

## **Confor response to Welsh Government Draft Climate Change Adaptation Plan for Wales**

Confor is the not-for-profit organisation for sustainable forestry and wood-using businesses in the UK. We have more than 1,500 member companies representing the whole forestry and wood supply chain. Confor focuses on the strategic issues that are vital to the success and sustainable future of the sector. These include helping to build the market for wood and forest products, creating a supportive policy environment and helping members to become more competitive and successful.

This response only covers the issues which relate to forestry and timber.

### **Key recommendations**

Confor recommends that Welsh Government:

- Set a new target to plant 70,000 hectares new woodland by 2030, by scaling up woodland creation each year, and focusing on new timber-producing woodlands as a self-sustaining and multi-benefit approach.
- Provide a long-term suitable support system to bring unmanaged native woodland into good condition.
- Give prominence to nature-based solutions by including it as a bullet point under the second action, CCAPW-ST2: 'Adopt a nature-first approach to climate change adaptation planning across all public bodies in Wales.'
- With climate action urgent, and the timetable of Brexit deeply uncertain, Welsh Government should prioritise the proper resourcing of NRW immediately, knowing that, in future, the devolution of European funds should enable greater budget flexibility across in future.
- Implement policies to ensure that within five years there is no trade in high-risk imported plant material, driven by a lack of demand:
- Implement policies to ensure that within five years, financial and regulatory incentives make it easier and cheaper to supply firewood by managing Welsh woodlands than to import it.
- Include Welsh timber in the 'brand Wales' marketing campaigns, as a quality product which contributes directly to Wales' climate change adaptation.

**Overall, to what extent do you agree with the potential actions for adapting to climate change set out in this document?**

## *Forests and woodlands*

Confor is pleased to see woodlands given first place as an asset for carbon storage and sequestration, and climate change adaptation. The authors of the report should be aware, however, that while a 2,000 ha target appears a significant increase in tree planting, the current levels represent years of lower and lower delivery. This 2000ha target is not ambitious enough and will miss the 66,000 CCERA target by some 44,000ha.

In July 2017 the Welsh Assembly CCERA Committee ran a major consultation on woodlands, and that 'the biggest issue raised by respondents to the inquiry was the lack of new woodland creation in Wales'. Their report noted that the Welsh Government's Climate Change Strategy (2010) called for 100,000 hectares of new woodland over the next 20 years, but only 9.2% of the planting which should have occurred had taken place. The Committee reported that:

"We are pleased that the Welsh Government will maintain the target of 100,000 ha of new woodland creation between 2010-2030. [...] However, [...] a fundamental change in the approach to woodland creation in Wales is needed. It is unclear how the Cabinet Secretary intends to address this. [...] The Welsh Government must, as a matter of urgency, refresh its woodland strategy [...] The refreshed strategy must include long term targets for woodland cover and must incorporate commercial forestry."

18 months on, two more unfulfilled planting seasons mean that only 4,000ha, 8% of what should have been planted, has been delivered since 2010, probably not even enough to compensate for woodland that has been lost. Wales is likely to have been suffering net deforestation for many years.

In December 2017, the Committee on Climate Change recommended a target of 4,000 ha/year, 1,000 ha down from the 2010 target.

In 2018, the Welsh Government's new Woodlands for Wales strategy set the target of just 2,000 hectares. The government's proposals for public goods and economic resilience schemes under a post-CAP funding framework raise the possibility of a step-change in funding for forestry after Brexit, but the plans are incomplete and do not address the significant barriers to land use change which prevent woodland from being created (discussed further in the next question).

Confor recommends that Welsh Government recognise the potentially disastrous consequences of this dwindling of ambition for climate change mitigation and adaptation. We recommend that Welsh Government set a new target to plant 70,000 hectares new woodland by 2030, by scaling up woodland creation each year.

In terms of the composition of this new woodland, we recommend that the most cost-effective approach is to focus on planting forests which will produce timber while delivering Natural Capital benefits:

- Timber-producing forestry designed to the UK Forestry Standard delivers a significant proportion of the natural capital benefits of native woodland with lower maintenance liabilities and shorter financial breakeven points. The standard includes a requirement to plant native trees and incorporate open spaces as part of the forest design.
- Fast-growing conifers can sequester carbon two or three times faster than native trees, and timber used in construction locks up the carbon for the longer term and provides low-carbon material for climate adaptation work such as building better housing.
- Timber-producing forests creates a new income stream for landowners, sustaining existing rural businesses and allowing land to remain in productive cycles whilst delivering climate change adaptation benefits.
- The establishment and maintenance of new native woodlands is at a higher risk of failure due to browsing and invasive species pressures. These multiple management issues are labour intensive resulting in a higher level of economic support being required. There is a risk that these native species woodlands could be neglected due to financial pressures and become problematic unmanaged woodland.

Successful delivery of Wales' native woodland to provide the climate adaptation benefits will require substantial investment, in the form of management grants to bring existing native woodland into better condition.

### *Plant health*

Climate change, exacerbated by increased global trade, is already bringing increased threats from invasive pests and new diseases which threaten our woodlands and their carbon and climate benefits.

In a recent policy paper, Confor recommended a series of plant health measures to build resilience in a cost-effective collaboration between industry and government, by reducing imports of the two major plant health threats: live plants in soil, and firewood:

In five years there should be no trade in high-risk imported plant material, driven by a lack of demand:

- Ban imported trees in pots immediately, and address the significant risk from smaller plants in pots.
- Stabilise grant schemes, streamline application processes and meet deadlines for granting planting permissions to enable nurseries and forest managers to plan home-grown nursery stock demand and reduce the need for imports.
- Require phytosanitary certification for all imported plant material
- When all these measures are in place, specify than grants will only support UK-grown stock.

In five years, financial and regulatory incentives must make it easier and cheaper to supply firewood by managing Welsh woodlands than to import it:

- Ban imported firewood
- Report the area of woodland under management
- Promote Welsh-grown firewood and provide grant support for woodland management

### *Nature-based solutions*

It is encouraging to see the prominence of nature-based solutions to climate change adaptation as a thread running throughout the text. We consider these to be fundamental to building long-term resilience to more extreme weather events rather than temporary fixes. By default, nature-based solutions to adaptation simultaneously contribute to climate change mitigation: atmospheric carbon is the building block of nature, and wherever nature is richer, more carbon is stored. By contrast, most technological or engineering solutions will result in some carbon emissions. While this might seem self-evident to the authors of the report, nature-based solutions are not likely to be in the forefront of the minds of other departments who may see them as too unfamiliar or complex. We would recommend nature-based solutions mentioned as a bullet point under the second action, CCAPW-ST2: 'Adopt a nature-first approach to climate change adaptation planning across all public bodies in Wales.'

**Please tell us if you have any ideas for how we should deliver the potential actions for adapting to climate change.**

If nature-based solutions are to be at the heart of climate change adaptation across a sustainable Welsh economy, then this needs to be properly resourced.

The problematic nature of Natural Resources Wales management of Wales' National Forest Estate (40% of all Welsh woodlands) has been the subject of much recent publicity.

Natural Resources Wales is the gate keeper for woodland creation and management in the private sector. The serious under-resourcing of staff members to process woodland creation applications and promote forestry and woodland management to farmers, using a system that is not fit for purpose, and a grant pot of under £1m, is completely inadequate to deliver the required woodland policy vision.

If the Welsh Government wants to succeed in using nature-based solutions to tackle climate change, it needs to prioritise it and commit some serious resource to its delivery. Woodlands are amongst the most cost-effective measures for climate change mitigation and adaptation, but that does not mean they come free. Forestry is a

very small part of the Energy, Planning and Rural Affairs budget which is only 2% of the Welsh Government budget (Figure 1). While this may be transformed if the funding currently provided to the rural sector via the EU is devolved to Wales after Brexit, NRW and RPW in its present form will be completely inadequate to administer the funding. With climate action urgent, and the timetable of Brexit deeply uncertain, Welsh Government should prioritise the proper resourcing of NRW immediately, knowing that, in future, the devolution of European funds should enable greater budget flexibility across in future.

Welsh Government Budget 2019-20, £millions

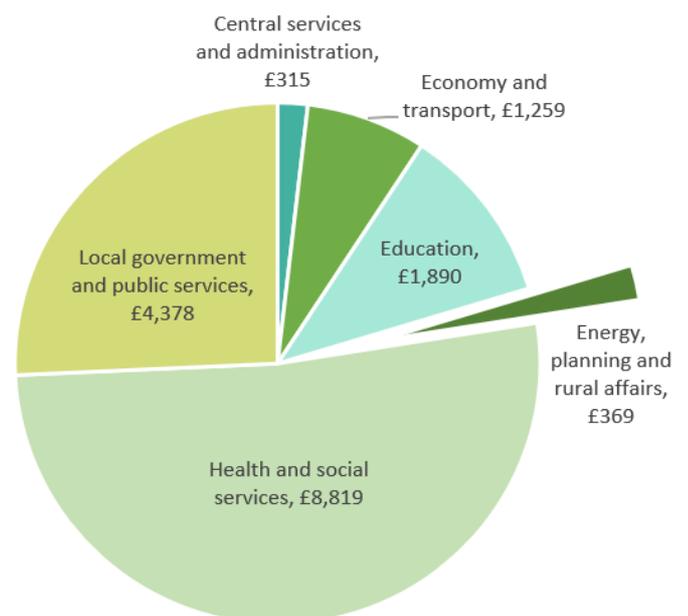


Fig.1 Source: National Assembly for Wales

**We strongly believe everybody has a role to play in adapting to climate change. What ideas do you have to adapt and contribute to our objectives?**

Policies to enable greater buy-in and participation in woodlands and forestry would help to generate momentum for them as nature-based adaptation solutions across Wales. For example:

- Whole-farm carbon measurements to encourage and support farmers who want to incorporate forestry into their business rather than regarding it as an alternative and competing land use.
- Encourage new forms of forestry investment, for example community ownership and crowd-funded forestry, to substantially increase and diversify the number of people with an interest and stake in woodlands and forests.

### **What else can Welsh Government do to improve communication around the risks and impacts of climate change and the need for adaptation?**

There has been a lot of publicity recently about the importance of 'Brand Wales' in telling the story of Welsh produce.<sup>1</sup> Timber is an important Welsh product which should be given marketing resources as part of the 'Brand Wales' campaign. Its vital role in sequestering carbon (in forests and timber products), and adapting to climate change (in resilient landscapes and better housing), should be communicated and celebrated alongside its other benefits as a quality product which sustains numerous rural jobs.

### **How can you contribute to communicating the risks and impacts of climate change and the need for adaptation?**

Confor has produced a range of resources to communicate the role of forestry and timber in adapting to climate change and mitigating its impacts.

### **How do you think the potential actions to adapt to climate change might affect you or the organisation you work for?**

If there were an active shift to encourage the take up of forestry as a tool to minimise the impact of climate change, as well as sustaining rural business and employment the role of Confor would:

---

<sup>1</sup> <https://www.bbc.co.uk/news/uk-wales-47199506>

- Develop to help land managers establish new forestry schemes.
- Focus on creating added value for forestry products.
- Develop routes for new foresters to join the industry and benefit from high quality rural jobs.

**How do you think the potential actions in this plan might affect the following? Public health, Communities, The Welsh language, Equality, Children's rights**

*No answer*

**How do you think the potential actions to adapt to climate change might contribute to achieving the national well-being goals?**

*No answer*

**Do you have any other comments about this consultation?**

*No answer*

Anthony Geddes

04 March 2019