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Submitted to Future Grant Support for Forestry
Submitted on 2023-05-17 14:53:40

Ministerial Foreword - Forestry in Scotland is a sector that we can be justly proud of.

1 - Introduction and Rationale for Providing Grant Support for Forestry

1. Do you agree that grant support for forestry should continue to be improved and developed as a discrete scheme within the overall package of land support?

Yes

Please explain your answer in the text box.:

If anything the scheme should be more ambitious.
But grants should not support commercial conifer schemes which deliver tax free returns - annualised returns over the last 15 years have averaged 18.9% at one investment house, not including other tax benefits [source: Gresham House].
This money should be redirected to deliver an increased 50% minimum of continuous cover native/broadleaf on any site, together with max coup sizes for conifers.
It could also be redirected to enhance/expand existing ancient Atlantic rainforest & ancient woodlands. Or to deliver more continuous cover native/broadleaf schemes to offeset a reduced level of pure conifer.

2. Are there any changes that would allow for better complementarity between the forestry and agriculture funding options?

Yes

Please explain your answer in the text box.:

I am not an expert in this field but could some grants (forestry and agriculture) support a scheme that delivers 5% of land on all farms in Scotland (up to e.g. 30 hectares) delivering forestry schemes. These can be commercial or regeneration. Support to farmers i.e. cash to plant and maintain. Would share the distribution of delivery of Government targets, create biodiversity islands and corridors, could have a community element...

Could reduced stocking 'wood pasture' form a new grant delivering nature based solutions?

2 - Forests Delivering for Scotland's Climate Change Plan

3. How can the support package for forestry evolve to help tackle the climate emergency, to achieve net zero, and to ensure that our woodlands and forests are resilient to the future climate?

Please explain your answer in the text box.:

Natural sequestration must be prioritised as a major part of a Government solutions based strategy to address the carbon emergency. But the risks associated with commercial forestry providing part of the solution have not been assessed [source : Scottish Government FOI request]
- A significant risk to delivering natural carbon sequestration's contribution to net zero (and to the industry) is a continued focus on single species conifer. Greater diversity in species significantly helps offset risk of pest and disease. If Ips Typographus (already in southern England) or similar reaches Scotland at any point in the next 30 years the entire timber and carbon sequestration targets (as well as many pensions and investments) could be at significant risk.
- Do not plant on peat >10cm as the evidence is not strong to support positive climate benefit and the potential negative consequences might be significant. Until proven in favour of doing so use a precautionary principle. RSPB have shown that targets can still be met without the need to plant on peat. Instead plant more diverse forests across the whole of Scotland with each scheme properly assessed for its unique land, soil, habitat, etc. It is an industry preference to continue with the status quo as it 'makes life easy'. (Remember that if the policy changes è.g. greater diversity (min 50% continuous cover native/broadleaf) the industry has 30 years + to invest in new tech e.g. glulam.
Greater diversity and reduced clearfell can also help address flood, drought, wind throw, etc in many locations.

4. Private investment through natural capital and carbon schemes can make a valuable contribution to climate change. Do you agree that the grant support mechanism should have more flexibility to maximise the opportunities to blend private and public finance to support woodland creation,

Not sure

Please explain you answer in the text box.:

Probably. But it should not be allowed to be commoditised, greenwashed and abused as has been the case to date.

The taxpayer should not support commercial initiatives that do not materially deliver balance and benefit for biodiversity and community. These should form material considerations in the determination of applications. Simply changing the criteria to require a minimum 50% continuous cover native/broadleaf together with material community access, wealth building, recreational benefits. (Community engagement should not just be informing

the community of intentions but listening and incorporating community thinking in proposals from day one).

I am not a carbon expert but I think carbon will be more valuable than bitcoin within the next decade or so. Any benefits should be shared between landowner, community, developers and government in partnership. It should not be simply bought and invested in by those who have most. Think Norway oil savings account...

5. How could the current funding package be improved to stimulate woodland expansion and better management across a wide range of woodland types, including native and productive woodlands?

Please explain your answer in the text box.:

Be imaginative and brave and listen to all voices equally.
Amend minimum scheme requirements to include
- 50% mixed continuous cover on any scheme.
- Maximum coup sizes for single species with forest edges and mixed continuous cover between.
- no planting on peat >10cm (RSPB report shows targets can still be met)
- no taxpayer funding and a presumption against single species clearfell plantation.
- no funding of projects until they include a “local opportunities” element to their applications è.g. Jobs, apprenticeships, community. Police the delivery and if any company non compliant do not grant future projects.

6. Do you agree that it should be a requirement of grant support that woodlands are managed to ensure that they become more resilient to the impacts of climate change and pests and disease?

Yes

How can the grant scheme support this?:

Resilience should be a balance for biodiversity, climate, community, society and commerce, not just climate change and pest and disease.

The current FGS has too great a focus on single species confer focussed in a few regions. This very approach is at significant risk if a single pest or disease successfully attacks Sitka spruce.

More diversity in trees significantly reduces the risk.
- if a pests attacks one species others survive
- increasingly severe storms have a significant effect on single species plantations è.g. storm Arwen felled 4000 hectares of plantation. Evidence in Europe shows that storms and drought allow pests and diseases to take hold.

3 - Integrating Woodlands on Farms and Crofts

7. Which of the following measures would help reduce the barriers for crofters and farmers wanting to include woodland as part of their farming business? Please select all that apply.

Are there others not listed above?:

I have no specific expertise or knowledge in this area.

8. Establishing small woodlands can have higher costs. What specific mechanisms would better support small scale woodlands and woodland ownership?

Please explain your answer in the text box.:

Perhaps linking this to agricultural support schemes similar to previous set aside ?

4 - Forests Delivering for People and Communities

9. How can forestry grants better support an increase in easily accessible, sustainably managed woodlands in urban and peri-urban areas?

Please explain your answer in the text box.:

You could introduce a “10/20/30 acre challenge”. Every community in Scotland/Britain (adjacent communities could work together), working with schools, community centres, landowners etc design, plant, create and monitor a woodland balanced for biodiversity, climate and community. The school kids grow up learning about nature and their wood which they could study in multiple ways. The wood should have hides, all abilities walks, be diverse and also have potentially productive areas. Could link to a community allotment. Government funds regional experts to work with communities to deliver same. Double the size and work with industry too, with half of each wood commercially focussed. Then industry helps fund program.

It is not only about the grant, but also raising awareness and changing behaviours. We need to re-educate people so the are closer to and better appreciate nature.

Councils should be guided/required in not using pesticides and herbicides. In managing parks/hedges/verges for nature (every park/verge/hedge seen as a wildlife corridor).

Hefty fines for unnecessarily felling trees! Or those responsible lose their jobs ;o)

10. How can grant support for forestry better enable rural communities to realise greater benefits from woodland to support community wealth building?

Please explain your answer in the text box.:

Government and the Scottish Land Commission have guidelines with respect to community wealth building (and a further SOSE report is due imminently). But these are simply not being followed or put into practice. Nothing will change (because it incurs cost) until pressure is exerted.

Given the investment returns being made on commercial forestry (18.9%pa average over last 15 years -see elsewhere in this submission) this should be a developer cost NOT a taxpayer cost for commercial schemes.

This must then be reinforce and policed, with punitive penalties for non compliance.

11. How can the forest regulatory and grant processes evolve to provide greater opportunities for communities to be involved in the development of forestry proposals?

Please explain your answer in the text box.:

As noted above, the easiest way in the short term would be a requirement for the industry to consult and listen to communities. Government could require a greater level of involvement and inclusion in schemes for biodiversity and community. SF also needs to then police and regulate same, and be given the funding to do this. Non compliance should mean significant fines and loss of ability to submit future projects.

There are a few examples in the wind industry where landowner, community and developer have worked together more formally. Far from perfect but lessons could be learned. But all need to be more progressive in this regard.

Community buyouts struggle to compete against commercial interests. For greater community involvement the price of and/or access to land needs to change. Regional specialists could help communities in this regardd.

12. How can the forestry regulatory and grant processes evolve to ensure that there is greater transparency about proposals and the decisions that have been made on them?

Please explain your answer in the text box.:

Communities are not provided with the assessments or full details of applications/correspondence so cannot easily comment if they wish to. All documents should be on the public record and provided to all stakeholders (including communities). You should not have to go to regional Scottish Forestry offices to see the documentation and at the very least an Executive Summary and digital copy should be provided if asked for.

Consultation should include engagement then Act upon it in delivering the final scheme. Viewing a scheme is a town hall is not community consultation. It is more 'informing' the community of what you are doing. The industry is very poor at consultation (they are not alone in this). They are currently providing information rather than asking for input that informs decision making.

Given the speed of development greater control is needed in the process and this could be simply achieved. Government could introduce a simple legal requirement for commercial developers to formally consult with communities, including providing all design/assessments (as is required for renewables) at scoping. Communities would be given a period to respond è.g. 12 weeks and can ask for a meeting with the developer (in person, in a room and/or on site). In such a case the community would then have e.g. 8 weeks after the meeting to respond to the Regulator in writing. No full applications can be accepted until this has been done. The Regulator must respond in writing to all issues raised by the community, including reasons for their decision, as part of their assessment and determination of each application.

All information relating to an application should be on the public record and be sent to relevant communities, including all assessments and application information.

13. Forestry grants have been used to stimulate rural forestry businesses by providing support with capital costs. Do you agree that this has been an effective measure to stimulate rural business?

Not sure

a. How could this approach be used to support further forestry businesses?:

I have no relevant expertise in this area. But there is real scope for the industry to do far more to support local businesses. Whilst the industry may support 25,000 jobs (noted earlier) these are often displaced jobs rather than create new local jobs. There is evidence that a more diverse approach to forestry could deliver much greater local business benefits. Local apprenticeships, local saw mills, support industries that help deliver a more local circular economy.

A progressive partnership initiative would be that social housing, councils, industry and communities could identify the need for housing/commercial buildings over è.g. A 10 year period then stimulate a circular economy to deliver the solution e.g. local timber to local saw mill to local sustainable prefab house fabrication to construction of social housing. This could create a significant sustainable local industry.

b. How could this approach be used to support further skills development?:

Link the above to local training, education and apprenticeships.
Cursory examples from the industry of their doing this are 'shop window'. Little effort is made to protect, enhance and deliver for local communities in the current commercial model.

14. How could the FGS processes and rules be developed to encourage more companies and organisations to provide training positions within the forestry sector?

Please explain your answer in the text box.:

Possibly through a regional specialist adviser network (not centralised as the team needs to develop trust with local companies). The Galloway Glens Landscape Partnership in Dumfries and Galloway is an example where a social enterprise worked with a diverse range of local businesses to deliver multiple apprenticeships across the Galloway Glens (not just forestry). The scheme helped companies to understand the benefits of such schemes. It would be very straightforward to replicate this exemplar project across Scotland.

Government also needs to seriously promote apprenticeships as a valued career approach. Not all school children are suited to college education and many benefit from this form of learning. It also helps prevent a brain drain from rural area.

5 - Forests Delivering for Biodiversity and the Environment

15. The primary purpose of FGS is to encourage forestry expansion and sustainable forest management, of which a key benefit is the realisation of environmental benefits. How can future grant support better help to address biodiversity loss in Scotland including the regeneration and expansion of native woodlands?

Please explain your answer in the text box.:

1. Proper baseline assessment of conifer applications to assess what is there, including cumulative impact (with threshold limits of acceptability for single species schemes - or make schemes more diverse from day one).
2. Greater diversity in what is planted, with a maximum coup size for single species and e.g. 50% minimum continuous cover mixed native/broadleaf. More edges, wider planting and positive biodiversity management.
3. A significant increase in the protection and enhancement of existing native woodlands e.g.
Temperate rainforests. Designation, incentives to expand (with compatible woodland), deer management, etc. Expand and encourage community buy out so they become woodlands for the future.

16. Herbivore browsing and damage can have a significant impact on biodiversity loss and restrict regeneration. How could forestry grant support mechanisms evolve to ensure effective management of deer populations at:

Landscape scale?:

Make deer the "sustainable, healthy meat of Scotland".
Develop a long term initiative, including advertising of the benefits in a long campaign to change behaviours. Include
- health benefits
- habitat benefits
- biodiversity benefits
- economic benefits (local businesses)

Set up incentives to create a local scale small enterprise industry to deliver the product. Procedures to 'properly' cull, store and sell deer products locally with a target to reduce numbers to 'natural' levels that enable true regeneration within 10 years. Link to regenerative forestry. This could be done to support estates as well as other community and local enterprise initiatives. (E.g. Glenfeshie still does stalking of deer with stocking densities of 1-1.5 per hectare).

Small scale mixed land use?:

Link landscape scale initiatives like the above to localised delivery of the same so it is geared towards local enterprise. Culling by farmers, stalkers (or local hunting communities), with local storage facilities and local sales. You could even link it to 'sporting' activities so you link activities.

If you wish to make any other relevant comments, please do so in the text box below.

Please add your comments here.:

About you

What is your name?

Name:
[Redacted]

What is your email address?

Email:
[Redacted]

Are you responding as an individual or an organisation?

Individual

What is your organisation?

Organisation:

Scottish Forestry would like your permission to publish your response. Please indicate your publishing preference:

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We may share your response internally with other Scottish Forestry policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Forestry to contact you again in relation to this consultation exercise?

Yes

I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

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