

CONSULTATION

Response Document



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**Forestry and wood processing sector plan
(Scottish Environment Protection Agency)**

23 September 2019

Introduction to CIEEM

The Chartered Institute of Ecology and Environmental Management (CIEEM), as the leading membership organisation supporting professional ecologists and environmental managers in the United Kingdom and Ireland, welcomes the opportunity to comment on this consultation.

CIEEM was established in 1991 and has over 6,000 members drawn from local authorities, government agencies, industry, environmental consultancy, teaching/research, and voluntary environmental organisations. The Chartered Institute has led the way in defining and raising the standards of ecological and environmental management practice with regard to biodiversity protection and enhancement. It promotes knowledge sharing through events and publications, skills development through its comprehensive training and development programme, and best practice through the dissemination of technical guidance for the profession and related disciplines.

CIEEM is a member of:

- Environmental Policy Forum
- IUCN – The World Conservation Union
- Professional Associations Research Network
- Society for the Environment
- United Nations Decade on Biodiversity 2011-2020 Network

Comments from CIEEM

Introduction

We welcome the opportunity to participate in this consultation. We would be happy to provide further information on this topic. Please contact Jason Reeves (CIEEM Head of Policy and Communications) at JasonReeves@cieem.net with any queries.

General Comments

Throughout the Forestry and Wood Processing Sector plan we would like to see clearer division of the areas that SEPA will cover to enhance the work that Scottish Forestry and Forest and Land Scotland already have responsibility for. This is covered in the later stages of the document (page 20 onwards) but this should be a lot clearer from the start of the document. Scottish Forestry have responsibility for the policy, regulatory and support functions previously assigned by Forestry Commission Scotland (FCS). By working across sectors, SEPA can enhance the work that Scottish Forestry and Forest and Land Scotland do by identifying opportunities across sectors and bringing them together to further enhance the forestry and wood processing sectors. For example, elements of the Strategic Infrastructure (transport and utilities) Sector plan could usefully feed into the Forestry and Wood Processing Sector plan.

1

(a) Do you agree with our vision and the level of ambition?

We welcome the fact that the vision is outcomes-focussed and is aligned with Scottish Government's ambitions and policy, however, we would like to see the vision include an achievement of Biodiversity Net Gain (BNG), which refers to leaving biodiversity in a better state than before. This is in line with the Biodiversity Duty, outlined in the Nature Conservation (Scotland) Act 2004 and the Wildlife and Natural Environment (Scotland) Act 2011, which places a statutory duty on all public bodies to further the conservation of biodiversity.

We have championed the 'net gain' approach for some time and have produced the first UK Biodiversity Net Gain Principles¹, jointly with the Construction Industry Research and Information Association (CIRIA) and the Institute for Environmental Management & Assessment (IEMA), and guidance for developers with the same partners². We have also produced a briefing paper on BNG in Scotland³. Although our principles and industry guidance are aimed at development, the approach can be directly applied to forestry. When expanding woodland, the BNG approach can be applied alongside Ecological Network planning to ensure biodiversity is not lost from priority open habitats.

¹ <https://www.cieem.net/biodiversity-net-gain-principles-and-guidance-for-uk-construction-and-developments>

² <https://cieem.net/i-am/current-projects/biodiversity-net-gain/>

³ <https://cieem.net/wp-content/uploads/2019/06/Biodiversity-Net-Gain-in-Scotland-CIEEM-Scotland-Policy-Group.pdf>

(b) Would you like to see anything added or amended to improve our vision?

Although it is partly implied under 'resilience', the plan should make specific mention to pest and disease-free forestry plantations and biosecurity measures to contain spread to other species and ecosystems, for example, *Phytophthora ramorum* spread from larch to blaeberry (*Vaccinium myrtillus*) in the wild.

We would like to see a link to the Scottish Forestry Strategy 2019-2029 which highlights where SEPA can aid further progress. In addition, we would like to see wider thinking across sectors where opportunities exist, for example, in relation to transport, housing (with such a high percentage of new homes in Scotland built using wood) and agriculture (such as animal bedding).

2

(a) Do you think we have captured the main environmental risks and impacts of the sector in Figure 7?

No, the main environmental risks and impacts of the sector activities that SEPA regulate have been captured, however there are additional measures that should be included.

(b) Are there any other risks and impacts that should be included?

Tree pests and diseases will become an increasing problem, with climate change leading to a greater abundance of pests and diseases and the arrival of new species in the UK. Although SEPA's remit is not plant health, the fungus *Phytophthora ramorum* and the pine disease *Dothistroma* (red band needle blight) have not been included in the sector plan. Once *P. ramorum* is present in larch, this can lead to having to clear-fell large areas of forestry, for example, in Dumfries and Galloway. This will ultimately lead to the increased risk of silt contamination and pollution of the water environment if clear-felling is poorly managed. Biosecurity measures and awareness raising of these diseases (and others) should be captured somewhere in the sector plan.

Although the potential for felling operations to impact on soil quality, structure and functionality from poor site management is stated, there is no mention of carbon storage and sediment loss. This should be added.

Potential flood risk following harvesting should be listed as an environmental impact. Poor management of forestry land can result in increased flood risk and the role of forestry in natural flood management should form an integral part of catchment-scale planning, with Forest and Land Scotland working directly alongside SEPA and the River Trusts. This is particularly relevant with climate change mitigation and adaptation.

We would like to see a reference to potential land use conflict especially with the ambitious tree planting targets, and how this relates to Scotland's Land Use Strategy 2016-2021. There are currently many instances where forestry in Scotland is competing with the maintenance of an open landscape, the maintenance of territories for wide-ranging bird species such as raptors, upland livestock grazing and sporting management. This needs to be addressed.

The fifth bullet point, in relation to biodiversity, should include habitat loss.

3

(a) Have we identified all the main influences for this sector in Figure 8?

No.

(b) Are there other influences that you think should be included?

Reference should be made to community woodlands and private landowners, and bodies representing them such as Scottish Land & Estates.

It should also reference professional bodies as influencers.

(c) Please tell us about any relationships you have with any of the influences that we might be able to use to help implement the sector plan.

N/A

4

(a) Have we identified all the actions we should take to solve compliance issues in the sector?

The draft sector plan identifies practical and affordable aspirations and we welcome the fact that they are being driven by the sector. The compliance issues where improvement is required have been identified clearly and actions to improve compliance have been prioritised.

We also welcome the Tilhill Forestry Initiative example and the fact that SEPA are committing to support and promote this as a good example for the sector.

However, the aspirations do not directly relate to the actions laid out in the plan. We would like to see a commitment to delivering on the aspirations. There is also a lack of quantifiable targets to measure delivery of the actions. These should be included.

(b) Are there other actions that you think we should be taking to improve compliance?

The actions should also help to capture sub-contractors working on forestry sites through induction and toolbox talks etc.

Under the commitment to assist Scottish Government and Scottish Forestry to deliver the vision, aims and priorities of the Scottish Forestry Strategy, there should be a commitment to help *“maintain and enhance biodiversity, in particular by using the recruitment of natural regeneration and improving mitigation of the risks posed by invasive non-native species, deer and other herbivores”* as laid out in the strategy.

5

(a) Have we identified the right opportunities we could take to help businesses to go beyond compliance?

These actions are affordable and could be achieved through synergistic partnerships. However, they are not exhaustive. In particular, they do not include any reference to impacts on biodiversity. ‘Environmental impacts’ needs to be defined with the inclusion of native fauna and flora, and high biodiversity. In addition, these will need reviewing and refining with a changing climate.

(b) Please tell us about any other opportunities that you think could be included to help business in this sector to move beyond compliance?

As mentioned in question 1(a), the implementation of BNG presents a significant opportunity for businesses to move beyond compliance and ensure the natural environment is left in a measurably better state than beforehand i.e. ‘the right tree in the right place for the right purpose’.

SEPA could look at circular economy opportunities for products traditionally regarded as waste, by linking in with organisations such as Zero Waste Scotland and Resource Efficient Scotland.

The multiple benefits of forests should be promoted, for example, health and wellbeing, as well as economical benefits. SEPA could develop an ecosystem services approach for this purpose.

Networking, sharing experiences and keeping close links with Forest Research to explore different approaches overseas, are essential to move beyond compliance.

In Scotland, there are vast areas of plantation that have been clear-felled with little thought as to succession, erosion issues, invasion of ruderal plants and the negative impacts on Scottish tourism through landscape changes. The sustainable management of clear-felled areas should be incorporated into the vision and objectives.

6

(a) Do you think the actions are ambitious enough?

The actions outlined in this draft sector plan are a very good start to build on and refine as more information becomes available, however, they will need to be reviewed and potentially re-prioritised to adapt to a changing climate.

(b) Which of the actions and aspirations proposed in this plan do you consider to be of the highest priority?

Implementing actions to protect and improve water quantity and quality are high priority. Natural Flood Management (NFM) opportunities will also help to deliver River Basin Planning and Flood Risk Management Plan objectives and appropriate NFM riparian planting will help improve biodiversity. These are measures that can be delivered through a partnership approach, thus avoiding duplication of effort and funding.

In any case, actions to protect biodiversity from pollution and habitat degradation should be prioritised.

We would also like to see efforts focussed on aspects relating to the circular economy and areas that Scottish Forestry are unlikely to cover, for example, using heat from biomass combustion plants.