

Community Woodlands Association response to Forestry Commission Scotland Discussion paper on Woodland Expansion

The Community Woodlands Association welcomes the opportunity to comment on the FCS Discussion Paper on Woodland Expansion for Scotland.

We support both the overall aspiration to increase Scotland's woodland cover to c. 25%, and the identification of various woodland creation priorities. We are pleased by the thorough exposition of the multiple benefits deliverable from forests (pp 4-8) and in particular the recognition of the role of Scotland's Community Woodland groups (p8) in delivering public benefits.

However we consider that the consultation paper would have been better founded if it had begun with a thorough assessment of the current forest resource, identifying its strengths and weaknesses, analysed whether the current resource was fit for purpose in the 21st century, and on the basis of this analysis, considered how forest expansion could contribute to strengthening the provision of benefits from the forest resource as a whole.

In particular, much of Scotland's forests are lacking in "quality": the legacy of previous woodland expansion has largely been low-grade softwood plantations, managed with minimal silviculture, servicing distant processors, whilst the native woodland resource has been fragmented and impoverished.

We argue that Scotland's forest resource is lacking in quality hardwood and softwoods, genuinely multi-functional woodland, and woodland that services local processing and markets - we trust that the proposed expansion will begin to address these issues.

We would like to comment on specific aspects of the paper.

Rate of woodland expansion

The discussion paper considers an expansion rate of c. 10,000 ha / year - at which rate it will take c. 65 years to reach 25% land cover (even assuming this is "net" – see below) – which is rather slower than the 25% by 2050 SFS aspiration.

Is it anticipated that the rate will increase, perhaps following CAP reform? Or is it expected that the "official" grant aided planting will be augmented by natural expansion? The paper should include a more explicit discussion of these questions.

Net or Gross?

The paper should make clear whether the figure of 10 kha/year for the woodland expansion programme is net or gross. It is recognised that legal deforestation is happening across Scotland for a number of reasons – development (roads, houses, windfarms), to restore open ground habitats, and as part on on-going restructuring and redesign of first rotation conifer monocultures.

The balance of afforestation and deforestation has a significant impact on the relative importance of the public benefits claimed for the woodland expansion programme. Whilst deforestation as part of restructuring or open ground restoration may deliver public benefits which are complementary to some of those obtained from woodland expansion – e.g. recreation, biodiversity, when it comes to carbon sequestration it is the net figure that matters. If the “woodland expansion” figure is gross, and there is a corresponding loss of forest cover happening elsewhere, for whatever reason, then sequestration claims will be perceived as bogus.

Balance of Woodland Types

The paper suggests a 60/40 balance: the annual creation of c. 6,000ha of softwood production and energy forests and c. 4,000ha of semi-natural and mixed woods. We anticipate that you will receive considerable comment on this point from various sides – but we understand the rationale for this balance.

Is it anticipated that these figures will be complemented by extensive un-grant-aided recolonisation by native woodland? Certainly any meaningful attempts at sustainable deer management or relating agricultural subsidies to the purchase of public benefits would have a profound effect on Scotland’s level of woodland cover.

The discussion of natural regeneration on p20 seems unduly negative in tone. We would argue that natural regeneration of native species should be encouraged wherever possible.

Quantity vs Quality

Inevitably our aspirations and targets for woodland expansion are couched in measures of quantity, however, it must be reiterated that if (as we believe it should be) the primary focus is on delivery of public benefits, then the key is quality, rather than quantity.

It is particularly important that the new softwood production forests “have substantial areas of open space, areas of native species and an emphasis on use of mixed species and different silvicultural systems, to increase diversity and robustness in the face of climate change” (p11), and monitoring and evaluation mechanisms must include indicators of diversity and quality (e.g. % thinnable / CCF).

Sitka spruce and upland birch will no doubt be important components of woodland expansion, but a 10kha/year afforestation programme comprising 60% upland sitka, 40% upland birchwood will not be seen to deliver the desired level of public benefits.

Balance between land types to be afforested

We support the indicative balance between land types to be afforested (p18), which seems to represent a reasonable chance of achieving aspirations to deliver forestry on better ground. This will enable a “virtuous circle” : better ground conditions give wider options to deliver wider objectives, producing more attractive forests which

are closer to people and can be managed more intensively by e.g. thinning to grow better timber and produce more income to support more management...

However, in the second table, the double tick for native woodland in the "Shrub heath" could be read as suggesting native woodlands are best placed there. This approach continues to perpetuate an unfortunate "ghetto-ised" view of native woodlands, as being solely for nature conservation; when they are capable of producing much wider benefits

Land Release Issues

Land Release is rightly identified as central to expansion, and is as p16 notes, influenced by a range of key factors. Some of those listed have already been overtaken by events however: e.g. short-term price fluctuations for cereals, timber, and may not be worth including. Longer term price increases in agricultural inputs – fertilisers, diesel, etc may have a more significant effect on agricultural "economics"

As noted on p17, the decoupling of the CAP subsidy regime should eventually reduce some of the fiscal disincentives to woodland creation, although the weaning of the agricultural sector from production subsidies has proved agonisingly slow. However, tipping points do appear to have been reached in the N & W Highlands & Western Isles, with an on-going rapid reduction in stock numbers and potential (limited often only by seed source) for natural recolonisation on a significant scale.

Food Security

The paper seeks to "emphasise that forestry cannot be considered in isolation from other land uses and issues like food and energy security". We agree, however, we consider that much of what is written re food security is hype, and represents a concerted and deliberate attempt by agricultural interests to defend current subsidy levels and to distract attention from the environmental impact of current agricultural and food processing & distribution practice. We would note the following:

- Given the GB climate (present and anticipated) we will inevitably be dependent on imports for certain staples, from bananas to coffee
- At a GB level we already produce almost as much as we consume (as opposed to what we buy and throw away)
- Our agricultural land use is very inefficient (having been distorted by years of intervention) both in terms of output and land utilization.

The paper should stress that the proposed woodland expansion will have minimal impact on present or likely future food production. In the terms of the land classification employed by the paper, it is clear that the vast majority of the scrub heath land type has no prospect of delivering any meaningful volume of food. Likewise the viable, economic contribution of the semi-natural grassland/bracken land fraction to national food production is minimal, and even the permanent improved grassland area is currently underutilized, significant areas growing rushes in the north and west, and providing grazing for ponies in a belt around our cities.

Land use policy

Another significant policy area is in relation to open ground habitats, in which Scotland, thanks to its long history of deforestation, is overly blessed. Some of these habitats – e.g. machair and montane types, are relatively limited, others, notably blanket bog, have particular sensitivities, and none of these are appropriate for afforestation.

However, much of what passes for “semi-natural” open ground is anthropogenic, degraded and of low biodiversity value, artificially maintained in successional juvenility to support unsustainable numbers of single species. Woodland expansion will inevitably be at the expense of some presently “open ground” – but it need to be stated that in most cases this is simply re-afforestation of land that would naturally be forested.

Conclusion – The Land Use Debate

The introduction alludes to a developing debate on wider land use policy. We believe that FCS should take a robust stance, supported by this paper, in the discussions ahead, stressing the wide public benefits of and public support for, woodland expansion.