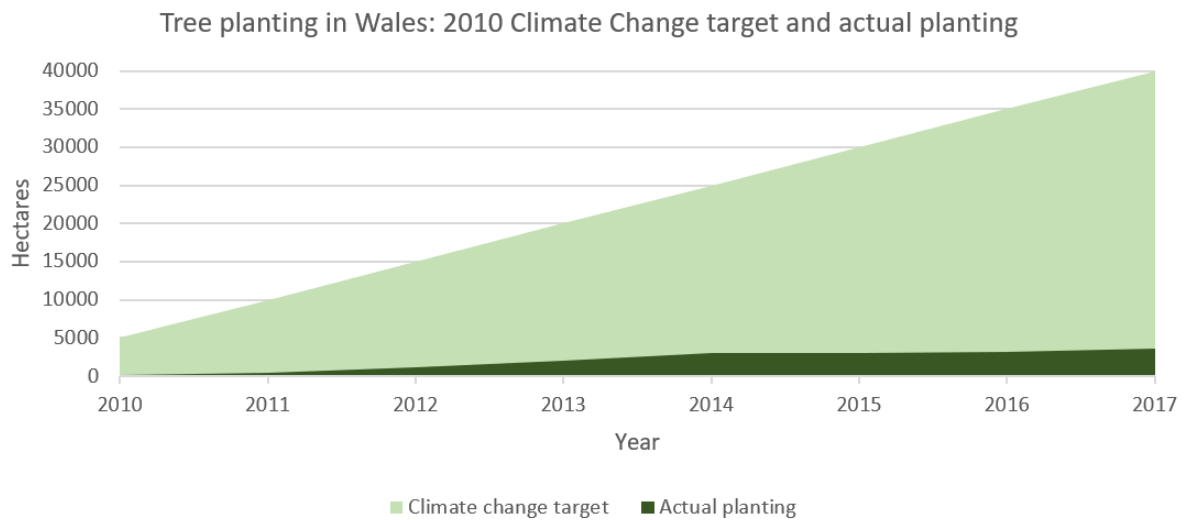


Figure 2. Tree planting in Wales: 2010 climate change target and actual planting. Updated from Confor’s evidence to the CCERA Committee used in *Branching Out: a new ambition for woodland policies* (July 2017)

Confor’s report, *Eskdalemuir: Carbon Benefit from Forestry and Timber* suggests that the true carbon benefit of productive forestry is more than trebled when the impact of carbon stored in wood products, and the substitution of carbon-emitting materials is taken into account (Figure 3).

As the carbon cycle of Harvested Wood Products is better understood, it is likely that forestry will be seen to have a far bigger role in climate change mitigation than is currently recognised. The OECD this month released projections showing global materials use rising to 167 Gigatonnes in 2060 from 90 Gigatonnes today.<sup>11</sup> Many of the mineral materials could be replaced with wood-based alternatives, and the huge carbon emissions associated with their manufacture avoided, but this will require an enormous increase in the amount of productive timber grown.

Wales has an ideal climate and soil for growing timber. To continue to fail to meet our carbon targets and provide sustainable timber for a low-carbon economy would be a serious dereliction of our global responsibilities.

More information on tree-planting and climate change can be found in Confor’s response to the Welsh Government consultation *Achieving our low-carbon pathway to 2030*.<sup>12</sup>

<sup>10</sup> <http://senedd.assembly.wales/documents/s500003799/Report.pdf>

<sup>11</sup> <http://www.oecd.org/newsroom/raw-materials-use-to-double-by-2060-with-severe-environmental-consequences.htm>

<sup>12</sup> <http://www.confor.org.uk/media/247156/confor-response-to-low-carbon-pathway-oct-2018.pdf>

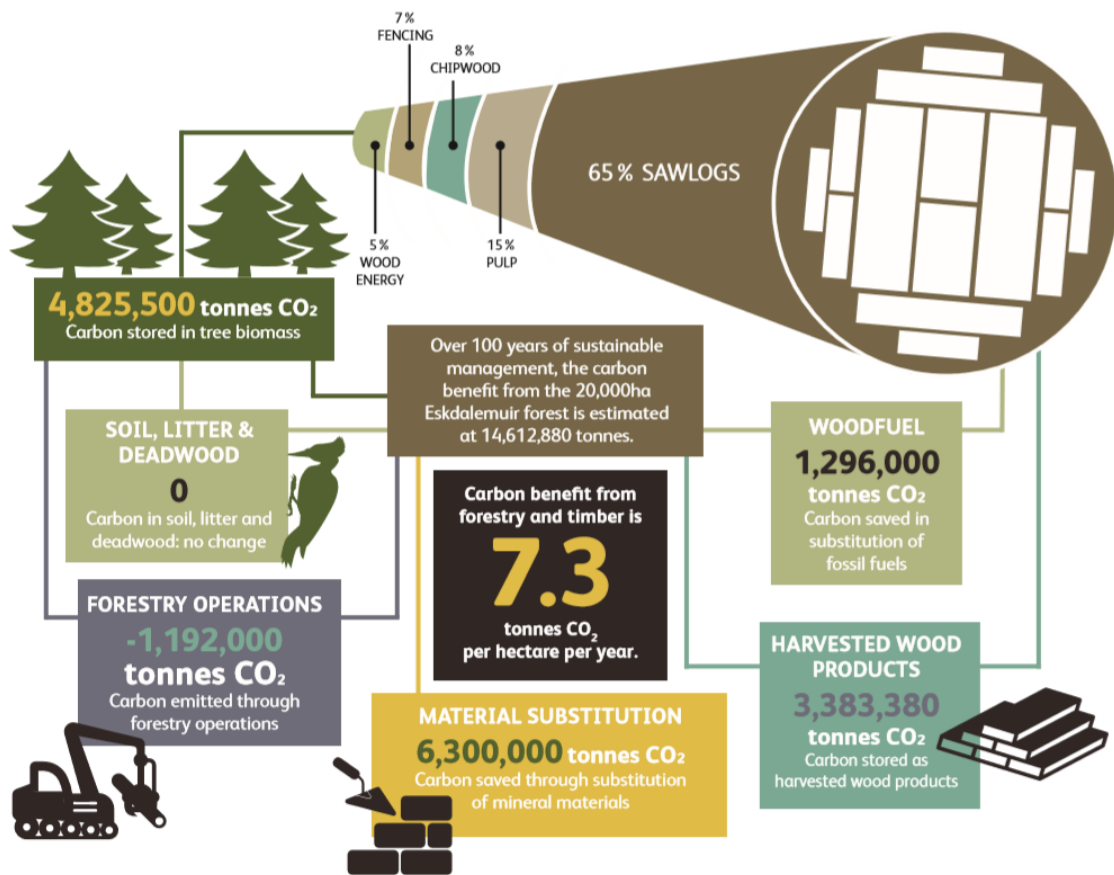


Figure 3. Summary graphic from Confor, *Eskdalemuir: carbon benefit from Forestry and Timber*, 2018.

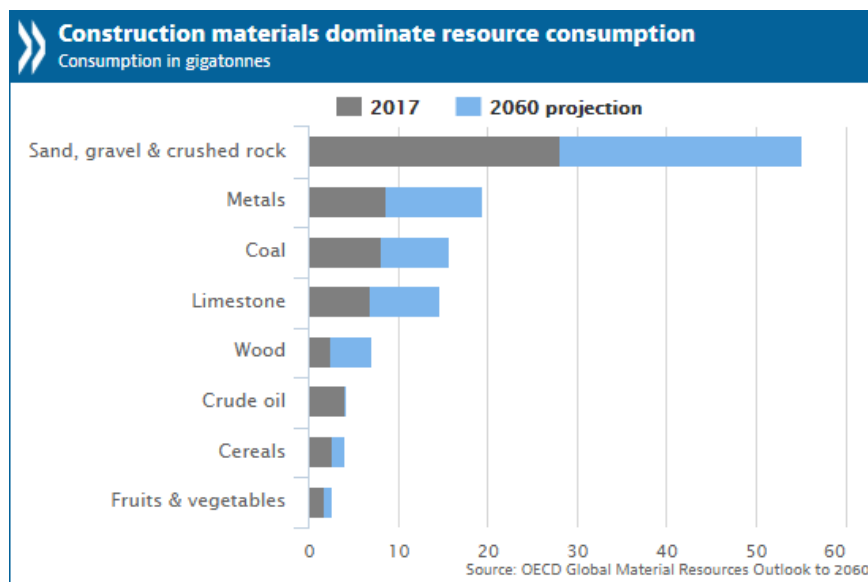


Figure 4. Global resource consumption 2017 and 2060, OECD, *Global Materials Resource Outlook to 2060* (October 2018)



## Supplying the Welsh wood processing sector

The Welsh wood processing sector faces a drastic drop-off in supply which will be catastrophic for rural jobs and communities.

Even large Welsh sawmills are family businesses, deeply rooted in the Welsh countryside often over many generations and sustaining rural jobs, Welsh culture and language. They are investing in new technologies and growing their businesses, but this investment is under threat due to the forecast reduction in wood supply due to decades of failure in productive woodland creation (Figure 5). The estimated area of conifer woodland in Wales has decreased by 18,000ha since 2001.<sup>13</sup> The 50-year timber supply forecast highlights a sharp decline in the supply of Welsh softwood in the medium term (Figure 6).<sup>14</sup> This forecast is likely to over-estimate supply from the NRW estate due to the large-scale conversion of NRW forests to continuous cover management. At least 60,000ha new planting is urgently required merely to sustain supply at current levels.

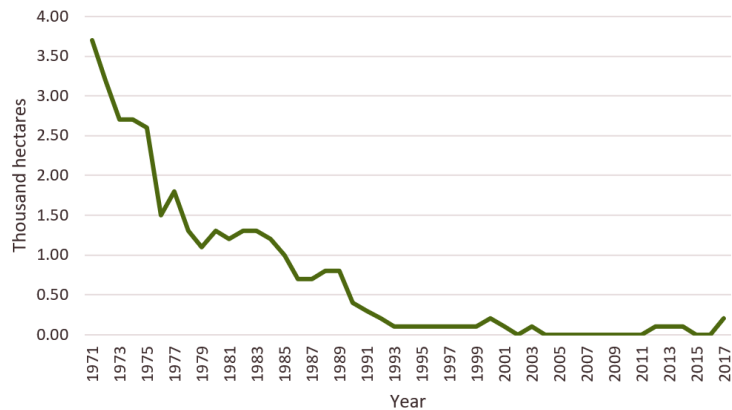


Figure 5. Productive woodland creation in Wales 1971-2017. Source: Forestry Statistics.

## Welsh softwood availability forecast

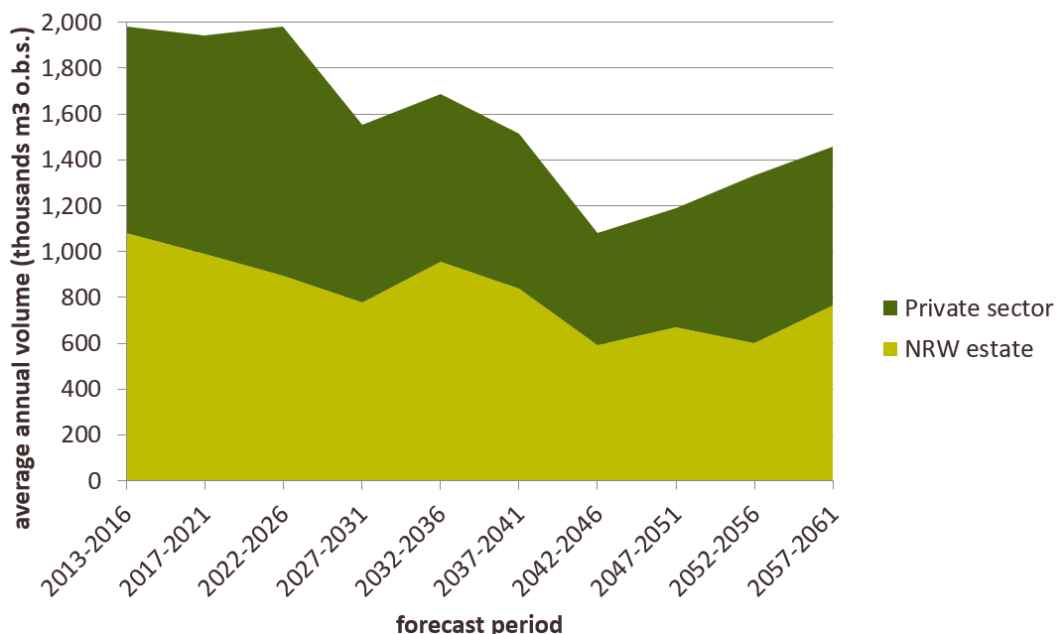


Figure 6. Welsh softwood availability forecast based on National Forest Inventory figures, from Confor, *Welsh softwood timber supplies and our green economy*, 2014.

<sup>13</sup> P.5 <https://gov.wales/docs/statistics/2016/161220-woodlands-wales-indicators-2015-16-en.pdf>

<sup>14</sup> <http://www.confor.org.uk/media/246181/welsh-softwood-timber-supplies-and-our-green-economy-workshop-nov-2014-summary-report.pdf>

## Home-grown homes

This decline in production coincides with a renewed ambition in Welsh Government to use more home-grown timber in the economy.

Since 2017, Welsh Government has been working with Powys County Council and Wood Knowledge Wales to research the viability of making Welsh homes from Welsh wood.<sup>15</sup>

Welsh Government has also been working with the Welsh Structural Timber Association during 2018 to consider the establishment of a Cross Laminated Timber processing factory in Wales.<sup>16</sup> Cross-Laminated Timber is suitable for building high-rise timber buildings and locks up large amounts of carbon for the lifetime of the building (Figure 7).



Figure 7. Carbon stored in the Cross-Laminated Timber building Bridport House, Hackney, London which comprises 41 flats. The building used 1,576m<sup>3</sup> CLT which if produced in Wales would require around 7 hectares of forest. Image: Wood for Good.

It has been calculated that a CLT processing facility producing 70,000m<sup>3</sup> CLT would meet current UK demand, but this demand is set to grow. A hectare of forest produces around 225m<sup>3</sup> of the sawn timber required to manufacture CLT. Therefore, to supply this factory without impacting on the already overstretched timber supply sector, a minimum of an additional 331ha/year (almost 11,000 ha on a 35 year rotation) will be required. This is in addition to the 60,000ha planting required to sustain current supply, and exclusive of any future growth in the use of Welsh timber in existing sectors, such as timber frame housing, fencing, pallets, packaging, paper, biomass, or exports to England.

<sup>15</sup> <https://gov.wales/topics/environmentcountryside/farmingandcountryside/cap/wales-rural-network/local-action-groups/local-action-group-projects-directory/powys/home-grown-homes?lang=en>

<sup>16</sup> <http://woodknowledge.wales/uncategorized/manufacturing-clt-in-wales-is-it-viable>

## Policy Solutions

What should an urgent and ambitious policy for forestry and woodlands look like?

**Planting must favour forests that produce high-value timber.** This will deliver on the widest range of Welsh Government targets and outcomes: supporting farm incomes, developing the rural economy, more than trebling the carbon benefit of an unproductive forest, providing locally-grown timber for construction and other uses, as well as, under UKFS, creating a minimum of 1000ha per year of new woodland managed for biodiversity. It is also the most cost-effective option: more productive conifer can be funded from the same amount of grant as native broadleaves.

## Transition arrangements from 2019

**We warmly welcome the hints about a step-change in funding for forestry as early as next year.** To ensure that this funding is well-used we would request:

- **An announcement of funding now**, to accommodate the lead-in times required to prepare forest plans and gain permission to plant. The Environment minister should ask Welsh Government to guarantee funding for forestry within the overall Welsh budget, as core spending to deliver future climate, economic and housing targets, independently of what may be provided from Westminster. Scotland has committed to its £40m forestry grant scheme next year despite having the same issue with Westminster. We note that Michael Gove in presenting the Agriculture Bill in the House of Commons said, 'I can guarantee [...] that [...] the generous—rightly generous—settlement that gives Northern Ireland, Scotland and Wales more than England will be defended.'<sup>17</sup>
- **A switch to a first-come-first-served system of applications.** This will de-risk the applications process as applicants who know their woodland meets the criteria can be confident of success if they apply in time. It will make more efficient use of NRW staff resources and ensure the budget is fully spent. Forestry Commission England has recently abandoned the 'windows' system recognising its inefficiencies. This does not preclude an initial first-come-first-served fund being announced now and top-up funding being added in due course.
- **Sufficient staff resource to handle applications.** Additional staff should be being recruited and trained now to be ready in time for increased applications.
- **A specialist unit to handle large woodland creation schemes.** There has been no large-scale woodland creation in Wales for many years. A

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<sup>17</sup> <https://hansard.parliament.uk/commons/2018-10-10/debates/2827A5E3-DF64-49EE-8CF9-60F44889E5B9/AgricultureBill>

specialist team should be created to handle these, as has been done in England.

- **A lead individual tasked with improving approvals process.** Natural Resources Wales (NRW) must be held responsible by Welsh Government for enabling woodland creation targets and removing blocks to planting for proposals which meet the UK Forestry Standard.

## **A longer-term land use scheme**

**We would welcome a carbon funding scheme under the public goods package**, paying those who have planted trees an annual sum for the carbon they sequester until the trees are mature. This would have the same impact for forestry as renewables feed-in tariffs, encouraging investment by shortening the payback-period.

**Capital grants must also be available for planting timber crops under the economic resilience package.** these are necessary to enable livestock farmers to diversify into forestry. 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 any lost income they could have expected to receive in farming support.

**A target of at least 4000ha/year, as per the Committee on Climate Change recommendations, must be maintained.** We would prefer to see a return to the 5000ha Welsh Government target of 2010 (noting our graph used in the *Branching Out* report, below). At least 60,000ha new planting is required merely to sustain wood supply at current levels and prevent job-losses in the processing sector (p.13); an additional 11,000ha would be required to supply a Welsh CLT plant (p.14) exclusive of any future growth in the use of Welsh timber in existing sectors, such as timber frame housing, fencing, pallets, packaging, paper, biomass, or exports to England.

**Forestry planting must focus on productive timber.** Welsh Government wants to increase the use of timber in construction. Confor's study *Carbon benefit from Eskdalemuir* found that adding the carbon benefit from timber products and material substitution more than trebled the benefit that would derive from the standing forest alone. Under the UK Forestry Standard, 25% of these forests are managed primarily for biodiversity, including broadleaves and open space. Focusing planting on mixed forests with a 50-75% high-value softwood component will deliver the benefits of forestry most efficiently.

**We welcome the proposal to position public goods funding as positive payment for benefits** (carbon, biodiversity, access, sustaining rural communities etc) rather than as 'compensation for lost income from production'. Land managers should be able to see all their land as an asset, rather than the public benefits as a liability.

**Consistency in payments for outcomes over many years** will be key to the success of a public goods scheme, to enable landowners to develop, for



example, a flourishing and profitable habitat or landscape, rather than being continually required to chase grants for novel projects.

**A level playing field in eligibility for all relevant funding** under public goods and economic resilience, for example management of productive forest for public benefit under UKFS, training, research and development etc.

**We would welcome the opportunity as a sector to take part in public goods scheme trials**, and to demonstrate that forestry can deliver across a wide range of goods. If trials are to start in 2019, we will need more details as soon as possible so that participants can be identified and schemes planned. This is likely to be more complicated for forestry than for farming as it will involve collaborations between landowners/investors and forest management companies. Confor members are already involved in long-term plan pilots: these have run into problems as they comply with Farming Connect processes but not NRW felling licence requirements. Collaboration between (or amalgamation of) agencies must be achieved as a priority before a new set of trials and pilots are begun, as the integration of forestry and farming is going to be a key part of any new scheme.

Eleanor Harris  
Confor Policy Researcher  
25 October 2018