

Response ID ANON-MZ2Y-MTGD-X

Submitted to **The Future of Forestry in Scotland**

Submitted on **2016-11-09 09:45:02**

Introduction

Are you responding as an individual or an organisation?

Organisation

What is your name or your organisation's name?

Name/orgname:

Galloway and Southern Ayrshire Biosphere

What is your email address?

Email:

emily@gsabiosphere.org.uk

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response with name

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

Please indicate which category best describes your organisation. If you are a representative or umbrella body, please tick the category you represent:

Third sector

If 'other', please state here::

New organisational arrangements in Scotland

1 Our proposals are for a dedicated Forestry Division in the Scottish Government (SG) and an Executive Agency to manage the NFE. Do you agree with this approach?

No

Please explain your answer:

Although we do recognise that by moving FCS into a dedicated Forestry Division within the Scottish Government there is the potential to better align forestry policy and practice with other Government initiatives and strategies we do largely disagree with the approach being suggested.

Fundamentally we feel that a dedicated forestry division within the Scottish Government could ultimately result in the centralisation of services and decision making. The strengths of the current arrangement is regional management allowing for a local approach; with a strong local staff and knowledge base which we can engage with. Good examples of this within Dumfries and Galloway (Galloway Forest District) include the now resurrected Forestry Forum run by Forest Enterprise Scotland which is an annual meeting between FES and interested parties discussing their work and wider issues of local interest (eg. carbon, peatlands, landscape). FES also sit on the Galloway and Southern Ayrshire Biosphere Partnership Board and technical groups, feeding into tourism, business, and natural heritage projects within the Biosphere. In both instances, the commitment shown by FES to these local initiatives have facilitated better engagement with the forestry sector and helped to better integrate forestry with wider interests eg. recreation, tourism, biodiversity, water quality, carbon management.

We are also concerned with how forestry, requiring long term management and thinking, could be managed within Scottish Government over short political timescales.

2 In bringing the functions of FCS formally into the SG, how best can we ensure that the benefits of greater integration are delivered within the wider SG structure?

In bringing the functions of FCS formally into the SG, how best can we ensure that the benefits of greater integration are delivered within the wider SG structure? :

If the function of FCS were to move to within the Scottish Government it would be essential that forest policy and strategies are aligned with wider Government initiatives. It would require a recognition that the National Forest Estate has a role to play in more than just commercial timber production being, for example, important for water quality and regulation, biodiversity, carbon sequestration and storage, recreation and tourism. As such it would be important that the Forestry Division, sitting within the Environment and Forestry Directorate delivers, using the Scottish Land Use Strategy as the mechanism, against all the key

responsibilities of that directorate namely:

- “Scotland’s landscapes, habitats and biodiversity are protected and enhanced for current and future generations, improving the wellbeing and reputation of the people of Scotland, and supporting our tourist industry.
- Scotland’s environment is protected and enhanced through efficient management of resources and minimisation of waste, including through pursuit of the new strategic priority on Transition to a Low Carbon Economy in the Government Economic Strategy.
- The potential of Scotland’s water resources are fully realised in a sustainable way and all of Scotland has good safe drinking water that has the trust of consumers.
- The Scottish Government, its agencies, NDPBs and partners are respected and deliver integrated, seamless and best value services to the rural economy.
- By the second half of this century, people are benefiting widely from Scotland’s trees, woodlands and forests, actively engaging with and looking after them for the use and enjoyment of generations to come. The forestry resource has become a central part of our culture, economy and environment
- RAE policy development and delivery is informed by high quality evidence, analysis and advice”.

What additional benefits should we be looking to achieve? :

See above

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3 How should we ensure that professional skills and knowledge of forestry are maintained within the proposed new forestry structures?

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4 What do you think a future land agency for Scotland could and should manage and how might that best be achieved?

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If a Land Agency was formed to manage the National Forest Estate with the view to extend this to other publically owned land in the future (presumably SNH, local authority and potentially Crown Estate land), it presents a good opportunity to integrate and support cohesive management across all publically owned land. We feel strongly that the National Forest Estate and other publically owned land should deliver multiple public benefits, recognising that commercial forestry, although important for our rural economy, has to be in the right place to minimise the impact on other crucial Ecosystem Services. The obvious mechanism to deliver a more holistic but unified approach to land management for maximum public benefit would be to implement the Land Use Strategy and the Ecosystem Services approach. It would be necessary for the “Forestry and Land Scotland” agency to adopt this approach not just at a national level but at a regional level too. We feel very strongly that within the Galloway and Southern Ayrshire Biosphere many areas are already overburdened with low diversity commercial planting at the detriment to other ecosystems and ecosystem services, and although Forest Enterprise Scotland carries out highly commendable work, such as restoring open habitats and replanting native woodland, national targets to increase forest cover are driving re-planting for low commercial value and reducing the opportunities to diversify our woodland and National Forest Estate. We recognise that, in principle, increasing woodland cover across Scotland is appropriate due to heavy deforestation in the past, and the potential it has to support our rural economy, but planting has to be undertaken in the right places with the right species mix for maximum benefits. The land agency must be set up in a way that reflects local priorities in balance with national targets.

We are pleased the Scottish Government recognises the need to maintain professional skills and knowledge of forestry. We would go further and repeat that these skills need to be kept at the local level. Continuing partnership working would also be important, the Galloway and Southern Ayrshire Biosphere being a good example of the role the new land agency could play in supporting regional initiatives and priorities.

Finally we think there is a lot in a name and the title “Forestry and Land Scotland” indicates an undue preference for forestry over other land use, we’d suggest it would be better to title such an agency “Landuse Scotland”.

Effective cross-border arrangements

5 Do you agree with the priorities for cross-border co-operation set out above, i.e. forestry research and science, plant health and common codes such as UK Forestry Standard?

Yes

6 If no to question 5, what alternative priorities would you prefer? Why?

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7 Do you have views on the means by which cross-border arrangements might be delivered effectively to reflect Scottish needs?

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Legislation and regulation

8 Should the Scottish Ministers be placed under a duty to promote forestry?

No

9 What specifically should be included in such a general duty?

What specifically should be included in such a general duty?:

If Scottish Ministers were to be placed under a duty to promote forestry we would support a much broader general duty, particularly given the intention for the new land agency to manage other publically owned land, not just the National Forest Estate. We suggest that the general duty better reflect the wider responsibilities of the Environment and Forestry Directorate.

We agree with the original general duties of the Forestry Act 1967:

- The production and supply of timber and other forest products
- The establishment and maintenance of adequate reserves of growing trees (although "adequate" would need defining and needs to reflect changes in demand over time)

And agree with:

- Using land in Scotland placed at their disposal by the Scottish Ministers in the way best calculated to contribute to the delivery of the targets set out in or under Part 1 of the Climate Change (Scotland) Act 2009.

We would amend the original general duties to include:

- Interests of sustainable land use (not just interests of forestry) and the adoption of the principles of the Land Use Strategy
- Development of afforestation in line with principles of the Land Use Strategy
- Interests in recreation and social health and wellbeing
- Nature conservation (both woodland and non-woodland interests)
- Water quality and regulation
- Interests in communities; ownership and engagement

10 Recognising the need to balance economic, environmental and social benefits of forestry, what are your views of the principles set out in chapter 3?

Recognising the need to balance economic, environmental and social benefits of forestry, what are your views of the principles set out in chapter 3?:

The devolution of forestry:

Although we mostly disagree with the intention to move the function of FCS to within Scottish Government we do agree with the introduction of primary legislation and the devolution of forestry, while recognising the need for some continued cross border co-operation. Having full control of forestry within Scotland has the potential to better reflect land use, the forestry industry and woodland mix within Scotland, where for example, conifers make up 74% of woodland cover compared to just 26% in England (IFOS-Statistics, Forest Research 2016).

International standards of good forestry:

We support the Scottish Governments commitment to maintain international standards of good forestry (Sustainable Forest Management). We feel strongly that there needs to be an emphasis on good forest design and long term stewardship of the National Forest Estate.

We fully support "the stewardship and use of forest lands in a way, and at a rate, that maintains their biodiversity, productivity, regeneration capacity and vitality and their potential to fulfil, now and in the future, relevant ecological, economic and social functions at local, national and global levels, and does not cause damage to other ecosystems" (Ministerial Conference on the Protection of Forests in Europe 1993). We wish to see this as the guiding principle for forestry management in Scotland as it recognises the wider provision of ecosystem services and the potential long term multi-benefits of woodlands. Currently, the lack of detail around "reasonable balance" under section 1(3A) of the Forestry Act 1967 is of concern and we would want to see this defined, reflecting the statement above, within both a regional and national context.

Felling in accordance to defined standards of good forest strategy:

We agree that felling should be carried out in accordance to defined standards and good practice. However, we urge the Scottish Government to consider carefully intentions such as the enforcement of obligations to carry out restocking. Such obligations need to be founded on a good scientific understanding of the potential short and long term impacts of restocking on the full range of ecosystem services as well as an assessment of the actual quality of timber/woodland being supported by second and third rotations.

Flexibility to use NFE land for a variety of purpose:

We fully agree that there should be flexibility to use NFE land for a variety of purposes. It has to be recognised that forests provide a range of ecological, societal and economic services and replanting/afforestation may not always be appropriate on NFE land.

Assessing impact

11 Are there any likely impacts the proposals contained in this consultation may have on particular groups of people, with reference to the 'protected characteristics' listed in chapter 4? Please be as specific as possible.

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Not that we are aware of at this time.

12 Do you think that the proposals contained in this consultation are likely to increase or reduce the costs and burdens placed on any sector? Please be as specific as possible.

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We do not feel that we can adequately answer this at this time due to the limited detail set out in the consultation document.

13 Are there any likely impacts that the proposals contained in this consultation may have upon the privacy of individuals? Please be as specific as possible.

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Not that we are aware of at this time.

14 Are there any likely impacts that the proposals contained in this consultation may have upon the environment? Please be as specific as possible

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Without further details of how the proposed new structure and the new land agency would balance the remit "to deliver specific economic, environmental and social outcomes, including maintaining the current guaranteed provision of timber to Scotland's timber processing sector, contributing to our climate change targets and environmental objectives, and transferring land to communities" it is difficult to answer this fully. However, we do feel that the proposals have the potential to impact on the environment as they seem to support a reaction to short term Government targets for woodland expansion, focusing on the forestry agenda over other land uses and ecosystem services. We note that the Land Use Strategy, a mechanism developed by the Scottish Government as a key commitment of Section 57 of the Climate Change (Scotland) Act 2009, for "how we can sustainably manage our land to ensure we get the most from it" is not expressly mentioned in the consultation documents. We fear that the emphasis placed on the role of forestry for our rural economy has the potential be detrimental to open habitats and biodiversity, particularly in the uplands, and farming within the Galloway and Southern Ayrshire Biosphere.

We also urge the Scottish Government to consult further on specific intentions such as the enforcement of obligations to carry out restocking under a duty to ensure felling in accordance to defined standards of good forestry. Such obligations need to be founded in good scientific understanding of the impact of such restocking policies on a range of ecosystem services and the actual quality of timber/woodland being supported.

Any other comments

15 Do you have any other comments that you would like to make, relevant to the subject of this consultation, that you have not covered in your answers to other questions?

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Evaluation

Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Slightly dissatisfied

Please enter comments here.:

General lack of detail in the consultation documents meant it was difficult to answers certain questions at this time.

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Slightly satisfied

Please enter comments here.:

The online system was very straightforward to use (should you have access to a good internet connection).