

Consultation response (November 2018)

Scotland's Forestry Strategy 2019-2029

Confor welcomes the opportunity on behalf of its membership to respond to the consultation draft of Scotland's Forestry Strategy 2019-2029 (hereafter referred to as SFS).

Confor is a members' organisation, funded by and accountable to businesses in the forest industries. Our aim is to promote the market for wood, forest products and forest services, and to help improve member's competitiveness.

Confor's remit covers all parts of the industry supply chain, from nurseries through to woodland owners, timber growers, contractors, harvesters, hauliers, sawmills and other processors.

General comments

Confor welcomes this draft as a good start to what will be important long-term guidance for our sector. Whilst even a 100-year vision could have been considered, we accept 50 years as realistic, provided there is a strong focus on what must be achieved in the next ten years, and the strategy makes it clear that only in exceptional circumstances should the direction of travel be changed in the following 40 years.

More forests because they are a good thing – the SFS as a whole seeks to justify the creation of more managed forests, and the benefits those forests bring, by reference to other policies/commitments/documents, rather than saying boldly that forestry is a good thing and that expanding the forest resource is a target of Government.

Leadership and delivery of the SFS – we welcome the various assurances of working with industry in delivery and monitoring (section 5.2), but do not feel that these go far enough:

- **Scottish Ministers should appoint an advisory group of stakeholders to advise them with independent advice on progress with delivery of the strategy.**

Against the background of our support for the concept of integrated land use, we nevertheless feel that **elements of the SFS should be strengthened** to reflect

the present importance of forestry in Scotland's rural economy, and the major opportunities it presents to farmers and land managers if expanded. In particular this means increasing the productive capacity of Scotland's forests and woodlands, in terms of timber production from the existing resource and from the expanded woodland cover that the Climate Change targets will deliver. The SFS refers to these targets, but does not completely embrace them as the top priority for the next ten years. Nor does it really identify the urgent need for this – to mitigate against the dip in wood supplies which will otherwise occur in about 20 years' time. There is also an opportunity to increase fibre supplies during that dip by encouraging more short rotation forestry (SRF) including eucalypts – this shorter rotation to harvest could appeal to farmers used to annual harvests, but it requires a change in policy from the present. By establishing SRF now a useful resource will become available in 15 to 20 years to satisfy demand from the increasing markets for biomass, pallets and board manufacture, and therefore taking pressure off stemwood destined for sawmills.

Members have observed that the document does not adequately reflect **the importance of the private / non-state sector**. The section on the NFE on page 13 is admirable, but there is a latent inference that somehow the benefits delivered on the NFE are not replicated elsewhere. Yet -

- Over two-thirds of forests and woodland in Scotland are owned / managed by the private sector and other non-state entities
- The NFE currently produces less than half of the timber annually available from Scottish forests, and is set to reduce that proportion in the next decade
- The forest industry itself, independent from the state, has the Scottish Forest & Timber Technologies Industry Leadership Group (ILG) with a very robust strategy – Roots for Future Growth, about to be refreshed as Roots for Further Growth – which has significant aspirations for the sector.
- Some of the private estates in Scotland have been practising high quality silviculture for centuries, and that it is these stands of well thinned and high value conifers that are so prized for their scenic beauty, wildlife and their high-quality timber.

The importance of **silvicultural thinning** - A large proportion of existing productive and commercial woodland sites in both public and private ownership have potential to be silviculturally thinned and therefore managed in a manner that provides a larger area of multi-purpose forestry. Silvicultural thinning is the essence of sustainable management, affording a degree of flexibility and is a vital element of strategic forest planning. Poor timber market conditions in the past along with low levels of incentive have meant that woodlands have not entered a silvicultural thinning cycle. The strategy going forward should promote silvicultural thinning and the development of forest infrastructure that is required to undertake this activity.

We feel that these aspects should have more prominence.

The commentary under '**Effective and proportionate incentives and regulation**' at section 5.2 needs expanding:

- the £62m budget figure for forestry in 2018-19 is opaque and potentially misleading, as it includes:
 - £20m subsidy to FES
 - receipt of £20m from the EU towards private sector new woodland creation
 - costs of FCS administration, etc
- the statement about the 2014-20 SRDP funds could point out that £208m of the £266m is already committed, leaving an inadequate sum to support achievement of our planting targets for the rest of the program to end 2020, without additional Scottish funding.

Consultation questions

Q1. Do you agree with our long-term vision for forestry in Scotland?

"Scotland will have more forests and woodlands, which will be sustainably managed as a much greater part of the nation's natural capital, providing a resilient, high quality and growing resource that supports a strong economy, a thriving environment, and healthy and empowered communities."

- In principle – yes, though to emphasise the long-term nature of the strategy, the statement could begin with the words "by 2070".

But the SFS should acknowledge more succinctly that the many social & environmental benefits that forestry delivers can only come from two sources:

- The public purse, where every taxpayer contributes, or
- The private purse, where additionality comes at a cost to business, and needs to be suitably squared with individual businesses, otherwise delivery will not happen.

"Sustainably managed" (and other similar references in SFS to 'sustainable forest management [SFM], etc.')

require a clearer reference to the UK Forestry Standard. SFM is the ethos, whereas UKFS is what it is measured by.

Q2. Does the strategy identify the right objectives for forestry in Scotland over the next 10 years?

Yes, but

- Box 2 containing the vital planting targets seems to exist in isolation, whereas it should be the main priority of the SFS,
- and why is the existing target not mentioned? Born out of the WEAG process it is to plant 100,000 hectares in the decade to 2022, of which at least 60% should be of productive conifer. This target period is not finished yet, and is severely behind – especially in regard to the productive conifer element. We still need to plant about 14,000 hectares a year for the next 3 years to catch up.

SFS should have the WEAG and all the other Box 2 targets as an absolute headline of SFS, and moving into the next era of Climate Change targets, the strategy should be to at least meet these targets, and preferably beat them.

Q3. Do you agree with our assessment of the major issues likely to have the greatest impact on the achievement of our objectives?

Generally yes, but there are some omissions, and we comment on some of the points made, as follows:

4.1 Wood fibre supply and demand –

- The introduction to this section fails to recognise the opportunity we presently have to take **urgent** action in the next decade to build up our softwood and energy wood resource – see our opening general comments above.
- Specific mention should be included of the importance of Sitka spruce to the sector

Supply –

- The softwood fibre availability forecasts are welcome, but are not really good enough yet. More resource should be diverted to developing these, and to take advantage of modern technology to deliver more accurate and up-to-date information.
- Control of woodland removal policy - Needs to mention conflict with powers granted to statutory undertakers under other legislation to fell without need for compensatory planting, and how this will be addressed – e.g. 450 hectares of productive conifers potentially being lost under plans for the Inveraray to Crossaig 275kV Overhead Line Replacement

Demand –

- An excellent and important paragraph, which could again make reference to the present opportunity to increase our productive woodland resource – immediately.
- Mention could be made of the very recent Committee on Climate Change report, which suggests demand for timber and wood products is even

higher than earlier forecasts -

<https://www.theccc.org.uk/publication/land-use-reducing-emissions-and-preparing-for-climate-change/>

4.2 Rural land-use, productivity and integration

- Confor members take exception to this criticism of our industry, which is the only primary land use that has properly consulted with everybody else, for over 20 years. Regional F&W strategies, regional forestry forums, public registers, etc, etc. 20th century forests were not 'badly designed' - they reflected the government policy of the time with a 100% focus on timber production. There is no need to chastise our sector in our own today's strategy.
- Far better to highlight how we have been influenced in new woodland creation and design plans / long-term forest plans by input from other stakeholders and the public, and how we have recently revised how we engage with others. It would be welcome if other sectors similarly invited the forestry sector to comment on/be consulted on their everyday activities and policy and strategy development.
- Forestry is the only land use sector that can demonstrate audited compliance to an international independently certified sustainability standard - UKWAS. UKWAS is a voluntary standard, going above and beyond the requirements of the UKFS. Around 80% of Scotland's timber comes from certified forests.
- UKFS is much more restrictive than the equivalent baseline requirements in agriculture and includes the requirement for non-productive areas, landscape design and public consultation.
- The last sentence of the paragraph on UKFS on page 9 would be enhanced by saying "In 2018, 58% of Scotland's area of forests were certified against the UKWAS, and about 80% of Scotland's timber came from that certified area".

EU exit and future rural land-use

- "integration" is important if it means that other sectors embrace forestry and not that forestry is held back by being included in mechanisms, like SRDP that are designed for other sectors. In these circumstances 'integration' as a policy (which Confor has always supported, but which other land managers have resisted) has been interpreted as a need to administer forestry as if it were a sub-sect of farming. The imposition of farming orientated regulation has simply been at odds with how woodland is managed - e.g. the nightmare of LPIDs, etc.

Complementary land-uses

- We agree with this section, and particularly welcome the last paragraph – "A particularly important outcome of this integrated approach should be to

improve farm viability and enable more farmers to realise the benefits that trees can provide in terms of income from timber, livestock shelter, wildlife habitats, carbon retention, and as a source of biomass energy."

- There is an opportunity in this section to highlight the importance that farmers attach to land on which they are considering planting trees (or have already) to continue to be eligible for the Basic Payment Scheme – or whatever replaces that post Brexit.

Economic development: national, regional and local

"We have seen substantial inward investment in our timber-processing sector and this needs a growing and predictable supply of sustainable wood fibre."

- The sheer scale of this investment could be quantified
- Where are the targets / ambitions to produce this "growing and predictable supply"? See response to Q2 above. Needs more mention in SFS to a presumption in favour of productive softwood on all suitable land – in restock or new woodland sites.

Local enterprise

"..... to forest nursery businesses ..."

- These are not just 'local enterprises' but a vital part of the whole supply chain. In the SFS they deserve a section of their own, and policy & actions to ensure that the public and private sector nurseries can work together to robustly and sustainably provide the plants the sector needs in the future – preferably all home grown.
- Reference should be made to the Confor Nursery Producers Group and to the Forestry Commission's own nurseries which together supply virtually all the forestry tree plants in the UK, and specifically how the one public sector nursery in Scotland (now under FES control) will be supported, etc., and how Scottish Government will support this sector so it can upscale and sustain a significantly increased demand for planting stock in the future.

Supporting rural communities

" ... providing employment opportunities" -

- reference could be provided to SAC's Eskdalemuir report, commissioned by Confor –
http://www.confor.org.uk/media/246147/33_eskdalemuirreportmay2014.pdf

" ... supporting the provision of affordable rural housing," -

- we are aware of some instances on the National Forest Estate of planning permission being granted for housing development in association with

existing (or possibly new) woodland, but are not sure that this is such an easy process on privately owned woodland. Some clarification on Scottish Government (planning) policy would be welcomed here.

Sustainable growth

- There is a major omission in the SFS here – about timber transport, and the need for government investment in the rural roads infrastructure to service industry in the 21st century
- It is regretted that virtually the only reference to this subject in the draft is a negative one – *"and ensure that we minimise any potentially negative impacts on local communities and the environment (e.g. from the transportation of timber)."*
- Confor fully supports the response to this consultation by the Timber Transport Forum, and we have had input to that response. (Confor is a member of the TTF, and via its predecessor organisation Timber Growers was a founder member of the forum.)
- The SFS must include a proper assessment of the challenge that the out-dated rural roads infrastructure faces the forest industry (and the wider rural economy), and commit to improving it.
- We support the continuance of the Scottish Strategic Timber Transport Scheme (STTS), though we seek to refine the scheme by widening eligibility, for example, by single woodland owner confronted with timber transport restrictions. Every load of timber is strategically important.
- The SFS should recognise that the STTS, coupled with the limited resources of local authority roads budgets, are simply not enough to solve the problems which are affecting the whole rural economy, not just forestry.

Innovation and new technology

- We welcome this section, which directly reflects the Scottish Forest & Timber Technologies Industry Leadership Group's (ILG) draft industry strategy 'Roots for Further Growth'.
- The SFS should refer to the ILG and its strategy in this section.

Developing future foresters and upskilling the existing workforce

- This is such an important area for our sector that it merits a priority of its own. The ILG's Sector Skills Action Plan is an excellent start, but some coordination of educational authorities and institutions may be required by Scottish Government for the Action Plan to succeed.

4.6 Climate Change

Mitigation

"Each additional hectare of new forest increases that by an average of about seven tonnes of CO₂e each year," –

- This section should make clear the difference between carbon sequestered long-term by Sitka spruce grown on 40-year rotation compared to native broadleaf woodland.
- Final paragraph on storing carbon and the low-carbon economy – this could declare the intention to argue for the C value of wood products stored in construction to be taken into account in carbon balance accounting.

Tree pests and diseases

- The SFS should be bolder and as plant health is a devolved subject, it should state there will be no trade in imported high-risk plant material, and all imported material will require phytosanitary certification. Scottish Government should also when appropriate support industry requests on improving biosecurity, such as the following recent request:

[High-risk Xylella fastidiosa host plants - Responsible sourcing statement from horticultural and forestry businesses](#)

It is requested that an enhanced statutory measure is put in place for the importation in to the UK of high-risk Xylella host species⁽¹⁾. The proposed measure is: appropriate testing of samples from each consignment of high-risk Xylella host species is to be conducted at point of despatch.

¹. <https://planthealthportal.defra.gov.uk/assets/factsheets/Xylella-host-info-note-version7.pdf>

- This section should draw attention to the ongoing risks from Heterobasidion (which worldwide is arguably the most serious disease present in commercial woodland) and from Dendroctonus micans which is threatening the status of the Pest Free Zone on the west coast and our trade to Ireland.

Wild deer

- Agree with this section, but mention should be made of damage to trees from all herbivores

4.9 Enhancing our natural assets and improving their biodiversity value

Improving native forest and woodland condition

- "The area of Scotland's native forest is expanding ..." This is helped by the present requirement for 10% of every new woodland planted under the conifer models being native woodland. However, this absolute

requirement can be inappropriate in some places, and should be re-examined.

Protecting ancient forests and woodlands

- In relation to PAWS " ... replanting native trees where appropriate,... " Some PAWS sites can be very fertile and grow good softwood. There should not be a presumption that these sites must be returned to native woodland in every case.

4.14 The relationship between the major issues and the 10-year objectives

- Confor members have observed that Table 1 – the relationship between the major issues and the 10-year objectives – does not seem to add to the document. Suggest delete this section?
- And we've had similar comments on Table 3.

Q4. Do the ten priorities identified in table 2 capture the areas where action is most needed to deliver our objectives and vision?

No –

- see comments above under 4.3 Sustainable Growth. A top priority must be getting the rural infrastructure up to a standard fit for the 21st century, not just for forestry but for the whole rural economy.
- Other than the comment at para 5.2 page 39 on working with the UK Government and other UK devolved administrations, there is little reference to the need to maintain a continuing research capacity in forestry, so that scientific evidence to support policy innovation and development remains available to policy makers and the wider forestry and landed community. As Forest Research is now under the control of Forestry Commission in England, the SFS should explain how Scotland's research priorities in the forestry and wood using sector will be delivered.

Otherwise, our comments on the suggested priorities are as follows:

1 Promote and develop the concept of sustainable forest management as it applies to Scotland.

- Agreed, but should be referenced to compliance with UKFS

2 Sustainably expand the area of all types of woodlands and forests across Scotland and ensure harvested sites are replanted appropriately.

- Agreed, but should be expanded to state that at least two-thirds of new woodland should be of productive conifer (bearing mind that if statistics on woodland creation continue to record woodland by the area of the grant model adopted, then 10% by area of every conifer model is actually native woodland – though see comment above at 4.9)

- Add “and as soon after harvest as possible” after “are replanted appropriately”

3 Ensure wood fibre availability from Scotland’s forests is predictable and increases over time.

- Agreed

4. Protect forests and woodlands from damage caused by new or existing pests and diseases, promote the sustainable management of wild deer and build resilience to support adaptation to climate change.

- Agreed, but add after wild deer “and other herbivores”

5. Increase community ownership and management of forests and woodlands.

- Confor understands why this may have been included, and while supportive would focus on the opportunity to achieve this through new woodland creation.

6. Increase efficiency, productivity and the value generated from forest products and services and help develop forestry’s role in creating a low-carbon economy, by supporting technological innovation, improving the capacity and skills of those working in the sector, and developing existing and new markets.

- Agreed, but should be split in two, with “improving the capacity and skills of those working in the sector” being added to a new priority which includes education and increasing public awareness of our sector

7. Increase the natural capital value of Scotland’s woodlands and forests by improving the condition of native woodlands and forests, and increasing the positive impacts of forest and woodland management on biodiversity, air, water, soils, flood management, landscapes and the historic environment, mitigating the risks of negative impacts.

- Is this not simply repeating priority 1? SFM as defined by compliance with UKFS

8. Increase the use of Scotland’s forests and woodlands to improve health and well-being, help people better understand forestry, and support wider Scottish Government activity to help children become confident and resilient members of Scottish society.

- Agreed

9. Enhance forestry’s contribution to sustaining viable rural communities and increase the positive impact of forest and woodland management on other businesses, especially in agriculture and tourism.

- If this means supporting continuous jobs in forestry, then we agree, but otherwise it is hard to understand why this is seen a top priority.
- Nevertheless, forest tourism has become an important part of Scotland's economy, with potential for long-term growth. Informal recreation also continues to grow, and Scotland's forests are an important asset as the Government encourages people to adopt healthy & active life-styles.

10. Increase the positive contribution that urban forestry makes in Scotland's towns and cities.

- Agreed, though we don't feel the word 'urban' is necessary

Q5. Can you provide any examples of delivery mechanisms that have previously been effective in delivering similar objectives and priorities?

- WGS / SFGS and associated Challenge Funds

Q6. For any delivery mechanism examples given in answer to question 5, please explain why they worked well?

- They were perceived by applicants as simpler and more effective grant schemes that delivered without the complexity and bureaucracy inherent in the current scheme
- That they operated in an era when Forestry Commission was still a government (sub) paying agency is relevant

Q7. Do you think the proposed progress indicators are the right ones?

- *Increase the contribution of forests and woodlands to Scotland's sustainable and inclusive economic growth:*
 - *Contribution of woodlands, forests and the forest sector to the Scottish economy (GVA and jobs). **Agreed, and forestry GVA and jobs should be readily identifiable as a sector contribution, not just one that is linked in with agriculture as at present***
 - *Volume of available wood fibre. **Agreed – vital we have better information than present. Biological data of the growing resource is needed, but there also has to be some objective judgment on the financial viability of bringing that fibre to market***
 - *Area of woodland and forests. **Agreed, but need to add stocked area by species, and this means better and quicker analysis of restock areas** (species data needed for better planning of plant production)*
 - *Area of new woodland and forest creation. **Agreed, plus better information on species***
- *Protect and enhance Scotland's valuable natural assets, ensuring that our forests and woodlands are resilient and contribute to a healthy and high quality environment:*

- *Woodland contribution to Natural Capital Index. **Agreed on basis it will include all types of woodland and their individual contributions***
- *Proportion of protected woodland and forests with natural features in favourable condition.*
- *Area of new native woodland and forest creation.*
- *Use Scotland's forest and woodland resource to empower more people to improve their health, well-being and life chances:*
 - *Numbers of visits to forests and woodlands.*
 - *Area of forests and woodlands that are owned by communities.*

Q8. Do you have any suggestions for other indicators we could use to measure progress (especially ones which draw on existing data)?

Q9. For any indicators suggested in answer to question Q8, please explain why you think they would be appropriate.

Q10. Would you add or change anything in the Equality Impact Assessment (which includes our assessment of the potential impact of the strategy on inequalities caused by socioeconomic disadvantage – Fairer Scotland Duty)?

Q11. Would you add or change anything in the Business and Regulatory Impact Assessment

Q12. What are your views on the evidence set out in the Environmental Report that has been used to inform the assessment process?

Q13. Should any additional evidence sources be used in the Environmental

Report? Please provide details.

Q14. What are your views on the predicted environmental effects as set out in the Environmental Report?

Q15. Do you agree with the conclusions and recommendations set out in the Environmental Report?

Q16. Please provide any other further comments you have on the Environmental Report.

Q17. Do you have any other comments you would like to make about the draft strategy for forestry in Scotland?

In accordance with the principles of SFM, and on the basis of available evidence, managed woodlands and forests deliver most benefits. That should be the aim for all new planted woodland and forest as well as existing woodland and forests.

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