



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Response form

A consultation on our 2019/20 Fees and Charges scheme

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Question 1. What are your views on the proposed increase to Waste, Installation, Material Recovery Facilities and EU ETS charges?

Question 2. What are your views on the proposed increase to the abstraction standard unit charge?

Question 3. What are your views on the proposal to increase NRW hourly rate for COMAH regulation?

Question 4. What are your views on the proposal to charge a fixed fee for assessing a Waste Recovery Plan?

Question 5. What are your views on the new proposals for Medium Combustion Plant Directive?

The consultation document and the questions above indicate that the consultation is not proposing an introduction of a fee for the determination of a felling licence. It is only the advice service that is now proposed to be subject to a charge.

Confor understood that this matter was raised for consideration amongst the stakeholders but has not been made aware that the new charges would be introduced without receiving further evidence or representation from the forest industry. It is also noted that the period of free pre-application advice has been reduced from three hours to two.

The consultation document states that 'Where the level of detail and site-specific nature require technical input beyond the scope of basic advice NRW can provide bespoke advice

through our discretionary advice service which is charged at our hourly rate of £125 per hour.’

A professional agent undertaking the work required by a client to submit a felling licence receives on an average a fee of £60 per hour. The charges and fees must be made commensurate to the technical skill and complexity of the service provided.

In England and Scotland, the costs of producing management plans and within those felling licences may be recovered by means of a Management Plan Grant. Within Wales the lack of support for the woodland owner means that this is a real cost in terms of the profitability of the proposed operation.

The likely outcome of this introduction of fee will be to sterilise smaller felling and management schemes. The larger scale operations will be prepared and documented by forestry professionals familiar with the complex system of application.

Smaller woodland owners and forestry operators who historically have relied on the support of NRW to produce felling licence applications will no longer afford or be capable of submitting an application. The net effect of this will be to reduce the area of forestry in ongoing management and to reduce the availability of timber supply in an already stretched market.

The impact will not only be a commercially damaging but also poses a significant risk to older under-managed woods that are reliant on small timber incomes to cover management costs and ensure that biodiversity habitats and maintenance continues.

This is directly at odds with the Woodland for Wales Strategy which states ‘we aim to maintain the overall productive potential of Welsh woodlands at a national scale. We intend to do this through our twin strategies of bringing more woodlands into management and increasing woodland cover, and by supporting initiatives and strategies that increase the economic potential of woodland managed for a range of benefits.’

If there is to be the creation of a charge for the preparation of a felling licence it must be in conjunction with a program to simplify the application process and felling licence itself. There is a feeling within the forest industry that felling licences are being asked to comply with standards in excess of the UK Woodland Assurance Standard and that aspirational Welsh Government policy is being implemented not through legislation but via the back door.

Responses may be made public – on the internet or in a report. Please see section 6.2 of the consultation for more information on this. If you would prefer your response to be kept anonymous please tick this box