

Consultation response (July 2019)

Forestry and Land Scotland – draft Corporate Plan 2019 - 2022

Confor welcomes the opportunity to respond to the consultation on the draft corporate plan for Forestry & Land Scotland (FLS) for the period 2019 – 2022.

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 wood processors.

Due to the scale of operation of FLS being responsible for approximately one-third of Scotland's forests, how the national forest estate (NFE) is managed can have a significant effect on all members' businesses. This corporate plan is therefore very important.

General comments

Generally this is an admirable and well thought-out document, full of everything that one expects from a public sector organisation in the 21st century. However we have some comments and suggestions which we hope will be taken constructively.

It is understood that it is a statutory requirement for a Public Corporation like FLS to have a Corporate Plan, but some members have expressed confusion about who is the target audience for the plan. Is it merely a Government statement, or is it an explanation about FLS for the general public? It seems to be the latter and as a consequence, sometimes uses bland or not particularly meaningful language for those in the forestry and wood-using sector. An early example of this is calling what is widely known as the NFE as 'forests and land owned by Scottish Ministers' – we hope that the easily recognised term NFE can be retained in future, perhaps in conjunction with the term 'land', given FLS's wider remit than the former Forest Enterprise Scotland.

Vision, Mission and Corporate Outcomes

The vision *Forests and Land that Scotland can be proud of* could be construed that we are not already proud of the NFE, and it is suggested this could therefore be improved by saying '... can be even prouder of'.

The mission *To look after Scotland's forests and land, for the benefit of all, now and for the future* implies FLS has responsibility for **all** of Scotland's forests, which is obviously not the case. So we feel it would be more appropriate to refer to looking after Scotland's National Forest Estate for the benefit

However we suggest that 'look after' is a weak phrase and not an adequate description of the professional management of the estate.

And taken together, the vision and mission could/should be stronger – FLS have huge potential to drive change and increase development & improve resilience in rural Scotland – FLS could/should also be leading research and development in silviculture, etc. We therefore suggest that at least the mission statement can be improved.

The summary of corporate outcomes at paragraph 6 seems admirable, but it lacks any prioritisation of what is most important in a relatively short-term plan of only three years. No organisation can effectively deliver all things to all men all the time – so there should be greater acknowledgement of the trade-offs between competing objectives, plus proposals about how management decisions regarding trade-offs will be considered and assessed.

We do not feel the plan fully reflects the Cabinet Secretary's endorsement of Scotland's Forest Strategy (SFS) when he says, in a change to the words which were in the original consultation draft of the SFS:

"I want forestry in Scotland to play a significant role in driving forward our rural economy and also our ambitions to make Scotland a low carbon economy and a world leader in dealing with the threat of climate change."

This suggests that the plan should confirm that outcome 6.1 *Supporting a Sustainable Rural Economy* should be recognised in the plan as the driver which will deliver the other outcomes.

UKFS

The summary also lacks reference to the UK Forest Standard, and we suggest this could be included in the first outcome –

'... by managing the national forests and land to the UK Forest Standard, and in a way that encourages ...'

UKWAS

Although only mentioned once in the document, most people won't know what UKWAS is. There is a risk of underselling the quality of professional forest management on the NFE, and thus NGOs may consequently demand greater concessions. We suggest this aspect is given greater importance, and that there is explanation of what UKWAS means by reference to "independent assessment to international standards of sustainable forest management".

Value

It would be good to see some measures of "value" – economic, environmental and social. There is reference to "Natural Capital Value" but no actual measurement or clear aspiration.

Forest products

Timber is mentioned several times, but fibre only once. It might be better if at some point the plan talks about "forest products" (fibre, resin and timber) and mentioned an aspiration to increase the "value of forest products harvested from the NFE."

Resilience

FLS focus should be on making the NFE and Scotland increasingly resilient. This could be by expanding the forest resource, reducing dependence on imports, better management, bringing more forests into production, etc. It is noted that a programme of actions will be developed, and we hope these suggestions can be included.

Key Performance Indicators

That these have yet to be identified and published is regretted - some members are unhappy with this omission, as it makes it more difficult to comment on the fuller explanations in paras 6.1 to 6.5.

For example, in 6.1 the statement *We will help deliver on this priority by ensuring wood fibre availability from the national forests is predictable* is welcome, as is the day to day action *Providing a sustainable supply of timber to Scotland's timber processing sector*. But all this would mean far more to the sector if it was qualified – as we believe it should be for the relatively short-term of the plan – as bringing not less than 3.1 million tonnes of round timber to market each year.

Climate change

There is surprisingly little mention of climate change in the plan, and the role that forests play in mitigating its effects. Given the recent report from the Committee on Climate Change and the First Minister's declaration of a Climate

Emergency, we feel the plan should be more specific and ambitious about creating more new woodland on the existing or an expanded NFE.

The plan does not contain a summary of what the long-term intentions are on the NFE for any alteration to the balance between productive conifers and native broadleaves, and whether this should be reviewed as a consequence of the Climate Emergency declaration. We feel this needs addressed and that the plan should include:

- the current species make-up of the afforested part of the NFE,
- comment on how this will change during the plan period – more than simply by reference to '*Implementing the Restocking Strategy*'.
- how much of the NFE is undergoing peatland restoration,
- how this will impact on the productivity of the remaining softwood resource – and whether this will be counter-balanced by the planting of improved stock or new planting.
- what consideration is being given to growing an element of short rotation forestry (SRF) on the NFE to help mitigate the predicted dip in roundwood supplies from about 2035 – especially for the biomass and wood panel sectors. This might include comment on growing eucalypts.

Scottish Forest & Timber Technologies (SFTT) and Forest Research

We are surprised that there is no reference in the plan to SFTT – to its Industry Leadership Group and its strategy '*Roots for Further Growth*'. FLS are playing an important role in this group.

Similarly there is no reference to what FLS is presently contributing to forest research and what is intended during the course of the plan.

Nor is there much reference to how FLS is currently working so effectively in a cooperative way with the private sector, which is so welcomed, and ably demonstrated by FLS recently taking up Associate membership with our organisation Confor.

Financial information

Confor has consistently called for financial information on the NFE to be presented more meaningfully, both in budgetary proposals to Parliament and in annual reports. It is regretted that para 10. *Resourcing Our Plan* continues previous practice. We request that the information is presented in a different way – one that reflects the complexity of management of the NFE viz a 'normal' forest holding. We suggest that the following summaries instead of those in the Financial Resources Table:

- income, expenditure and surplus/deficit - shown separately - of:
 - the core forest management, including forest roads
 - deer management – rents received, venison sales and costs

- renewables – wind, hydro, etc
 - other non-forested land
 - visitor centres
- new woodland investment programme –
 - sales & purchases of land
 - costs of new woodland creation
- other capital income & expenditure
- detailed comment on the use of any 'Reserves'
- Scottish Government ASL to balance the books

We would be pleased to discuss any of these comments and look forward to a positive relationship with FLS in the future, and to helping the agency deliver their Corporate Plan.

Confor

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