

# Response to the Consultation paper

## (Forestry Commission Scotland draft Climate Change Action Plan 2008- 2010)

### a) General comments

1. This is a very well presented and thought out document. It sets the right context and gives a good analysis of climate change issues relating to forestry in the UK. We can not fault the proposed actions and we feel as though FCS is very much a leading player in the national response to climate change. In some areas, though, actions could go a bit further.
2. Reference is made to Britain's target to cut its carbon emissions, but there also needs to be reference to national, corporate and personal responsibility to reduce dependency on fossil fuels. Should FCS be leading government agencies to support zero-carbon Britain?
3. There is perhaps not enough interlinking of the different actions (for example LISS is referred to several times but stands alone in each context heading).
4. There needs to be more reference to UK wide / European responses of forestry to climate change.
5. We must act given the urgency of the situation even before we have all of the scientific information. In addition there needs to be a flexible and well-funded research effort.

### b) Detailed comments (please tell us the **Action Plan page(s)** to which each of your comment refers)

- Page 3 – Given that our knowledge and understanding of climate change is continually growing it is appropriate that the review date is only two years from now, even though actions have to be aimed at much longer-term impacts
- Page 5 - Action could also include: Promoting the UK forestry standard as a condition of grant funding and providing support for forests to be certified to UKWAS.
- Page 5/6 – We agree with the recommendations to minimise deforestation and to promote compensatory planting where deforestation is desirable. Does forest loss need to be compared with woodland creation to give a national net-woodland creation figure?

FCS is also working at an international level and is it appropriate in this document to refer to actions taken at this level to reduce forest loss in other countries?

- Page 6- A further point under Principles is that consideration should be given to transforming uneconomic remote conifer plantations to low intensity management, native woodland of appropriate species.
- Page 7 – We support the recognition that the plan give to the role of LISS and we encourage FCS to be bold in its support for LISS on the ground.

Reference could also be made to the role of long term retentions and the role of native woodlands that are both referred to elsewhere. More research is needed to understand the implications of removing brush from sites, either for fuel or for efficient re-stocking.

- Page 9- It would be useful to say when land may or may not be suitable for afforestation. Even outwith designated areas there may be herb rich grasslands, peaty soils or other considerations that preclude woodland creation. This section could also be expanded as the next generation of Indicative Forestry Strategies may be some time in coming. The additional benefits of new native woodlands need to be stressed here too.
- Page 9 – Is 25% forest cover ambitious enough? 30% to 40% would be appreciated, but is this a forest strategy issue?
- Page 9 – Are grant incentives for planting sufficient, or do we need a cultural shift in our appreciation of forests in order to really get the planting levels up?
- Page 10- SRC has been given too much emphasis. There more emphasis needs to be given sort rotation forestry with particular reference to hardwood coppice, with rotations of 10-15 years. This is very relevant to farm forestry.
- Page 10- Producing electricity from wood fuel is very inefficient so the emphasis needs to be on CHP and producing heat alone.
- Page 11 – Please don't spend too much effort on carbon offsets! Prioritise spending on research and real action on the ground!
- Page 12- Ecological adaptation section is well written
- Page 12 – What role will indicative forest strategies have in building on and monitoring forest habitat networks? Support is required to bring core areas into condition as well as expanding networks from core areas.
- Page 19- There needs to be some discussion about the 'all the eggs in one basket' syndrome, especially with regard to Sitka spruce. Mixtures are advocated elsewhere yet this issue is not discussed with regard to spruce.
- Page 20 - The UK Forestry Standard must recommend robust forestry; mixtures rather than single species, appropriate species and provenance choice, etc.

Where is carbon conservation not a priority?

Timber prices may encourage thinning and increasing the wind firmness of stands, if carried out at the right time of year and earlier enough in the rotation. Increased windthrow hazard will bring commercial forestry down the hill or plantation crops will be managed on shorter rotations as energy crops.

- Page 23 – No mention of ground preparation (drainage especially) in flood risk prevention. Ground preparation may not be advocated for other reasons; e.g. the release of soil carbon.

The positive role of woodland creation should be emphasised.

- Page 24- FCS support of wood fuel is exemplary, but reference could also be made to "Wood Fuel News". We would encourage more FCS offices to make fuel efficiencies and convert to woodfuel or to develop partnerships on district heating schemes. Wood energy needs to be seen as part of a shift to more sustainable heating systems with passive solar heating, etc seen as the least demanding on any form of carbon based heating. Locally supplied, small to

- Page 26- More could be made of developing markets for the innovative use of hardwood timber and growing quality broadleaves to supply the demand. There is no mention of encouraging minor conifers, such as larch & Douglas fir, which are in demand for building finishes & cladding.
- Page 28- Very much support the reduction in road miles and the encouragement of local processing. The suggested solutions are very weak.
- P29 – No reliance on bio-diesel please, it is not sustainable. We need to find real alternatives and the rising impact of fuel costs has to be thought through. What is being done to improve engine efficiency? What is being done to improve organisational efficiencies so that we rely on less fuel? What are we doing to maintain traditional horse-logging skills in the absence of any alternatives?

Look at what they are doing in other industries to reduce consumption and carbon emissions and see how these can apply to forestry as well.

- Page 30- There could be a reference to working with voluntary organisations such as Reforesting Scotland, Community Woodland Association, Borders Forest Trust, N Highland Forest Trust and the Woodland Trust Scotland to raise awareness more effectively than FCS can alone.

Education has to include reducing our demand for carbon based energy, minimising waste, etc as part of reducing our impact on forests and other environments.