

CWA Response to Consultation on: Forest Enterprise Scotland - Framework Strategic Plan 2008-2013

The CWA welcomes the opportunity to comment on the FES Framework Strategic Plan

In general we have a positive view of the draft for consultation, which sets out very thoroughly the wide range of public benefits arising from the national forest estate, and commits FES to some important and welcome actions.

Our comments fall into 4 main categories:

- We would like to see a much more explicit contextualisation of FES's role as a (very important) part of the wider Scottish forestry sector
- We are concerned at the somewhat lukewarm commitment to Community Development
- We are concerned that there is limited information about the process of prioritization
- We believe that some aspirations re silviculture and species do not go far enough

Question 1 Does this paper provide an adequate basis for assessing how Forestry Commission Scotland plans to manage the land and woodlands that form the national forest estate on behalf of the Scottish Government? If not describe what is missing.

The paper certainly demonstrates a wide portfolio of desirable outcomes from the NFE, and we welcome the embrace of multi-objective role of forest management, and also the recognition of the wider exemplar role of FCS – the Inverness FD building at Smithton and the Greenerways initiative

In many instances the division of forest management practice into the 7 headings of the SFS is an artificial one, and some actions: e.g. more low-impact silviculture, or expanding forest habitat networks, have clear benefits in more than one heading

However, this is unfortunately not always the case, and there is no indication of either prioritisation (unless one takes the SFS headings as a 1 – 7 order) or of how prioritization would occur when difficult decision re allocation of resources are made. It may well be that such decisions are taken at a FD level – in which case the FES framework plan should say so – but our examination of various FD strategic Plan suggests that it isn't there either.

Further comments on prioritisation are contained in our answer to Q5 below.

Question 2 With regard to the organisation; does this paper provide an adequate basis for assessing how Forest Enterprise Scotland plans to contribute to the Scottish Forest Strategy? If not describe what is missing.

No. The paper does not allow an effective assessment of FES' contribution to implementing the SFS, because it lacks context or quantification vis-à-vis the rest of the Scottish forestry industry (other than a rather curious comparison of estate size vs SNH)

A table should be added containing some key figures for the National Forest Estate expressed as a percentage of the whole sector :

What %age of Scotland's forest cover / broadleaves / semi-natural woods?

What %age of timber production / new woodland creation / carbon sequestration / public recreation provision / paws restoration?

Inevitably there is a certain amount of guesswork in quantifying private sector activities, nonetheless it would be invaluable to contextualize how significant FES's contribution to particular aspects SFS implementation.

In a related vein, one of the operating principles of FES (p9) is that *"The work of the Agency should facilitate and complement the role of the non-state sector."*

We agree strongly with this principle, but believe that it should be much more widely referenced than it is at present. Many of the desired outcomes require extensive cross-boundary working: large scale landscape design, long distance recreation provision, forest habitat networks, large scale habitat restoration, water quality & catchment management issues etc - co-operation and partnership may well be happening on the ground but with the exception of deer management and control of invasive species this isn't recognised in the Framework Strategic Plan, nor, insofar as we can tell, in the Forest District Strategic Plans

Likewise (and we accept that this comment is more relevant to FD Strategic Plans, understanding the wider context of private sector is vital for FES decision making, e.g. for investment in recreation provision - it is important, given limited budgets etc, that FES activity complements rather than competes with the private sector - again there is no recognition that some settlements already have significant forest recreation facilities provided by the private/community sector.

Question 3 Do you agree with the aspirations presented in this paper for the national forest estate and Forest Enterprise Scotland? If not, what else should be included?

In general we agree with the aspirations presented in the consultation paper. We believe that the target or commitment for some actions is unclear or should be stronger.

Productive Broadleaves:

2.11 we welcome the increase of broadleaved woodland from to 8% to 20% - it would be useful to have an indication of the timescale for this.

2.13 "Aim for 1% of the national forest estate growing productive quality broadleaves by 2050" – We think this is too low, especially as elsewhere it is stated that Area of broadleaved forest assessed as timber producing = 3200 ha (= 0.7%)

Low Impact Silvicultural Systems:

P17: *“Due to the uncertainties of future requirements the management of timber production will be aimed at maximising timber quality. Species choice will be made in line with ecological indicators, initial stocking will be closely monitored and thinning will be presumed for all areas unless there are reasons why this can not be done.”* This commitment to growing quality timber and enhanced silvicultural systems is very welcome. Low impact systems have additional benefits for soil carbon management, biodiversity and amenity. There is no specific target for LISS, though the text says *“The area managed under LISS will increase on the national forest estate from a current area of 9.7% of the woodland cover to about 20%.”* Given that the area of broadleaved woodland is set to grow to 20% this seems a rather low target for the adoption of practices that deliver on so many objectives

Renewable Energy

The Plan should state more explicitly that the greatest potential gains from wood energy will come from small scale & local utilization.

1.04 *“The opportunity to convert all FES offices to sustainable heating will be investigated.”* We think a stronger commitment is needed – e.g. *“FES offices and other premises will be converted to sustainable heating wherever practicable”*

Question 4 Do the actions presented in this paper sit in conflict with yours or your organisations' goals? If so how?

The Community Woodlands Association is the direct representative body of Scotland's community woodland groups. We help community woodland groups across the country achieve their aspirations and potential, providing advice, assistance and information, facilitating networking and training, and representing and promoting community woodlands to the wider world.

A number of our member groups work in partnership with Forestry Commission Scotland, others may be considering using the National Forest Land Scheme to obtain land.

A number of elements of the Community Development section (from p24) appear rather lukewarm.

We are concerned at the 3rd paragraph, which appears to be an opaque way of saying “we want to scale down our operations in this area”:

“The key challenge is our ability to actively support new and ongoing diverse local partnership programmes. There is likely to be a more challenging funding environment for community partnerships than before. Our ability to provide revenue funding to support ongoing partnership projects is limited. We will need to manage expectation and set priorities to ensure continuing delivery of successful outcomes in line with the Scottish Forestry Strategy.”

The previous paragraph has a rather curious conclusion:

“The National Forest Land Scheme (NFLS) is also a significant mechanism for delivery and sets out our approach and procedures for supporting local communities and other organizations who wish to take ownership of parts of the national forest estate, this being inclusive of identifying sites required for affordable housing. The environmental implications of any proposal will be evaluated alongside any social and community benefits. FES will avoid duplicating the effort of other bodies implementing similar schemes in an area, such as Local Authorities, so as to minimise the cumulative impact and not waste Government funds.”

We agree of course that wasting Government funds is a bad thing and to be avoided – but the idea of setting up a scheme and then working to minimize its impact seems counter-intuitive

A final concern re: this section relates also to the repositioning exercise – and the possibility that FES may acquire (or take on lease) land, particularly as part of WIAT, where there is an existing community group working with the present landowner. We would like to see a commitment that such groups will not be “disenfranchised” as part of the process of incorporation within the National Forest Estate.

Question 5 Does this paper indicate that Forest Enterprise Scotland have the correct priorities in regard to forest management opportunities? If not, what would you suggest?

As noted previously, we are in general agreement with the wide suite of objectives laid out in the plan, however, we feel the prioritisation is somewhat opaque, particularly with regard to any conflict between operational (= harvesting) efficiency and wider social / environmental values – and in particular the document says nothing about allocation of resources

We note the Table of Priorities on pp54/5, which *“provides an indication of what priorities are likely to be considered higher for the different management functions within the FES Head Office and the geographically distributed Forest Districts.”*

A number of actions are shaded red, indicating that they are a major priority for FES:

- 1.10: Competent and effective compliance with the Forests and Water Guidelines
- 2.02: Maintain timber production from the national forest estate at a sustainable level of between 3.3 and 3.5 million cubic metres (standing volume) per annum.
- 3.01: By example on the national forest estate promote continuous improvements to the safety culture in the forestry sector.
- 4.03: Undertake stakeholder consultation during the course of preparing or revising Forest Design Plans and Forest District Strategic Plans.
- 6.03: All works that require soil disturbance will be managed in accordance with both the FC Guideline for Water and the FC Guideline for Soils.
- 7.14: Assess the potential impact of management proposals on NATURA sites, either on or adjacent to the national forest estate, using the appropriate assessment process so as to avoid impacting on these sites.

Of course we would not argue against any of these...but they don't exactly set the pulse racing – and in fact boil down to “Follow the environmental rules, improve safety, fell timber and periodically talk to stakeholders”, which is a fairly bland set of major priorities – in fact working in accordance with the various environmental guidelines should be a given of sustainable forest management.

A few other notes and comments

Climate Change

1.09 windthrow tools need significant improvement before they can be used in this way – forest gales uses inadequate models for non-thin sitka
More generally, there needs to be a recognition that forestry practice must adapt to survive in a low-carbon, peak oil world – forest harvesting & timber transport practices are dependent on plentiful (and in the case of harvesting, subsidized) diesel which cannot be expected to be available indefinitely.

Business development:

We think the skills issue could be a significant limiting factor, but also a great opportunity for the industry: more demanding silvicultural regimes = more intensive operations = more skilled jobs and rewarding careers.

There is important recognition of forestry's role in high quality tourism. However there is also important untapped potential for a future contribution to tourism, relating to management decisions regarding the choice of silvicultural system and species choice. These have significant effects on the quality of the forest experience.

Biodiversity:

It would be worth clarifying why such a low % of woodland SSSI's meet condition targets.

This sentence: *“FCS aim to restore all PAWS on the national forest estate; however, this is not always pertinent such as retaining some Norway Spruce in a PAWS site to assist in the maintenance of a red squirrel population.”* needs rewriting for clarity

Portfolio analysis

This is an interesting attempt to quantify the various public benefits derived from the NFE, however scoring public benefit is not quite the same thing as scoring the public benefits arising from public ownership, which is what is required to underpin the repositioning exercise.

It would be interesting to know how the portfolio analysis will be used for acquisition. It is important that acquisition analysis takes account of local context: e.g. the important question is not whether FES is currently providing woodland recreation opportunities around a particular settlement but whether anyone else is.