

Review of The Scottish Forestry Strategy

Response of the Community Woodlands Association, 15 September 2005

The Community Woodlands Association welcomes the opportunity to comment on the Review of the Scottish Forestry Strategy.

Our response is in two parts: the second attempts to provide answers to the 22 questions posed in the consultation document. Many of these answers are inter-linked, most are variations on common themes: community, diversity, quality, which we believe are central to the future development of Scottish Forestry. Firstly, though, we have some general comments regarding the international environmental and economic context within which Scottish forestry must operate, and on the presentation and prioritisation of Strategic Directions and Priorities for Action.

International Context

The consultation document presents an overview of the evolving international policy context on Biodiversity, Sustainable Development, etc, and rightly sees climate change as one of the key issues (discussed further in our answer to Q9), however, it omits consideration of the implications of the end of the era of cheap oil (and by extension, of cheap energy).

These developments will, we believe, have far-reaching implications for forestry in Scotland. They present both a threat (because current forest harvesting and timber transport is heavily oil dependent) and an opportunity e.g. for development of woodfuel markets. The two natural hedges against spiralling transport costs are improved timber quality, and local processing and utilisation. The social and environmental benefits of these have been well-rehearsed over the last decade, it is vital now that the revised SFS recognises their economic necessity, and aggressively promotes their development

Presentation and Prioritisation

The SFS is the flagship document for Scottish Forestry, and as such, it is at least as important “externally” as “internally” and needs to speak to, and sell the public benefits of forestry to, the nation.

The key weakness of the 2000 SFS is not so much that it says the wrong things, but that it says most of the right things in the wrong order. Rightly or wrongly, readers will infer an order of priority from the list of strategic directions, so leading with timber production given Scotland’s current resource and the on-going global market conditions, is, to put it mildly, brave.

We believe that the revised SFS should “lead” with social and environmental benefits – these are areas where Scottish forestry has made great steps in the past decade, and where there is still great potential for improvement and enhanced contribution. Moreover, these are the areas which engage with the general public, and are most likely to attract and justify enhanced public funding. (It is interesting to note that this was recognised, subconsciously at least, in the images chosen to illustrate the existing SFS)

We present below an attempt to reword and restructure the Vision, Strategic Directions and Priorities for Action to place public benefits at the top of the agenda. Naturally, it should be understood that there is a great deal of linkage and interdependence between priorities and across strategic directions.

Vision

“Scotland will be renowned as a land of fine trees, woods and forests that sustain communities, provide social benefits locally and nationally, support thriving wood-based industries and contribute to a better quality environment for all.”

Strategic Directions & Priorities for Action

Woodlands For People

- Provide recreation opportunities & promote health through access
- Enhance contribution to tourism from high quality forests
- Support community ownership/management
- Increase opportunities for community consultation, involvement & engagement
- Develop and support Forest Education Initiatives
- Create wider employment opportunities

Woodlands For A Healthy Environment

- Conserve and enhance woodland biodiversity
- Expand and enhance native woodlands
- Help mitigate climate change
- Improve contribution to soil and water quality
- Enhance landscapes

Quality Woodland Management

- Improve timber quality
- Develop and implement alternatives to clearfell
- Expand woodlands using sites and species appropriate to objectives
- Develop non-timber outputs and benefits
- Integrated land management, including reducing deer numbers

Successful Forest Industries

- Develop and support local processing and utilisation
- Support wood-based biomass energy development
- Develop and support forest industries
- Product and market development
- Targeted improvement of transport infrastructure

Responses to specific questions

1	What do you think are the best things to have happened in forestry since 2000?
	<p>The development of community engagement and involvement at a range of scales and levels is in our view the best thing to have happened in forestry since 2000.</p> <p>Community ownership and management of woodlands has grown rapidly in the period, a trend which can only be accelerated by the recently launched National Forest Land Scheme. The growth and dynamism of the community woodland sector is reflected in the establishment of the Community Woodlands Association as the representative body for the sector.</p> <p>Furthermore, there has been growing recognition of the importance of securing community benefits from all forestry. The national approach to delivery of social benefits needs to be informed by best practice from the districts, and underwritten by a clear and practical understanding of what these benefits are and how to achieve them. Good practice is still in many cases dependent on good practitioners within FCS & FES, rather than the general rule. More needs to be done to encourage the private sector to deliver wider social benefits – again, practice is very variable.</p> <p>We note a number of other positive developments in the past five years:</p> <ul style="list-style-type: none"> • The introduction of the Scottish Forestry Grant Scheme, particularly the enhanced support for management (“stewardship”), although the overall “pot” is too small. • There have been some very good environmental and tourism projects in the public (Sunart, 7 Stanes, Tweed Forest Park) and community (Laggan, Abriachan, Culag) sectors, and occasionally in the wider private sector (Falls of Shin). • There has been increasing recognition of regional priorities for forestry, and the beginnings of a move from top-down, “one size fits all” prescriptions. • Progress is also beginning to be made on market diversification, e.g. timber housing & biomass, though much more needs to be done.
2	Has the Forestry Strategy failed to deliver anything important?
	<p>Writing and reviewing strategies can be done in a matter of months, whereas creating and managing a sustainable forest resource takes decades, so understandably there are a number of areas in which the vision of the SFS has not been fully implemented. This notwithstanding, there has not been enough progress on improving the quality of our forests; this lack of quality impacts long-term economic out-turns, but also limits social and environmental benefits.</p> <ul style="list-style-type: none"> • There is still too much “lowest common denominator” forestry, and a continued failure to implement alternatives to clearfell, which are being delayed until the next rotation. • Progress has been slower than desired in other areas, e.g. expansion and restoration of riparian and tree-line woods. • There is a lack of protection for Ancient Semi-Natural Woodlands, particularly at local plan level, and ASNW are still lost to or threatened by development.
3	Is the broad content of the current Forestry Strategy still relevant and appropriate?
4	Are any changes now required to the Forestry Strategy’s Vision, Guiding

	Principles and Strategic Directions? If so what are they?
5	Should any of the existing Priorities for Action be dropped? If so, which ones?
6	Should there be any new Priorities for Action? If so, what should they be?
	see General Comments above
7	Is an appropriate balance being achieved between the economic, environmental and social aspects of forestry? If not, please give specific examples.
	<p>Taking the question at face value, our simplistic answer is that an appropriate balance is not yet being achieved, but things are moving in the right direction.</p> <p>However, we object to the phrasing of the question, which sets up false oppositions between economic, environmental and social objectives.</p> <p>We believe the SFS should champion the development of a sustainable forest resource delivering greater economic, environmental <u>and</u> social benefits, and recognise that these aspects are inter-related and mutually dependent, rather than seek a contrived balance between competing aspects.</p> <p>Today, too many of Scotland's forests are unmanaged spruce and lodgepole pine monocultures which deliver equally low economic, environmental and social benefits – balanced, but hardly desirable. Exotic conifer plantations can never rival the environmental benefits of ancient semi-natural woodland, but a species-diverse plantation forest managed for timber quality will produce greater social and environmental benefits than a no-silviculture monoculture.</p> <p>A particular problem with the current presentation of the economic-environmental-social trinity is employment of a narrow, short-term definition of “economic” benefits, which almost always conflicts with (and therefore impedes delivery of) social and environmental objectives. The SFS needs to take a longer term, and more holistic approach which assesses a wider view of “economic”.</p>
8	Do you agree that the Scottish Forestry Strategy should be focussed primarily on increasing the benefits of forestry to the people of Scotland?
	<p>YES!</p> <p>But this should not be understood as meaning the people of Scotland at the expense of the rest of the world, nor at the expense of Scotland's wildlife.</p>
9	Should woodlands play a greater role in helping Scotland deal with climate change? If so, how?
	<p>Yes.</p> <p>The examples given are good (biomass energy, sustainable construction, sequestration), but the desire to mitigate climate change should NOT lead to unrestrained afforestation.</p> <p>Better management (ATC, improving timber quality) will have significant impact on carbon budgets of forests and forest soils, and increased local processing and utilisation will improve forestry's carbon budget.</p>

	<p>We consider that enhancing habitat networks & managing flood risk through riparian woods are worth doing regardless of climate change issues.</p> <p>We note also that climate change has other implications for forestry, and in particular may demand a reassessment of the geographic limits of certain native species.</p>
10	<p>What should be the role of forestry in sustainable rural development?</p>
	<p>We believe that forestry should play a major role in sustaining healthy and vibrant rural communities. Employment provision is critical, both directly, through forestry work and processing, and indirectly, through, e.g. contribution to tourism.</p> <p>Forestry is already an important employer, however it needs to create more permanent and local jobs. Annual employment turnover of >30%, and nearly 50% of contract workers travelling more than 20 miles to work, are not indicative of a sustainable industry.</p> <p>In the long-term, forestry has a much a greater role in supporting indirect employment: jobs in recreation, tourism, health and education, based around and at least partly dependent on the woodland resource</p> <p>A key element of sustainable rural development is local control and management of their resources – local communities making decisions about their own development, rather than rural development being part of a checklist of centralised objectives.</p>
11	<p>How could forestry become more of an exemplar of sustainable development in Scotland?</p>
	<p>We believe that forestry has great potential to be an exemplar of sustainable development: in addition to delivering a wide range of public benefits and integration of social, environmental and economic, it has a natural long-term time horizon – the trees we plant today will (or should, if we plant the right species in the right places) be of (multiple) value for our children and our children’s children.</p> <p>The major obstacle to achieving this status is the tyranny of short-term cash-flow economics.</p> <p>See also comments on local control and management above</p>
12	<p>How should Scotland respond to the opportunities presented by the increasing supply of timber from Scotland’s woodlands?</p>
	<p>The projected increase of timber supply could present significant opportunities, however, the revised Strategy needs to recognise that a) much of this timber will be low grade and is very distant from present processing capacity, b) much is in hands of private sector and unless markets are available, may never be harvested.</p> <p>Local processing and use, particularly in biomass sector, needs be a major market for projected supply increase, particularly given spiralling transport costs.</p> <p>More strategically, it should be recognised that if this material comes to market, it may be a one-off pulse in production, some sites will not be restocked, others converted to native broadleaves. Future timber growing should be concentrated on better sites, producing better quality material, from a much wider range of species: Douglas Fir, European Larch, Western Red Cedar, and Broadleaves.</p>

13	How could the overall economic potential of Scotland’s woodlands be increased?
	<p>First and foremost by focus on management for quality and recognition that diverse and high-quality forests are most likely to deliver a wide range of economic (and social/environmental) benefits.</p> <p>Secondly, the historic focus on the industrial scale has missed many opportunities at small and medium scales, which more local control and management can find and develop.</p> <p>Thirdly, by recognising the economic halo effect of forestry on tourism, housing values, quality of life – which may often be greater than the timber value.</p>
14	Should the private and public forestry sectors engage further in social issues such as deprivation, health, equality and disability? If so, how? Where is this a high priority in Scotland?
	<p>Yes, but the engagement needs the recognition that Forestry, with its (relatively) tiny budget, is unlikely to succeed without significantly enhanced resources and genuine partnerships with the social work & health departments.</p> <p>Forestry’s greatest successes to date have been its role in providing an arena for community development and engagement, and in releasing the innovation and imagination of communities.</p> <p>Future engagement should play to this strength, allied to a continued expansion of opportunities for communities to take meaningful decisions about their environment, especially in urban and peri-urban areas.</p>
15	Has there been sufficient focus on the contribution of woodlands to the enhancement of our natural heritage? If not, what more needs to be done?
	<p>The potential contribution of Scotland’s woodlands to the natural heritage is huge. Thinking and practice are moving in the right direction but the diversification and restoration work required is inevitably a long term process.</p> <p>Much more needs to be done to meet HAP expansion targets, and in particular there is a large undeveloped potential for restoration of riparian and tree-line woodland.</p> <p>The development of the Forest Habitat Networks concept is positive step – however it is important that the concept is employed flexibly and positively (i.e. seen as a driver for woodland expansion) rather than negatively (i.e. using the perceived absence of a functioning FHN as a constraint)</p>
16	Has there been sufficient focus on the contribution of woodlands to the enhancement of our cultural heritage? If not, what more needs to be done?
	<p>There has to date been a strong focus on preservation of “historic” culture (Scheduled Ancient Monuments, etc), we believe that there needs to be more development of contribution to “living” culture – woodlands as arenas for living, working and playing.</p>

	<p>We believe that community ownership, management and involvement are key elements of developing a living woodland culture embracing education, heritage and the arts, which in turn is a vital component of a sustainable community. Pioneering work has been done by individual community woodland groups, but Scotland-wide we are only scratching the surface of an immense potential.</p>
<p>17</p>	<p>How can the forestry sector be better integrated with other land uses?</p>
	<p>The desirability of greater integration with other landuses has long been a theme of forestry strategies and policies – unfortunately this desire has rarely been reciprocated in the strategies and policies of other landuse sectors, most notably agriculture. The first step, therefore is to have a recognition of the need for greater integration from all sectors.</p> <p>The consultation document notes the recognition that public money will only be forthcoming if it results in the full range of social, environmental and economic benefits to society – we believe that this principle should be extended to all land-uses, and that doing so would lead to a better balance of support for forestry vis-à-vis agriculture.</p> <p>There should be a greater and wider recognition that the current balance of forestry and open ground is in many areas not a “natural” balance - there are some areas where inappropriate forestry should be removed (as in happening on the Caithness and Sutherland peatlands) and many others where native woodland restoration is an urgent priority.</p> <p>Unsustainable deer numbers remain a critical issue in many areas of the Highlands, and severely impinge on delivery of native woodland restoration and functioning Forest Habitat Networks. The SFS should argue in the strongest possible terms for enhanced powers to control deer, and enhanced assistance for those willing to do so.</p>
<p>18</p>	<p>How should we determine the appropriate extent and distribution of woodland in Scotland? How much woodland do we need? What type of woodland do we need? Where do we need it?</p>
	<p>If it were possible to remove humanity and our domestic beasts (including deer) from Scotland, then it is certain that in a few centuries the major part of the land would be forested. The reality is that it takes significant human effort and considerable public funding to maintain most of Scotland as non-natural, non-forested land. Perhaps, therefore, the question should be turned on its head – “how much non-woodland do we need?”</p> <p>We agree with the consultation document that woodland expansion must be seen as a means to an end (i.e. to deliver social, environmental and economic objectives), not as an end in itself. In the “short” term, the 25% Woodland Cover by mid-century “aspiration” should be retained. The five SFGS Woodland Expansion objectives (well designed productive forest, native woodland, riparian habitat, urban/post industrial & farmed/crafting landscape) provide a reasonable framework for guiding future afforestation; of these five, we believe expansion of native woodland should account for the greatest hectarage, though we recognise that regional and local priorities are likely to differ.</p> <p>As a crude rule of thumb, we suggest that the <u>net</u> woodland expansion should be of native woodland (with the understanding that as noted above, climate change requires a reassessment of the limits on geographic distribution of certain native species). Restoration of riparian and tree-line woodlands should be a particular focus.</p>

	<p>Woodland expansion for timber production on suitable sites should continue, but with two caveats:</p> <ul style="list-style-type: none"> • a much greater diversity of species should be employed, including broadleaves as well as a wider range of conifers, and that management for timber quality rather than quantity should be a prerequisite. • expansion for timber production should be balanced by corresponding reductions elsewhere, e.g. by permanent deforestation and return to open ground, as is happening on peatland sites, through restoration of PAWS sites, and by conversion of currently marginal sites to broadleaves during restructuring.
19	Should regional priorities be reflected in the revised Strategy? If so, how?
	<p>As indicated previously, we believe that the recognition of the importance of regional priorities for forestry over the last few years to be a positive development, and hope that such priorities will be developed further, e.g. through Regional Forestry Fora.</p> <p>However, the revised SFS should not itself attempt to address the <u>specifics</u> of these regional priorities, but rather, should set a national context which “leaves space” for regional priorities to be developed regionally (and locally) and allows regional and local diversity to evolve naturally from below.</p> <p>The SFS should also recognise that “regions” (usually taken as = FCS Conservancies) are not homogeneous – e.g. there is probably greater variation of needs and opportunities within Highland Conservancy (e.g. between Western Isles and Inverness) than there is between conservancies, and that local priorities should also be expressed.</p>
20	Is the balance of support mechanisms for forestry about right? If not, how should it change?
	<p>There is currently a reasonable menu of support mechanisms and a wide range of funding sources, though they are not always “joined up”, but the overall pot (particularly for SFGS) does not accurately reflect the scale of public benefits, especially when considered vis-a-vis agriculture (see response to Q17).</p> <p>We also have some concern over the future configuration of support mechanisms, particularly with respect to EU Rural Development Regulations.</p>
21	Could forestry incentives be better focussed on key priorities? If so, how?
	<p>Focussing funding on key priorities runs two risks: you try to fund yesterday’s priorities tomorrow, and you lose flexibility to meet new challenges.</p>
22	Additional comments?
	<p>There are a number of desirable initiatives which are prevented or limited by the Forestry Act. (e.g., the scope of leasing arrangements under the NFLS). We recognise that it is probably beyond the scope of the SFS Review, however, we suggest that the implementation and delivery of the SFS would be well served by the replacement of the Forestry Act with a new Scottish Forestry Act designed for the 21st century, rather than the 1960s</p>