

Scotland's Forestry Strategy 2019-2029

Response by the Community Woodlands Association

The Community Woodlands Association (CWA) welcomes the opportunity on behalf of its membership to respond to the consultation draft of Scotland's Forestry Strategy 2019-2029. CWA is a membership organisation which supports, represents and promotes Scotland's 200+ community woodland groups.

Community forestry

We are very pleased to see that the draft strategy recognises the scale and achievement of community forestry, e.g. p13 "Since 2003, 200 community woodland groups have been established (*note: this is incorrect, there are >200 groups but many were established before 2003*), collectively managing around 100,000 ha of forests and woodlands and other land. Part of the reason for the growth in community woodland groups is a recognition that Scotland's forests and woodlands can play an important role in galvanising and empowering communities: they can provide opportunities for the development of community-based enterprises and, through ownership and participation in management, can foster community cohesion and help people feel they have control over the decisions that shape their lives and the environment in which they live."

However there is a tendency to focus on community forestry as a vehicle for community empowerment, rather than as an effective delivery mechanism, in forestry terms, for a range of social, economic and environmental outcomes; e.g. p28 "Through ownership and direct management of forests and woodlands, as well as through other forms of involvement in forest and woodland management decision-making processes, communities can build a sense of identity and pride and be empowered to become more resilient and have more control over their own lives and their local environment."

Likewise, one of the ten priorities is "5. Increase community ownership and management of forests and woodlands" – this does get a tick in the "economic" box as well as "social" but the rationale given is "Supports the principles of the SG's Land Rights and Responsibilities Statement (2017) and helps deliver the SG's target of having 1 million acres of land in community ownership by 2020" rather than the public benefit delivery that flows from community ownership and which is the motivation for community involvement in the first place. As the Scottish Land Commission noted in their Recommendations to Scottish Ministers on Community Ownership and Community Right to Buy¹, community ownership "is not an end in itself but a means to delivering wider development and regeneration outcomes".

We would also note that there are substantial opportunities for community engagement and public benefit delivery from partnership working, i.e. through management agreements with public and private sector landowners.

The strategy should recognise that community forestry is embedded in the main stream of Scottish forestry and is a key vehicle for delivering local economic development and a range of education, health and well-being initiatives; it must not be seen as peripheral or an add-on. A great deal has been achieved in the last 10 years, but much more can be done and Scotland's Forestry Strategy has an important role driving this forward.

¹ <https://landcommission.gov.scot/wp-content/uploads/2018/11/Community-Ownership-Report-SLC-Recommendations-to-Ministers.pdf>

There are however many challenges for community woodland groups, particularly new and emerging ones and it is important that there is support and advice available. This can be delivered in a number of ways, including through organisations such as the CWA and also by ensuring community engagement and wider associated skills are seen as part of the necessary skill set of forest managers. Such skills should be well reflected in college and university forestry courses and feature in Continuing Professional Development programmes.

Implementation and delivery

Whilst we understand the intention for this strategy to be a “higher level” than previous iterations we are concerned at the lack of clarity over aspects of implementation and delivery, particularly with respect to the allocation of resources. In the absence of an implementation plan or any indication of resource allocations we have significant concerns about the extent to which the broad vision of the strategy will be resourced and delivered.

In addition to providing an outline implementation plan, we consider that an advisory group of stakeholders should be established, covering the full range of interests and activity detailed in the strategy, to provide independent advice to the Scottish Government on the implementation and delivery of the strategy.

We recognise that the views of stakeholders have been actively sought through a considerable number of events and meetings during the current consultation process. However our woods and forest impact on the lives of a much wider proportion of Scotland’s population in a variety of ways: as recreational users, as “customers” of ecosystem services or as taxpayers called upon to fund woodland expansion and other activities.

We understand that the Scottish Government’s Rural and Environment Science and Analytical Services (RESAS) is undertaking research, consisting of interviews with members of the public, a national survey and citizens’ assemblies, to better understand the public needs and expectations from the future agriculture support in Scotland, to help outline and define the future priorities for agriculture. Whilst it is too late to carry out such a process to inform this strategy it would be a valuable exercise to help inform the implementation, delivery and resourcing of the strategy.

Policies for delivery (Section 5.2 – no specific question relates directly to this section)

Incentives and Regulation There is an understandable focus on the forestry budget (especially SRDP) in this section but the strategy must recognise that forestry grants do not operate in a vacuum and acknowledge that agricultural subsidy has significant and often negative impacts on forestry e.g. on land release for woodland creation.

The statement that “Future incentives will be determined in the context of wider support for land use, following the UK’s exit from the EU” is weak – it would be preferable if there was a Scottish Government commitment to align future incentives to delivery of land use strategy / SFS, given that most of the land available for future woodland expansion will come from unimproved marginal agricultural grazing land. With appropriate alignment, this could be done in a way which both supports woodland expansion and re-structuring of agricultural holdings.

This section should also recognise the impact of other funding on the sector, e.g. the Scottish Land Fund for community acquisition, the National Lottery for development projects in woodlands and the very significant state funding for timber processors (e.g. £12m for Norbord from HIE).

We are pleased to see the final line in this section which notes the importance of fiscal incentives, this would benefit from a more detailed analysis of their impact (e.g. in inhibiting land release for woodland creation and community acquisition). Not all aspects of the fiscal regime are devolved, however this should not inhibit the Scottish Government from committing to ensure that fiscal incentives further sustainable development and support policy objectives rather than hinder them.

Surveillance, monitoring, research and provision of technical advice We believe this section is rather weak and needs a recognition that current levels of information are not adequate to ensure effective delivery of the strategy's objectives. There should be a much stronger commitment to do more and better data gathering and processing: this means both increased data gathering on the ground and innovative use of data already available (i.e. from harvesting heads and machine GPS).

The "equality and empowerment" issue quotes the Scottish Government recognition in the Land Rights and Responsibilities Statement that "There should be a more diverse pattern of land ownership and tenure". Understanding whether this is being achieved requires better information on current (forest) ownership.

Woodland Crofts

We note that there is no reference to woodland crofts in the Draft Strategy, nor to similar models of small-scale forest tenure. Woodland crofts integrate small-scale woodland management with other land management activities, and offer opportunities for housing and business development, thereby contributing to livelihoods and lifestyles and potentially delivering against all 3 objectives of the Draft Strategy.

Answers to consultation paper questions

Q1. Do you agree with our long-term vision for forestry in Scotland? Please explain your answer.

"Scotland will have more forests and woodlands, which will be sustainably managed as a much greater part of the nation's natural capital, providing a resilient, high quality and growing resource that supports a strong economy, a thriving environment, and healthy and empowered communities."

Broadly yes, although we hope we don't have to wait 50 years for these outcomes!

We note that the draft strategy "focuses on both the sustainable management of the forests we have inherited and the establishment of new woodlands, which will help realise our long-term vision for forestry in Scotland." We agree with this dual focus, but consider that the strategy should recognise that adequate resources must be made available to support both the management of existing woods and woodland creation.

The relationship between the strategy's vision and objectives, sustainable forest management as promoted by the Scottish Government (and all Scottish public authorities so far as is consistent with the proper exercise of their functions) and the UK Forest Standard, needs to be clarified.

The strategy should recognise that current forestry practice, whilst it may be compliant with UKFS (and hugely improved from 30 years ago), isn't always satisfactory – for example it often doesn't deliver community aspirations (which is precisely why so many communities want to buy forests and woodlands to deliver more from them), relies heavily on (subsidised) fossil fuels, and is still largely based on either monocultural forests that are vulnerable to pests and diseases or woods

composed of purely native species with limited timber production potential. The scope for more mixed woods delivering a variety of objectives (and in line with the SFS's 3 objectives) should be expanded. Simply put, sustainable forest management as it is interpreted and implemented today will not deliver the 50 year vision.

It is unclear what is intended by the use of the word "modern" in "A long-term commitment to sustainable modern forestry as a key land-use in Scotland" and this should be clarified.

Q2. Does the strategy identify the right objectives for forestry in Scotland over the next 10 years? Please explain your answer.

Broadly yes, although the second objective could include an explicit reference to mitigating climate change.

It is important for the strategy to recognise the constructive cross-overs and dependencies between the three objectives to avoid any perception of a "silo" effect.

Q3. Do you agree with our assessment of the major issues likely to have the greatest impact on the achievement of our objectives? Please explain your answer.

4.1 Wood fibre supply and demand In stating that "Scotland has ... a highly efficient timber-processing sector" this takes a very narrow view of efficiency criteria. Other criteria (jobs per m³ of wood, added value per m³ of wood, timber miles) might paint a different picture.

We do not completely agree that "understanding and responding to the balance of supply and demand for Scottish wood fibre and products is fundamental to achieving the objective of increasing the contribution of forestry to sustainable economic growth. This is a particularly important driver of financial value and investment" – yes the processing industry is important but it's increasingly automated and the scope for innovation and growth is elsewhere.

Rephrasing this issue as "Wood fibre and products supply and demand" would broaden the focus of point, and imply a wider range of scales and markets.

4.3 Economic development: national, regional and local This section is critical yet is hedged with all sorts of caveats and apologies: it starts by reiterating what's already been said in 4.1 "As we have already noted, Scotland's forests and woodlands have an important role to play in supporting sustainable economic development at national, regional and local levels. We have seen substantial inward investment in our timber-processing sector and this needs a growing and predictable supply of sustainable wood fibre."

There is then an endorsement of forestry's role in local economic development, but it's clear this is considered only "in addition" to the primary role of supplying fibre to the timber processing sector. This section closes with a chunk of text that surely belongs in 4.1 not 4.3: "At the same time, we must also recognise the challenge of ensuring that this economic growth occurs in a sustainable and inclusive manner and ensure that we minimise any potentially negative impacts on local communities and the environment (e.g. from the transportation of timber)." It is timber supply to remote processors that needs to ensure that it occurs "in a sustainable and inclusive manner" and minimises "negative impacts on local communities and the environment".

Consideration should be given to more fully recognising sustainable economic growth and the important connection which exists between communities, people and traditional forest production. In a number of cases – particularly in the Highlands and Argyll – community ownership

and management of woodlands has been the key driver in promoting more sustainable communities and population retention and growth.

4.6 Climate change The strategy should include a commitment to reduce forestry's own carbon footprint and wean the industry from its reliance on (cheap) diesel.

4.7 Tree pests and diseases The strategy should acknowledge that we need to adapt silviculture and forest design (e.g. moving away from monocultures and encouraging more mixed woodlands) to reflect the new reality where pests and diseases are standard, not just one-offs.

4.8 "Wild" deer Why do we have to say "wild" deer? We don't feel the need to refer to "wild" hylobius. The term is an attempt to abdicate responsibility on the part of those who've failed, often deliberately, to adequately manage deer numbers over the last 70 years.

Q4. Do the ten priorities identified in table 2 capture the areas where action is most needed to deliver our objectives and vision? Please explain your answer.

1 Promote and develop the concept of sustainable forest management (SFM) - The Forestry & Land Management Act (F&LM) says "promote SFM" so naturally that needs to be here but the development of SFM is essential too: however as noted in the response to Q1 it's not so much development of the concept that's needed as development and improvement of forestry practice to bring it closer to SFM ideals.

3 Ensure wood fibre availability from Scotland's forests is predictable and increases over time This is an important priority but we are unclear as to why it gets a tick in the environmental column.

4 "...promote" sustainable management of wild deer This is weak and non-committal: deer are a major issue both for woodland creation and management and deer control should be phrased with a more active verb ("ensure" or "increase"). Currently this looks like admission that vested interests will ensure that nothing significant will be achieved. We acknowledge that much of the root of the deer problem lies outwith the remit of forestry agencies however we understood the point of bringing forestry closer to heart of government is that not just FCS's job to deliver this strategy but other agencies too (as enshrined by the F&LM Act). This includes the promotion of effective and inclusive Deer Management Groups with the implementation of multi-purpose management plans which include an emphasis on "public good", but should also include much stronger remedial action where voluntary structures are not working effectively.

5. Increase community ownership and management of forests and woodlands We are pleased to see this as a key priority and agree that it supports the LRRS and delivers the IM acres target but the strategy should recognise that the primary objective of communities who seek to own or manage forests is better forest management and that community ownership and management should be encouraged as a means to deliver more public benefit outcomes from forests, including many of the Scottish Government's 16 national outcomes.

Q5. Can you provide any examples of delivery mechanisms that have previously been effective in delivering similar objectives and priorities?

Q6. For any delivery mechanism examples given in answer to question 5, please explain why they worked well?

Specialist advisory services Direct funding of specialist not-for-profit advisory services, e.g. CWA, to deliver particular objectives or to support particular groups of forest owners / managers to do so has proved an effective mechanism for the delivery of the current strategy. The key advantages are the provision of specialist knowledge, from a source trusted by beneficiaries and good value for money

WGS & SFGS The Woodland Grant Schemes and the Scottish Forestry Grant Scheme, whilst not perfect, were widely perceived by applicants as simpler, more effective and less discriminatory towards small scale forestry than the SRDP schemes which replaced them. Key advantages were that they were operated directly by Forestry Commission Scotland, without being hamstrung by “integration” with SGRPID systems and bureaucracy. These schemes had an appropriate balance of resources between woodland creation and the management of existing woodlands.

Q7. Do you think the proposed progress indicators are the right ones? Please explain your answer.

It's unclear what “Woodland contribution to Natural Capital Index” means in practice.

Q8. Do you have any suggestions for other indicators we could use to measure progress (especially ones which draw on existing data)?

Q9. For any indicators suggested in answer to question Q8, please explain why you think they would be appropriate.

Additional indicators are required to monitor forestry's contribution and progress in a variety of areas, including diversity of forest ownership, community engagement, inclusion & diversity and climate change etc.

Possible indicators include:

Change in private forest ownership

Number of woodland crofts

Number of communities engaged in management agreements and partnerships

Number of people supported through woodland based health and well-being programmes

Female % of workforce

Timber miles

Q10. Would you add or change anything in the Equality Impact Assessment (which includes our assessment of the potential impact of the strategy on inequalities caused by socioeconomic disadvantage – Fairer Scotland Duty)?

Given the high level nature of the strategy and the lack of information around implementation and resourcing it is very difficult to assess the impact of the strategy. It is clear however that implementation of the strategy and decisions around resourcing do have potential impacts on inequalities caused by social disadvantage, so it is important that these policies are appropriately assessed.

Q11. Would you add or change anything in the Business and Regulatory Impact Assessment

Q12. What are your views on the evidence set out in the Environmental Report that has been used to inform the assessment process?

Q13. Should any additional evidence sources be used in the Environmental Report? Please provide details.

Q14. What are your views on the predicted environmental effects as set out in the Environmental Report?

We disagree with the assessment that community ownership will not impact on environmental topics (other than population and human health). There is a long track record of successful community ownership and management delivering a range of positive environmental benefits from previously undermanaged (and sometimes abandoned) woods and forests, whilst the Community Asset Transfer provisions are predicated on communities delivering greater levels of public benefit than public authorities.

Q15. Do you agree with the conclusions and recommendations set out in the Environmental Report?

Q16. Please provide any other further comments you have on the Environmental Report.

Q17. Do you have any other comments you would like to make about the draft strategy for forestry in Scotland?