

# RESPONDING TO THE CONSULTATION

## Forestry Commission Scotland draft Climate Change Action Plan

Instructions for filling the form out electronically:

Where a yes/no question is asked on this form:

- Decide on your response
- Click on the box relevant to your response – the cursor will appear
- Type an 'X' in the box.

Where an open question is asked:

- Click on the empty space below the question – the cursor will appear
- Type your response
- The page will expand with the length of your response – use as much space as you need.

Personal details table:

- Click on the blank box beside the question – the cursor will appear
- Type your details
- The page will expand with the length of your response – use as much space as you need.

Once you have finished the form, save it and then send it attached to an email to us at: [fcs.climatechange@forestry.gsi.gov.uk](mailto:fcs.climatechange@forestry.gsi.gov.uk). Please return it no later than **6 June 2008**, and earlier if at all possible.

If filling out the form by hand:

Print out the form, complete it and send it to: Forestry Commission Scotland, Silvan House, 231 Corstorphine Road, Edinburgh EH12 7AT. Please return it no later than **6 June 2008**, and earlier if at all possible.



## Respondent Information Form

Name	Forestry Policy Group
Address	c/o Old Poltalloch Kilmartin Argyll
Postcode	PA31 8RQ
Daytime tel (optional)	01852 500366
E-mail address	Gordon.graystephens@scottishnativewood s.org.uk

**1. Are you responding:** (please place a cross in one box only)

a) as an individual  please go to Q2a/b and then Q4

b) on behalf of a group/organisation

please go to Q3 and then Q4

### ***Individuals***

**2a Do you agree to your response being made available to the public?** (at Forestry Commission Scotland, 231 Corstorphine Road and their website)

YES (go to 2b below)

NO, not at all (*We will treat your response as confidential*)

**2b Where confidentiality is not requested, we will make your response available to the public on the following basis** (please cross **one** of the following boxes)

YES, make my response, name and address all available

YES, make my response available, but not my name or address

YES, make my response and name available but not my address

### ***On behalf of Groups or Organisations***

3. **The name and address of your organisation will be made available to the public** (at Forestry Commission Scotland, 231 Corstorphine Road and their website). **Are you also content for your response to be made available?**

YES

NO (*We will treat your response as confidential*)

### ***Sharing Responses/Future Engagement***

4. **Are you content for Forestry Commission Scotland, or others in the Scottish Government to contact you again in the future about your consultation response?**

YES

NO

Please note that Forestry Commission Scotland is subject to the provisions of the Freedom of Information (Scotland) Act 2002 and the Environmental Information (Scotland) Regulations 2004 and would, therefore, have to consider any request made to it under the Act or the Regulations for information relating to responses made to this document.



# Response to the Consultation paper

## (Forestry Commission Scotland draft Climate Change Action Plan 2008- 2010)

### Forestry Commission Scotland Draft Climate Change Action Plan:

#### Forestry Policy Group Comments

*Draft 2 June*

#### General Comments

- FCS's recognition of the threat posed by climate change is supported, and the actions proposed are welcome. However there is scope for FCS to go further in some areas, treat the issue with more urgency, and become a leading supporter of zero-carbon Britain.
- The forthcoming FES Framework Strategic Plan provides an ideal opportunity to ensure that the NFE is used as a catalyst, and should be revisited in this light.
- Forestry has to plan for the long term; this is more difficult in the face of climate uncertainty. Greater diversity of species reduces future risk as our woodlands will be better able to adapt to climate change.

#### Comments on the text

#### Protecting and managing existing forests

##### Page 6

There are opportunities to transform remote conifer plantations into low intervention native woodlands.

##### Page 7      **Conserving forest carbon stocks**

*"As forests develop they tend to be net accumulators of carbon. Eventually, sometimes after several centuries, forests reach a steady state where emissions balance sequestration. Management interventions in forests alter this natural dynamic"*

This is the introductory text for this section, which seems to focus on old growth forests, however the rest of the section seems to focus more on the relatively short rotations which are more common in Scotland's plantations.

- We support the recognition that the Plan gives to the importance of LISS in conserving forest carbon stocks in plantation forestry.
- We encourage FCS to be bold in their support for LISS.
- The carbon & soil nutrient implications of removing brash & stumps, especially from steep slopes should be more fully considered

## Woodland creation

### Page 9 Carbon sequestration through woodland creation

*“High quality semi-natural habitats are important in their own right and woodland creation will not be appropriate within some designated areas”*

- This sentence is slightly ambiguous. Are only designated areas high quality semi natural habitats (surely not)? Is it not more likely that woodland creation will not be appropriate in many or even most designated areas?
- Early production of (and consultation on) the forthcoming FCS document on areas suitable for afforestation will help to clear ambiguities until such time as new Indicative Forestry Strategies are produced.

### Page 10 Establishment of energy crops

- The emphasis should be on CHP plants, rather than on electricity generation alone. The greater efficiencies of CHP will substantially increase the impact that Scotland’s limited biomass resource can make.
- Short rotation forestry, (or long rotation coppice) using hardwood species over a 10-15 year rotation has considerable potential to deliver biomass and a range of biodiversity and rural development benefits.

## Adapting to climate change

### Page 12 Countering woodland fragmentation

### Page 13 Promoting low impact woodland management in core networks

We support the importance given to build capacity to adapt, however the plan focuses on creating Forest Habitat Networks around “high quality core areas”, without paying sufficient attention to these core areas.

Frequently the core areas (even designated sites, which are only a percentage of these core areas) are still not in good condition.

- More resources should be devoted to ensuring that the “high quality core areas” are in robust condition, before focussing resources on woodland creation on network lines.
- Land use incentives will need to be aligned upwards to deliver this.
- Existing native woodland management and enhancement is about “protecting and managing existing forests”, and should be given a section under this heading.

### Page 13 Focus on the most vulnerable woodland types

While species assemblages in native woodlands will change and we will need to accept this process, it is important that as a first priority

- we target incentives to ensure that our native woodlands are maintained and enhanced so that they are in robust condition.

Thereafter we should facilitate the process through increased connectivity and by allowing a dynamic interface between wooded and open habitats.

**Page 14      Increase the contribution of plantation-origin woodlands**

- There should be a particular focus on woods which are Long Established Plantation Origin. These are the woods which are most likely to deliver the benefits that are sought
- FCS should be careful about the use of the phrase "old growth". In the document it appears as "old growth", old growth and old-growth, within 3 paragraphs. For most of the English speaking world old growth is the equivalent to ancient woodland.

**Page 16      Pests, diseases & weather threats**

It's clear that the effects of climate change (and of our responses to it) are very complex and inevitably will be incompletely understood, however, the urgency of the situation demands rapid action.

- FCS should be prepared take decisions based on "best available information" rather than taking an approach of not doing anything until there is absolute clarity over what the outcomes will be.
- FCS should encourage FR to focus on a well-resourced and nimble research effort, able to pick up any new issues as they arise and give timeous advice to inform rapid actions.

**Page 19      Silvicultural and forest operations**

- The plan should pay greater attention to the desirability of developing greater mixtures on second and third rotation plantation sites where spruce has been the mainstay.

**Page 20      Identify situations where climate change may affect choice of silvicultural system or practice.**

"Where exposure allows, lower impact silvicultural systems may become more appropriate where carbon conservation is a high priority"

- FCS should define where carbon conservation is not a high priority before including this statement in the final version of the document.

"Increased winter rainfall may affect the ability to undertake repeated stand management (such as thinning) on some soils due to reduced accessibility for machinery and increased risk of windthrow"

- Increased winter rainfall, coupled with an enhanced desire to minimise carbon release from soils, might also affect the ability to undertake clearfell operations in some situations.

**Page 22      Tackle slope instability issues in sensitive locations**

- This positive role for native woodland management and creation should be given more prominence.

**Page 22      Increase the contribution of woodland in mitigating riverbank erosion**

- We support the continued management and establishment of native woodlands as a key part of catchment scale land use planning.

## **Page 23     Establish the practical potential for forestry in flood risk management**

There are opportunities to promote the positive role of native woodland creation.

## **Page 26     Increase the use of timber**

*"4     Encouraging improvements to the quality of the growing stock. A series of projects will be carried out to improve the fitness-for-purpose of timber including encouraging growing quality broadleaves for the domestic hardwood sector."*

- FCS should undertake these measures in partnership with organisations such as BIHIP, BFT & SNW.
- More attention should be paid to the more durable softwoods, such as larch and Douglas Fir

## **Page 28     Reducing the forestry sector's carbon footprint**

- Other sections of this document have separate headings for each of the priorities. This would be helpful for this section as well.
- This section might also usefully address operational practices in the sector, particularly fuel use. Industry has become dependent on a red diesel "rebate" or subsidy. This subsidy will become ever less tenable as government becomes more serious about climate change.

## **Timber Transport**

*"As three quarters of the UK's wood requirements are met from imports, the use of home-grown timber represents a significant reduction in "timber miles", and hence the carbon footprint, required to supply our needs..."*

- FCS should be careful that it does not compare oranges with lemons. The document refers to "timber miles" for imported timber and "roundwood road transport miles" for domestic timber. Transport carbon footprints are not automatically reduced by reducing the distance travelled.
- Further, Scottish Government and FCS should be encouraged to first encourage us to reduce our needs as a first priority, rather than accepting this need as this sentence seems to.

*"...Nevertheless, with transport accounting for 20-50% of the cost of roundwood delivered to Scottish mills, it is a major factor affecting the profitability of the Scottish forest industries..."*

While acknowledging, and supporting the fact that climate change forestry should not become a sole driver for forestry policy, it would appear that, for timber transport, the carbon footprint has been rather too effectively absorbed into other concerns of the Scottish forest industry

*"Increase local use and processing of timber through implementation of the FCS Timber Development Programme, Biomass Action Plan and Renewable Heat Strategy"*

The Timber Development Programme includes one (of 59) tasks directly related to this action ("assist the small scale processing sector in their efforts to maximise the value from using sustainable timber"), and there

is nothing immediately apparent in the Biomass Action Plan that is not deliverable by greatly increased transport of timber. There is a concern that large scale electricity generation plants, supported by government finance, might have an undesirable impact on the local utilisation that this document (and this group) seeks to encourage.

## **Page 29 Forestry Commission Scotland Corporate activity**

*"Forestry Commission Scotland will "lead by example" in the way it manages its corporate management activities and by investigating and demonstrating opportunities for carbon footprint reduction in the management of the nfe"*

FC Executive Board paper EB42/07 (30 Oct 2007) suggests that FC in 2006 was *"still falling far short of meeting Government targets on sustainable operations in most areas, bar biodiversity and travel."* Further, the author states, *"The NAO Report on Energy Consumption and Carbon Emissions in Government Departments likewise makes gloomy reading for the Commission."*

- Does the above not apply to FCS, or has FCS turned this around sufficiently to allow FCS to take this lead?

*"Through participation in the FC Greenerways project establish a baseline carbon footprint for FCS and set appropriate targets to reduce that footprint."*

FC's Executive Board 13 Dec 2006 Greenerways Paper refers to *"Baseline Data Collection for 05/06 and ongoing monitoring across all areas including establishment of carbon footprint and the development and meaningful and realistic targets"* (for reduction). That was now 18 months ago, so perhaps the above action should be more advanced by now.

- FCS's conversion to biodiesel should be tempered by concerns over the sustainability of the fuel.

## **Page 30**

- The promotion of reduction of demand and waste should be emphasised
- FCS should be encouraged to work with voluntary organisations to increase the effectiveness of their awareness raising campaigns.