

Confor response to Forestry Commission call for evidence on controlling oak and sweet chestnut timber imports to prevent the introduction of oak lace bug into Great Britain

Introduction

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.

Confor has worked with our member organisations and Governments across the UK to tighten bio-security and reduce the risks from imported pests and diseases.

Confor's work on "Plant Health and Brexit" has been widely shared within the industry <https://www.confor.org.uk/media/246818/plant-health-and-brexit-statement-jan18.pdf>

Main Points

Tree health is of paramount importance, and any future bio-security restriction must be developed with the full support of the industry

There needs to be urgent research to precisely understand

1. How much hardwood timber (Oak and Sweet Chestnut) is imported into the UK – what species and in what forms (round logs, sawn timber etc). Consultation states that 3,100 tonnes are imported, initial research by Confor suggests that this figure could be closer to 60,000 tonnes per year.
2. How much imported round wood hardwood timber is milled by UK sawmills, and what per centage is this of their overall output.
3. Precise location of all UK sawmills processing imported timber
4. What economic impact would the proposed import restrictions have on each mill.
5. What economic impact would the loss of any hardwood sawmills have on nearby timber producing estates, and subsequent impact on woodland management. Circa 50% of England's broadleaved woodland are not currently receiving any management.
6. Full risk and impact analysis of proposed timber import restrictions on limiting spread of Lace Bug. Full considerations must be given to likelihood of Lace Bug being imported on dunnage, pallets and live trees.
7. Current geographic spread of the Lace Bug and the impact of climate and temperature on its likely future spread.
8. How much hardwood round wood timber moves across the UK border on the island of Ireland and could this be effectively regulated.

Discussion

The consultation suggests that the UK would be unable to make use of the EU Protected Zone system to manage imports, but that UK hardwood sawmillers would be required to obtain authorisation to issue plant passports and obtain phytosanitary certificates to certify the movement of imported oak.

The proposed control methods (paragraph 11 in the consultation document) for Oak imported from areas where Oak Lace Bug is present, are unworkable in current trading conditions.

UK hardwood sawmillers have imported timber “in the round” for centuries, without these imports there is simply insufficient domestically grown timber for the mills to saw and process, and to support continued investment in processing capacity and skills.

Without these imports, most UK hardwood sawmills would simply have to close. This would mean a loss of capacity to saw and process domestically grown Oak. This would have a devastating impact:

1. Grown in Britain Oak could not be milled in Britain
2. Loss of centuries of skill and tradition in hardwood sawmilling
3. Loss of markets for domestic timber, which would then lead to more Oak being imported.
4. Loss of downstream business, jobs and skills in construction, carpentry and furniture making.

The Grown in Britain Woodstock report from September 2016 clearly highlights the many challenges and opportunities for the UK hardwood sector. Evidence from this report must be carefully analysed to better understand the potential impacts of import restrictions. <https://www.growninbritain.org/wp-content/uploads/2016/09/GiB-WoodStock-WS5-Final-Report-FINAL-Sep-16.pdf>

The UK hardwood sawmilling sector is an important and very resilient sector which has survived decades of change, these additional restrictions would be the final hammer blow.

The need to control Oak Lace bug is vital, but Oak timber in the round is just one of several vectors. It is worth considering that the most likely vector for many of the recently introduced tree pests and diseases is large trees for landscaping, and packaging material. It is unclear whether any pests and diseases have been imported as a result of timber on the round.

Confor’s Plant Health policy on restricting imports of firewood and plants in pots. <https://www.confor.org.uk/media/246818/plant-health-and-brexit-statement-jan18.pdf>

Conclusion

Oliver Rackham famously stated that “the wood that pays, is the wood that stays.” English Oak woodlands have been the jewel in the crown of our landscapes for millennia. The loss of sawmilling capacity to process their timber would mean the economic value of these woodlands will decline significantly.

The protection of the UK’s forest and woodlands is of primary importance, but the trade-offs and potential impacts of import restrictions needs to very carefully considered.

The loss of any hardwood sawmilling capacity in the UK will have far reaching consequences on the management of many of the UK’s finest stands of hardwood. Equally importantly it will make the Government’s commitment to bring more broadleaf woodland into management many times more difficult.

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