

Scottish Climate Change Plan update

RESPONSE TO JOINT CALL FOR VIEWS FROM PARLIAMENTARY COMMITTEES

Confor (www.confor.org.uk) is the not-for-profit organisation for the UK's sustainable forestry and wood-using businesses. It has 1,500 member companies, representing the whole forestry and wood supply chain.

This is a response to the [joint call for views](#) on the Scottish Government's [updated Climate Change Plan](#), laid before the Scottish Parliament on 16 December 2020. This update is an interim step on the way to the next full plan, in 2025.

Forestry and wood are affected by issues covered by all four committees, and policies affecting our sector in one area will have impacts (for example in terms of timber demand and availability) on others. For this reason, Confor has prepared a joint response.

The committees have asked for evidence by 12 January on:

- Progress to date in cutting emissions
- The scale of reductions proposed within the sectors and appropriateness and effectiveness of the proposals
- The appropriateness of the timescales
- The extent to which the proposals and policies reflect considerations about behaviour change and opportunities to secure wider benefits
- The extent to which the CCPu delivers a green recovery.

Environment, Climate Change and Land Reform Committee

Remit includes: overview and governance of the whole plan; peatland; behaviour change; water, resource and land use; waste and circular economy.

Overview and governance

ECCLR should work with other committees to consider the following cross-departmental issues:

- Whole-system approach to wood supply and use – Proposals for land use, housing, industry, waste, bioenergy, and negative emissions technologies must be developed as part of a whole-system forestry and wood strategy, from seed availability to final disposal of wood at end of life. This is essential to ensure that this key resource is produced in sufficient quantity and deployed in the most carbon-smart ways.
- Green recovery (RECC, LGCC, EEFWC) – A whole-system approach should be taken to recruiting and training the workforce required to deliver the climate change plan and the green recovery. The major increases required in the rural workforce, the new manufacturing

skills, and other skills requirements should share a joint strategy and promotion, to attract talent as wide and diverse as possible. This should include marketing rural opportunities to urban audiences who may be interested in a move to the countryside. If these workforce challenges are tackled piecemeal by the relevant departments, opportunities will be missed.

- Native woodland management (RECC) – to propose policies for bringing native woodland into management to meet ambitious Climate Change Committee targets. (land use/ forestry)
- Peatland and habitat restoration (RECC) – to understand the opportunities provided by forestry investment for delivering nature restoration targets (land use/ forestry)
- Diet change (RECC) – to scrutinise whether Scottish Government diet change advice is suitable for Scottish low-carbon land use and in line with Climate Change Committee recommendations (behaviour change/ land use)

These are discussed in more detail in submissions to the relevant departments.

Peatland and habitat restoration

Confor welcomes the development of a Peatland Restoration Standard. This could helpfully be designed as a companion document to the UK Forestry Standard, and share many of the same provisions. It would be worth considering with RECC a low-carbon Farming Standard to form an integrated suite of guidance and a level playing field for climate-friendly land management.

Peatland restoration is undertaken as an adjunct to woodland creation increasingly frequently. Where a site has been purchased for forestry investment, land which is unsuitable for planting is often suitable for peatland restoration; and the presence of managers, contractors and machinery on site enable delivery of both outcomes efficiently.

Habitat enhancement (planting native trees, improving condition of designated sites, improving condition of freshwater) is a condition of all new forestry schemes. Every 10,000 hectares of 'productive conifer' (such as spruce) which is planted will be delivered alongside at least 2,500 hectares of new native woodland, designed open ground, and diverse conifer, managed for biodiversity benefit. In addition to this regulatory minimum, on sites where larger areas are suitable for native woodland creation, further areas will often be planted in addition under other forestry grant schemes.

For example, at Halkhill and Blair Park in Ayrshire, 350 hectares of peatland restoration and 140 hectares of amenity woodland was made possible thanks to the income which 400 hectares of wood-producing forestry will provide. At Cambusmore in Sutherland, a 6000 hectare estate is being rewilded with 2 million trees, mostly native upland birch and Scots pine, in a conservation-led project which will also provide wood fibre for panelboard manufacture and income to the estate.

It is therefore vital that the ECCLR Committee work closely with RECC to understand its forestry remit and the extent to which delivery of outcomes in its remit are driven by investment in timber growing.

The integration of the Woodland and Peatland carbon codes is a welcome step which will facilitate integrated land use of this kind. ECCLR should explore other opportunities to engage forestry investors in nature restoration.

Waste and Circular economy

Recycling 70% of all waste by 2025 will be facilitated by replacing hard-to-recycle materials such as plastic and concrete with easily recycled wood-based materials. The wood supply required to deliver this shift without increasing our import footprint should be calculated. This kind of substitution to materials which can valuably be recycled and energy (and CCS) ultimately recovered, should be central to the top rung of the waste hierarchy: prevention.

The amount of hard-to-recycle materials going into the Scottish economy should be added as an indicator in the monitoring framework, as bringing this figure down is fundamental to a circular economy.

Rural Economy and Connectivity Committee

Remit includes: forestry, transport.

Forestry

Confor welcomes:

- progress made to date on woodland creation targets.
- the commitment to continue to invest in increasing forest cover in Scotland, backed by £150m budget commitment to increase woodland creation to 18,000 by 2024/25, including investment in the nursery sector.
- The investment in staff resources in Scottish Forestry and Forestry & Land Scotland which is vital to ensure the smooth processing of forestry permissions and recruiting people to careers in the sector.
- The commitment to promote use of timber in construction and private investment in forestry.
- The commitment that ‘the LULUCF sector will form a key plank of our green recovery from Covid-19’.
- Recognition in the proposals that ‘we have a finite amount of land, and are making increasing demands upon it’, that ‘around a fifth of agricultural land in Scotland will be required to change use, which may include not farming on peatland or using farmland to plant trees’; and that ‘nature-based solutions to climate change, such as high nature value farming, offer a sustainable means of producing the products we all depend on such as food and timber.’
- the commitment to maintain the UK Forestry Standard articulating the consistent UK-wide approach to sustainable forestry, and to maintain forestry and woodland strategies.
- the new commitment to support a plant and seed supply strategy.

This year the government’s regulatory process which facilitates woodland creation has been disrupted by Covid-19 resulting in targets being missed. It will be important to meet future targets that resource is adequate to catch up and to buffer against future pressures on resource outwith our control, for example the need to issue felling permissions for ash dieback.

Wood products

In addition to promoting timber in construction and forestry investment, it would be valuable for Scottish Government to also promote the benefits of Scottish timber products to consumers.

RECC must liaise closely with LGCC and EEFWC to ensure that wood processing is considered alongside other proposals for industry, construction, bioenergy and waste. A whole-system forestry and wood approach is required to ensure that this resource is produced in sufficient quantity and deployed in the most carbon-smart ways. This is explored further in the LGCC and EEFWC submissions below.

The RECC Committee must work with other committees to ensure that the workforce required for forestry and wood-processing is recruited and trained as part of a whole-system strategy for Green Recovery.

Seed supply and forest nurseries

The welcome investment in nursery production is at risk of being offset by the challenge of dealing with imminent withdrawal of Basamid for soil sterilization. The current alternative, steam treatment, is not only a very costly investment but a significant carbon emitter, relying on heavy usage of diesel. Since the majority of trees planted in Scotland are grown in bare-root nurseries which rely on soil sterilization, this is a major and immediate problem for future tree supply and decarbonisation of industrial processes.

Forest nurseries should also be consulted, and if necessary supported, through the withdrawal of horticultural peat.

Native and broadleaf woodland management

One important gap in Scottish Government policy is bringing native woodland into active management. The Committee on Climate Change 6th carbon budget requires 67-80% of broadleaf woodlands in the UK to be managed sustainably by 2030, a significant increase from present levels.

We welcome the inclusion of Woodland Ecological Condition in the monitoring framework which will help to demonstrate the success of broadleaf woodland management (reduction in browsing pressure, diverse ages of trees etc). However, the policies to deliver improvement are currently lacking.

One reason for the failure to achieve progress on native woodland management may be that it falls between the environment and rural economy departments. While a forestry activity, the aim of management of this type of woodland is primarily biodiversity and carbon benefit, with wood production a secondary consideration, although it may be an important driver of native woodland management on the ground. Consideration should be given to increasing the incentives to manage Scotland's existing native and broadleaf woodland resource. This would require a substantial increase in the grant budget.

The collaboration between Forestry and Land Scotland and NatureScot in restoring the industrial landscapes of the Central Belt must include leading a major effort to tackle the damage done to woodlands and habitats by increasing populations of grey squirrel and deer.

RECC should work with ECCLR to advise government on how to improve deer management and promote Scottish wild venison as a sustainable meat. This will include helping to overcome the barriers to its wider sale in supermarkets (see also diet change, below).

Bringing native woodland into management is also a key policy issue in England. Scotland can learn from the thinking being done in England around development of woodland management incentives as part of Environmental Land Management.

Peatland and habitat restoration

RECC should work with ECCLR on links between forestry investment, and peatland/ habitat restoration (see above).

Capacity-building in peatland restoration should be regarded as part of wider capacity-building including the forestry contracting sector, as the same contractors will often work in both areas. It will be important to build the real capacity of this sector, and not take resource away from ground preparation for woodland creation.

Integrated farm landscapes

We welcome the exploration of ‘multi-faceted land use including forestry, peatland restoration and management and for biomass production’. Integrating wood-producing forestry into agricultural landscapes, including shelter belts, mixed forests connecting fragmented farm woodlands, and short rotation forestry, provides significant opportunities for rapid carbon and biodiversity benefit as well as diversifying farm income and providing new income streams and wood supply.

It will be vital that forestry professionals and representatives are involved in developing these multi-faceted land use models and developing advice for farmers and crofters, to ensure that new practitioners can take advantage of the skills and knowledge which ensure that new forests deliver the desired economic and environmental benefits.

Agriculture

In the proposals on agriculture we welcome:

- the new commitments to provide guidance for farmers and crofters to consider alternative land uses;
- the new policy proposal to explore options for land-use change to optimise uses beyond traditional farming to multi-faceted land use including forestry, peatland restoration and management and biomass production.
- The new policy proposal to help remove barriers for those on agricultural holdings, particularly in the tenanted sector, who want to engage in woodland creation.

It could be worth considering a low-carbon Farming Standard to form an integrated suite of guidance and a level playing field for climate-friendly land management alongside the UK Forestry Standard and proposed Peatland Restoration Standard.

Diet change

The committee might consider, along with ECCLR under their Behaviour Change remit, whether Scotland's guidelines for diets which are healthier and more climate-friendly should recommend reducing consumption of meat of all kinds, not just red meat. This would result in diets more suited to what Scotland can produce, including wild venison delivered through woodland management. It would also be in line with the latest Climate Change Committee [Sixth Carbon Budget](#) recommendations, which is to reduce consumption of all types of meat; and would be clearer to understand. Promoting a switch from red meat to chicken and pork is liable to increase demands on arable land which, under Climate Change Committee proposals, diet change should free up for crops such as Short Rotation Forestry.

Transport

Investment in EV infrastructure should be targeted at rural areas. Rural jobs such as forestry will always require significant amounts of site work, and long journeys for example to provide management oversight or specialist work to dispersed or remote sites.

The transition to online meetings in 2020 has highlighted the urgency of upgrading broadband connectivity to enable the rural economy to flourish, and the reduction in travel for work seen during Covid to be sustained.

Red diesel is not mentioned in the proposals and appears to fall between transport and industry. The decarbonisation of forestry and farming operations requires the development of alternatives to red diesel. The withdrawal of current tax benefits will simply interrupt the development of a sustainable timber sector. The forestry harvesting sector is made up of many SMEs and does not have the capability to deliver extensive R&D into low-carbon alternatives without government support.

The potential for Mossend International Railfreight Park (p.48) to facilitate timber haulage should be investigated, following the [Scottish Forestry timber rail trial](#) in 2020.

Local Government and Communities Committee

Remit includes: housing, buildings, fuel poverty.

Using wood products in insulation, such as wood fibre insulation, panelboard, batons, and window frames, creates a medium-term carbon store of material which, at end of life, can be used for bioenergy and the carbon captured for the long term (BECCS). Many of these products can themselves be made from recycled essential wood products, such as pallets and potato boxes, increasing their added value. This is in addition to the significant amounts of carbon which can be stored through the economy through the construction of new homes.

However, the current UK Greenhouse Gas inventory does not track the size of the carbon pool in buildings and other wood products.¹ There is, therefore, a risk that virgin fibre may be 'fast-tracked' into BECCS (which is measured), missing the value of this carbon store and leaving the construction

¹ Climate Change Committee, [Sixth Carbon Budget](#) Methodology Report p.329.

sector reliant on higher carbon materials or potentially expensive imports. While BECCS has exciting possibilities, it does not capture more carbon than would be stored by using the wood for another purpose first.

LGCC should work with EFWC (negative emissions technologies) and RECC (wood production) to explore the possibility of measuring this carbon pool in buildings, adding this to the list of metrics, and implementing policies to increase it by using more wood in all aspects of construction.

Buildings policy should also recognise carbon benefit to the waste stream of using a material which can ultimately be used for BECCS, instead of hard-to-recycle materials (see waste and circular economy, above).

The construction sector should look to Scottish manufacturing (in collaboration with [Construction Scotland Innovation Centre](#) and [Scottish Forest and Timber Technologies Industry Leadership Group](#)) to deliver the required materials. This should be added to the monitoring framework.

Buildings policy should link with forestry (RECC), energy and negative emissions policies (EFWC) to ensure the best whole-system carbon pathway for the use of wood.

Economy, Energy and Fair Work Committee

Remit includes: energy and electricity, industry, negative emissions technologies.

The Manufacturing Skills Academy should have strong links to [Construction Scotland Innovation Centre](#) and [Scottish Forest and Timber Technologies Industry Leadership Group](#).

The £180 million Energy Technologies Fund should support maximising timber use in the economy (eg panelboard, wood fibre insulation) and then BECCS at end of life.

The £34m Scottish Industrial Energy Transformation fund and £26m Low Carbon Manufacturing Challenge must drive genuinely sustainable solutions.

It might be more appropriate to illustrate the 'Industry' chapter of the updated plan with a low-carbon industry, rather than an oil platform.

Wood fibre: a whole-system approach

It is essential that proposals for bioenergy, industry and negative emissions technologies (NETs) making use of wood biomass, are developed in close conjunction with those for buildings (LGCC), forestry (REC), and waste (ECCLR).

Scotland has high potential to grow timber. However, although a renewable resource it is a limited one, especially in the short term, and it must be used to the best advantage for green recovery and decarbonisation. The UK is already heavily reliant on imported wood products, and is indeed the second biggest net importer of wood products in the world after China.² Global demand for wood is

² Forestry Statistics.

forecast to treble by 2050.³ Unless domestic supply and use are better aligned, Scotland's decarbonisation plans risk being disrupted by the global price of wood, and strong market demand from England. Plans for wood use must begin with a forecast of wood availability.

There is also a danger that, because Greenhouse Gas Removals from BECCS is clearly measured while wood in use (even if it is ultimately recycled into BECCS) is not, that virgin fibre will be fast-tracked into BECCS. This misses the opportunity to provide additional decarbonisation by replacing carbon-emitting or hard-to-recycle alternative materials such as concrete and plastic.

The carbon benefits of using wood stack up through the supply chain:

- During manufacture in the forest, carbon is captured through photosynthesis, and carbon stored in growing trees.
- Finished timber products are relatively low-energy to manufacture and lighter to transport and build with compared with alternative materials such as steel and concrete.
- Wood in use is a medium-term carbon store which is available immediately, while other NETs are still in development.
- Wood is easily recycled, for example essential but low-added-value products such as pallets are recycled into panelboard for use in construction, which at end of life can be used as biomass fuel. This both extends its carbon store in the economy, and means it provides carbon benefit by displacing other hard-to-recycle products such as plastic and concrete from the waste stream.
- At end of life, recycled wood used in BECCS will provide low-carbon energy and keep the carbon that it first captured in the forest captured for the long term. By this time, several more generations of trees will have grown in the place where it grew, capturing more carbon and increasing economic benefit.

Omitting any of these steps from the process – in particular, failing to make full use of wood in the economy before extracting its energy potential – reduces the carbon benefit.

Industry strategy should work with and invest in [Construction Scotland Innovation Centre](#) and [Scottish Forest and Timber Technologies Industry Leadership Group](#) to explore the potential for substitution across the economy to more inherently low-carbon materials, rather than simply seeking to decarbonise sector by sector and use CCS to offset remaining emissions.

The current UK Greenhouse Gas inventory does not track the size of the carbon pool in buildings and other wood products. By conducting an inventory of this pool in Scotland, and by implementing policies to increase it, this pool can become a NET which grows as housing and infrastructure grows. BECCS holds exciting possibilities for permanent storage of forest carbon, but it cannot store *more* carbon than is already stored by the equivalent amount of wood in a growing tree, or a timber house. If the active carbon store of wood in the economy is not also measured, there is a risk that much virgin fibre (including chipwood) which could have been used for construction will be fast-

³ OECD Global Material Resources Outlook

tracked into BECCS, wasting its economic opportunity and resulting in a reliance on higher-carbon materials such as concrete, steel and plastic.

The policy developed to provide market-benefit for Scottish industries that invest to decarbonise production must not provide market disbenefit for inherently low-carbon competitors. For example, in a construction project, using ‘low carbon concrete’ may still deliver significantly less climate benefit than wood.

Linkages between sectors are vital. For example, groups such as the Grangemouth Future Industry Board should be liaising with the Scottish Forest and Timber Technologies Industry Leadership Group to develop proposals, infrastructure and supply chains for a Scottish biorefining industry.

The carbon benefit of Scotland exporting wood products, including to England, to create a carbon store in buildings, should also be measured and understood.

Green jobs

We welcome the proposals for a Green Jobs Fund to find businesses that provide low-carbon products. This should be linked with the need to recruit to the land use workforce, in particular delivering green jobs across the whole forestry and timber supply chain.