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Response to FCS “Discussion Paper on New Planting in Scotland”

Scottish Native Woods is Scotland’s own native woodland conservation charity. We promote, facilitate and deliver the appropriate management and expansion of existing native woodlands, involving over 7,300ha to date.

We welcome the consultation that FCS are carrying out on this subject. Given the proposed expansion of new planting, an agreed approach to this subject is very necessary.

We support woodland expansion on appropriate sites, however we believe that FCS should

- take a broader view of the benefits that new woodlands can provide
- alter the balance of woodland types proposed
- ensure that sufficient emphasis is placed on the quality of woodlands created
- take care that the drive to expand woodlands does not take resources and attention away from ensuring that our existing woodlands are sustainably managed.

Further information on the content of this response is available from gordon.graystephens@scottishnativewoods.org.uk

Detailed comments

Page 4 Background

We welcome the stated intention to increase public benefits through woodland expansion. However we believe that an undue emphasis on attempting to use woodland creation to counteract climate change and stimulate economic development will weaken the overall impact of woodland creation, and urge a return to the more

holistic approach which has been agreed by a wide range of forestry stakeholders.

Page 6 Green House Gases

A significant carbon sink

Planting trees can deliver many benefits, however the impact on green house gases is not clearcut. More consideration needs to be given to the point at which new planted trees start to absorb more greenhouse gas than was created during the planting procedure. Consideration of this would have an impact on the extent to which new woodlands will provide a “vital “breathing space””.

A sustainable alternative

Wood is only a sustainable alternative if it does not contribute to global deforestation. Given the international nature of the timber market, growing demand & the pressure on natural forests, it is almost impossible to decouple our use of timber from global deforestation. Far greater emphasis should be placed on reduced utilisation of resources.

We note the increasing use of timber in construction, and suggest that this should encourage an increase in planting of species that can be used for this purpose (against a perceived trend of reduced planting).

We understood that it was now acknowledged that short rotation coppice is unlikely to occur on any substantial scale in Scotland. Perhaps it should therefore be dropped from documents such as this.

Restoring lost habitats and adapting to climate change

More emphasis should be given to this section, especially the biodiversity benefits of existing semi natural woodlands, appropriately located new native woodlands, and the capacity of native woodlands to deliver ecosystem services.

Page 6 Underpinning a sustainable forest products industry

The paper switches to UK figures for this section. Scotland already has a disproportionate share of the plantations that produce wood based products. Use of a figure that gives Scotland’s production and consumption would be more revealing. We have a surplus of trees that produce a low grade wood product, and a shortage of trees that produce higher value wood products. Our new planting should reflect this.

On what basis is the statement made “every effort is made to ensure that these (imported timber) products come from

sustainably managed forests". This surely only applies to FSC products?

"The growth and development of Scotland's forest product industry is a major success story", however it is unfortunate that it is built on rather uncertain foundations: public subsidy and low energy prices. This is illustrated by the gloomy story ("Job axe poised in forestry and haulage slump") from Confor in the Press & Journal (9/7/8) in the month after the production of this document. At a more analytical level, Plimsol Publishing Analysis-Forestry & Services indicates that 101 of the top 377 companies in the market are in real danger of financial failure, despite relatively benign trading conditions during the study period. We should ensure that new planting relies on firmer foundations.

Published accounts of "Ronnie's bulge" show a peak in c2020, ie 12 years not 25 (eg FC "Forestry Statistics 2008"). Has this altered, and if not how will new planting help?

We find the above arguments rather weak reasons for expanding plantations with too narrow a focus. However we support the creation of new timber producing forests where these forests help to create more secure foundations for the future. This might well mean fewer hectares at higher cost.

Supporting rural development

44% of businesses are rurally-based, but 44% of the employment is not: there are opportunities to shift this balance, which this document should have explored. The potential is realisable in the short term, and this should be a priority.

We are glad that "*Focus is increasing on the benefits of processing and using wood resources near to source*", however this is not reflected in the primary means of delivery this focus, the recent FC Timber Development Programme, where only 1 task among 59 focuses on local production. FCS should take steps to address this gap between policy documents.

Providing community benefits

We support the benefits delivered to communities by woodlands, and encourage an increased emphasis on these benefits.

Enhancing urban areas and improving landscapes

Although beauty is in the eye of the beholder, forest creation was still not always making a positive contribution in the early 90s.

P10 Delivery of climate change mitigation benefits

Is the additional 1.2Mt/yr net of 0.5m?

P10 Delivery of economic and rural development benefits

The paper limits this to sustaining existing jobs, and growing the number of jobs associated with biomass. Scottish Government needs to make more of the opportunities that increasing production offers, and to address other issues posed by fossil fuel consumption & large scale distant processing plants. More localisation is required.

What sort of woodland?

Mixed woodlands

In our experience, almost all urban, community and farm woodland occupiers will opt for native woodlands when the case is made. The "desired Function" argument advanced here is weak and should not be pursued. There are plenty of rather sad woodlands of this nature around Scotland, and we should not encourage the creation of more.

Softwood production forests

The "growing emphasis on mixed species and different silvicultural systems" has yet to result in sufficient practical action.

We are very concerned that Scottish Government should not promote or encourage additional areas of plantations with too narrow a focus: we know that the legacy forestry that we have in Scotland is not particularly fit for future purposes, nor particularly robust in the face of existing global challenges. To encourage more of the same would be unfortunate.

Peats and high carbon soils

P14 "Research is underway to better understand the carbon dynamics of soils and woodland creation".

We would like to know when the results are due, and how they will feed into Woodland Expansion proposals.

Land use balance

P14 "The issue of land use balance is also relevant to the regional viability of agricultural and forestry sectors, particularly where raw material production is closely tied to market or processing infrastructure such as specialist contractors, auction marts, creameries or sawmills"

This might apply to dairies, and be an argument against planting in such areas. However it barely applies to existing forestry practices, and is not particularly relevant to this paper.

"The concept of regional clustering is being recognised as a model for the development of the bioenergy sector in Scotland... In a high

transport cost future, it is a model that is likely to become more widely applicable”

We support the planned work to examine these wider issues, and suggest that all grant aided new planting should be directed by this work.

Will land come forward for woodland expansion?

P16 We note the “sustained interest in creating woodlands for biodiversity, environmental and social benefits”. These multiple benefit woodlands are best delivered by appropriately located native woodlands. We would encourage Scottish Government to support this sustained interest, rather than paying too much attention to narrow sectoral interests.

Land use types for woodland creation

P18 The table showing “very indicative links between land use and woodland types” shows native woodlands as best placed on “shrub heath”. This approach continues the unfortunate silo view of native woodlands, and requires considerable revision before an appropriate approach to woodland expansion can be finalised. For example, semi woodlands have a major role to play in addressing flood management on better land.

Delivery mechanisms

Natural regeneration

P20 “Where there is a genuine likelihood of success, natural regeneration is a favoured method of woodland creation”

This downgrades natural regeneration from previous FCS policy, where it is **the** favoured method. If climate change is to be a major aim of forest expansion, then increased emphasis should be placed on natural regeneration, as the most carbon friendly method of establishing trees.

This requires a grant structure and Statutory Agency commitment to a long-term management approach which includes appropriate deer management.

P27 Figure 3: Links between woodland and Scottish Government Strategic Objectives

This does not seem to be a full representation

- 1 Unless climate change is addressed we will all be less wealthy, and the world will be less fair.
- 2 2 Environmental quality is also about fairness and wealth

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- 3 Community development through community woodlands also delivers greener, wealthier & fairer outcomes.