

# CONSULTATION

## Response Document



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### **Scottish Forestry Corporate Plan Consultation (Scottish Forestry)**

**5 February 2020**

## 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
- Greener UK
- Irish Forum on Natural Capital (working group member)
- National Biodiversity Forum (Ireland)
- The Environmental Science Association of Ireland

CIEEM has approximately 600 members in Scotland who are drawn from across the private consultancy sector, NGOs, government agencies, academia and industry. They are practising ecologists and environmental managers, many of whom regularly provide input to and advice on land management for the benefit of protected species and biodiversity in general.

We welcome the opportunity to participate in the consultation on Scottish Forestry's Corporate Plan and would be happy to provide further information on this topic. Please contact Jason Reeves (CIEEM Head of Policy and Communications) at [JasonReeves@cieem.net](mailto:JasonReeves@cieem.net) with any queries.

## Comments from CIEEM

### General Comments

The Plan states that the Forestry Strategy Implementation Plan will be published alongside this Corporate Plan by 1 April 2019, following engagement with a wide range of stakeholders. Publication of the type and level of engagement would be useful to understand which organisations have contributed to the process and how we can contribute further.

Some sections of the plan are incomplete for example, page 9: Responding to the Global Climate Emergency and Page 11. Urban woods and forests. This makes it difficult to consider these fully, however, the section on responding to the climate emergency (paragraph 3.3) and Scotland's Forestry Strategy (paragraph 3.4) should clearly include a commitment to the 'right tree, in the right

place, at the right time' principle as laid out in Scotland's Forestry Strategy. Although Scottish Forestry is focused on the forestry aspect of the response to climate change, there must be clearly set out joined-up thinking on the benefits of other habitats, such as peatlands, for both biodiversity and carbon sequestration.

## **Responses to Consultation Questions**

### **Introduction to Scottish Forestry**

#### **Q1 - To what extent do you agree that the Corporate Plan provides a good introduction to the role and structure of Scottish Forestry?**

Agree strongly

#### **Q2 - To what extent do you agree with the Purpose contained in the Corporate Plan?**

Agree slightly. The purpose is clear, yet we would like to see reference to the overarching role that Scottish Forestry has to provide guidance and support to Forest and Land Scotland, the Woodland Trust, private estate owners, NGO landowners, Local Authorities' (LAs) and community woodlands.

#### **Q3 - To what extent do you agree with Strategic Objective 1 as a priority for our work over the next three years**

Agree strongly. Overall, the activities provide strategic direction and the level of detail needed that was missing from the Forestry Strategy. Modern forestry practice has developed to mitigate environmental risks and it is important that the sector maintains and develops these practices. With ambitious tree planting targets needing to be realised it is important that best practice is followed. This is identified in the UK Forestry Standard (UKFS): the national reference standard for managing our forests to meet needs now without hindering future generations from meeting theirs. Scottish Forestry has an important role of regulating this across a diverse range of organisations.

#### **Expanding the area of forests and woodlands, recognising wider land-use**

We are glad to see reference to potential land use conflicts, particularly with the ambitious tree planting targets as conflicts are arising due to conflicting pressures. 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. Woodland expansion cannot be at the expense of other priority habitats such as bog and heather moorland, so careful planning of expansion is essential.

To deliver the ambitious tree planting targets many organisations will be involved, including Forest and Land Scotland, Woodland Trust, private estates and environmental NGOs such as Trees for Life. Therefore, an overarching plan and vision linked to Scotland's Land Use Strategy 2016-2021 is needed to ensure that woodland expansion is done in the right way connecting woodland fragments for biodiversity benefit. Scottish Forestry can play an important role in outlining the vision and co-ordinating activities. Expansion should also not be at the detriment of other habitats that are important for carbon sequestration.

We agree that woodland expansion targets should be delivered through a mix of commercial forestry and native broadleaf woodlands at a range of scales and a large proportion of the planting made up of native Scottish species. There is already a strategy of the 'right tree' but the extent to which this has been implemented is not yet clear. Greater emphasis should be placed on the promotion of tree nurseries so that tree planting on large scale developments, such as the dualling

of the A9 and AWPR, comes from stock of local provenance. At present nurseries supplying stock of local provenance are struggling to keep pace with the increased demand.

There should also be an emphasis on supporting developments seeking to achieve biodiversity enhancements through replacement of non-native tree species with native mixes, and/or a mix of forestry and non-forested habitats, where relevant.

Although there is widespread recognition that there should be an increase in urban tree cover, often Local Authority ecologists are unclear as to which tree species they should be planting. Therefore, there is an information exchange gap that Scottish Forestry could address, and CIEEM can disseminate information to members.

### **Improving efficiency and productivity, and developing markets**

Many of the activities outlined under 'improving efficiency and productivity, and developing markets' are valid and ideally would be done in partnership with other organisations. For example, there is great potential to link with SEPA's plans as outlined in their Forestry and Wood Processing Sector Plan. We would encourage 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). There are also aspects that could be developed with SEPA relating to the circular economy, for example, using heat from biomass combustion plants.

Innovations to reduce the impact of felling on soil quality, structure and functionality, carbon storage and sediment loss from poor site management are essential and should be a key focus.

It is positive to see the commitment to support businesses of different types and scales to develop and grow markets for forest tourism and recreation opportunities. Woodlands provide opportunities to connect with nature and enhance physical and mental health. Support of OWLS (Outdoor and woodland learning groups), forest schools, and joint working with the ranger services, will ensure that forest resources are well used by future generations.

### **Increasing the adaptability and resilience of forests and woodlands**

The activities listed under increasing the adaptability and resilience of forests and woodlands activities are welcomed. Tree pests and diseases are a significant issue, which will be exacerbated by climate change. Therefore, efforts should be focussed on biosecurity to prevent initial introduction and rapid response. Education and awareness raising of biosecurity and tree pests and diseases is also essential for members of the public visiting woodlands and forests.

The rapid spread of *Phytophthora ramorum* on larch highlights the importance of rapid response. When found in nurseries in 2002, swift action and a biosecurity zone around the nurseries should have been established. However, there is now a situation where it is almost impossible to fell all the infected trees.

We welcome the commitment to the use of natural regeneration. Often it is assumed that natural regeneration will automatically take place after clear-fell however the presence of brash, grazing animals and other factors can prevent trees establishing themselves. Mitigation of these factors must be considered to ensure regeneration is effective and soil health is well managed.

### **Enhancing the environmental benefits provided by forests and woodlands**

We welcome the inclusion of all the listed activities, however, we would also like to see continued emphasis on the creation and maintenance of ecological networks. 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 Principles<sup>1</sup>, 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 partners<sup>2</sup>. We have also produced a briefing paper on BNG in Scotland<sup>3</sup>. 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.

Supporting the management of forests and woodlands to reduce potential flood risk following harvesting, and the role of forestry in natural flood management, should form an integral part of catchment-scale planning, with Scottish Forestry, Forest and Land Scotland working directly alongside SEPA and the River Trusts. This is particularly relevant for both climate change mitigation and adaptation.

### **Engaging more people, communities and businesses in the creation, management and use of forests and woodlands**

We particularly welcome the link between Scottish Forestry's work and health and wellbeing. Nature can have a significantly positive impact of people's mental and physical health. There should be an emphasis on increasing the inclusivity of access to Scotland's woodlands and forests, ensuring the benefits are fully recognised and available to all.

### **Measuring performance**

The focus on simply measuring progress on woodland creation targets does not provide any means of assessing quality of woodlands. There should be a focus on improving the condition of existing woodlands and forests, as well as monitoring the condition of planted and naturally regenerated expansion. This should particularly measure biodiversity and the provision of ecosystem services.

### **Strategic Objective 2: Ensure that Scottish Forestry is a supportive, innovative and inclusive organisation**

#### **Q4 - To what extent do you agree with Strategic Objective 2 as a priority for our work over the next three years?**

Agree strongly.

#### **Q5 - To what extent do you agree with the priorities associated with this Strategic Objective?**

Agree strongly. A highly motivated workforce that is engaged and feels part of a greater goal will most effectively deliver strategic objective one and the wider goals of Scottish Forestry.

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

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

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

As recognised within Scotland's National Outcomes, there is a need to prioritise ongoing education and continued professional development. Staff should be encouraged to maintain a strong knowledge of advancements in the sector.

**Q6 - To what extent do you agree with the activities associated with this Strategic Objective?**

If staff feel involved in corporate decisions, they are more likely to effectively deliver them. Career development and membership of a professional body is an important progression for staff, and we would be happy to support Scottish Forestry in this area through our training and mentoring programme.

**Q7 - To what extent do you agree with Strategic Objective 3 as a priority for our work over the next three years?**

Agree strongly. Reporting, accountability and continuous improvement strategies should be at the heart of any organisation. The extent to which these actions should also support sub-contractors working on forestry sites should be considered.

**Q8 - To what extent do you agree with priorities associated with this Strategic Objective?**

Agree slightly. These appear to be sensible corporate strategies but without further detail it is difficult to comment. Further information on how the "culture of continuous improvement and innovation" will be developed is needed.

**Q9 - To what extent do you agree with the activities associated with this Strategic Objective?**

Agree slightly. A review of skills held by existing staff and identification of gaps in technical knowledge to enable effective delivery of legal and regulatory duties is an important exercise. A review of user needs for felling permissions and processing of Forestry Grant schemes will improve client satisfaction and the efficiency of the system. A review of governance and framework will need to be a continuous process, particularly to align with changes in wider environmental governance at Scottish and UK levels.

**Q10 What do you think are the important areas we should include as we develop KPIs to measure performance against this Corporate Plan?**

- Targets underlying increasing the natural capital value of Scotland woodlands.
- Measures to assess ecological connectivity and development of woodland networks to assess how tree planting by multiple organisations, private estate and community woodlands are linked up. This could contribute to and be assessed using the Habitat Map of Scotland (HabMoS). Although figures are available for new planting which takes place, including publicly funded restocking, this only represents the area that received grant aid or that was delivered by Forestry and Land Scotland. Not all private sector restocking receives grant aid, so the reported figure does not represent the total area of restocking. It is essential that total tree planting figures are captured, including species data.
- An aspect that seems to be overlooked is ancient woodland. At present the extent and condition of ancient woodland is not clear as the ancient woodland inventory is outdated and of limited accuracy. Monitoring of the extent and condition of ancient woodlands in Scotland will enable the assessment of actions needed to restore these woodlands to a favourable condition. Against a backdrop of tree planting, the extent and condition of existing tree resources should not be forgotten.
- Determining how the Corporate Plan links to individual Habitat Action Plan targets, especially underrepresented woodland types such as wet woodlands e.g. Alder woods, tree-

line communities and montane scrub. Also, the consideration of priority species which Scotland has legal responsibilities to protect such as the Capercaillie, Red squirrel etc. There are a lot of useful guidance documents produced by Scottish Forestry. However, these need to be simplified and updated to improve the guidance for practitioners. It would be useful to have a target of re-visiting and updating these, raising awareness of them else well as making them easily accessible.

- Inclusion of ecosystem health indicators.

## **Equality and Diversity**

**Q11 Do you think any of the outcomes and activities in the Corporate Plan will impact differently on people who share protected characteristics? (for example, in relation to their age, disability, gender, pregnancy/maternity, marital status, gender identity, sexual orientation, race, religion or belief).**

No

**Q12 Are there any actions we should consider in relation to our outcomes and activities to ensure we are inclusive and advancing opportunities for people from different equality groups or for people from different socioeconomic backgrounds?**

Yes, greater consideration of urban tree planting so that small patches of woodland which are of great social and economic importance are protected and enhanced. This ties in with the Woodland Trust's aspiration that no person should live more than 500 metres from an accessible woodland of not less than 2 hectares.

Work could be developed with the Scottish Land Commission to consider community woodland schemes on vacant and derelict land. Also, consideration of how place-making and promotion of well-managed and accessible woodland and forest areas can link with Scottish Government priorities and health and wellbeing objectives.

## **Final comments**

**Q13 Please use this space to provide any other comments you think are relevant to the Corporate Plan.**

Would like information on how agroforestry will fit within Scottish Forestry's plans and how riparian planting will feed into wider catchment management, particularly with the onset of climate change and enhanced flood risk.