RESPONDEE INFORMATION FORM

Please complete the details below and return this form with your response. This will ensure that we handle your response appropriately:

Name:	Scottish Environment LINK (prepared by Mike Wood [RSPB] – Scottish Environment LINK Woodlands Task Force Co-ordinator)
Address:	Scottish Environment LINK 2 Grosvenor House Shore Road Perth PH2 8BD

Consultation: "Review of Land Managed by Forestry Commission Scotland"

1. Are you responding as:

an individual

on behalf of a group or organisation

✓	

2. Do you agree to your response being made public through the Scottish Executive Library?

Yes

No

✓		

Where confidentiality is <u>**not**</u> requested, we will publish your full response including your name (and address, where provided).

If you do not wish these personal details published, please tick this box:

3. Are you content for Forestry Commission Scotland to contact you again in the future for consultation or research purposes?

Yes

No

✓

SUMMARY OF QUESTIONS Please express your views below		
Name: Scottish Environment LINK (prepared by Mike Wood [RSPB] – Scottish Environment LINK Woodlands Task Force Co-ordinator) Organisations represented in this consultation response: • Butterfly Conservation Scotland • • Butterfly Conservation Scotland • Community Woodland Association • • • Council for Scottish Archaeology • Highland Birchwoods • • Plantlife Scotland • Royal Society for the Protection of Birds Scotland • Scottish Native Woods • Scottish Wildlife Trust • Woodland Trust Scotland • Woodland Trust Scotland • Moodland Trust Scotland • • Woodland Trust Scotland • Woodland Trust Scotland • • Woodland Trust Scotland • • Woodland Trust Scotland • • • • • • Woodland Trust Scotland • • • • • • • Woodland Trust Scotland • • • • • • • • • •	Address: Scottish Environment LINK 2 Grosvenor House Shore Road Perth PH2 8BD	

Question 1: We propose a vision for Scotland's national forests. This is that they will benefit everyone in Scotland, promoting vibrant and healthy communities, enriching natural environments and creating opportunities for economic development. Do you agree with this proposed vision? If not, what changes should be made?	 No, cultural heritage and landscape needs to be included. The vision for Scotland's national forest must also include delivery of the UK Biodiversity Action Plan (UKBAP) targets, Scottish Biodiversity Strategy as well as the Scottish Forestry Strategy. Priorities for Action for Forest Enterprise Scotland Forest Enterprise Scotland (FES) to improve the biodiversity condition of Scotland's existing native woodland, particularly for UK Biodiversity Action Plan (UKBAP) priority habitats and species. FES to increase their action on restoration of plantations on ancient woodland sites ('PAWS'). FES to increase their action on restoration of priority open-ground habitats that are currently forested. Any new woodland planting by FES must be where the total benefits (economic, social and environmental) to society are positive and where the benefits exceed those of alternative land uses. We support the Government's policy of expanding the area of woodland in Scotland, subject to three key conditions: That new woodlands are designed to provide public benefits, such as environmental enhancement and rural development; That an important focus for new woodland is the expansion and buffering of native and ancient woodland in order to increase the robustness of these habitats in the face of climate change; That care is taken to ensure that new woodlands are appropriately located, and that woodland planting and expansion does not occur at the expense of important open ground habitats, landscapes or species.
	The purpose of Forest Enterprise Scotland The Scottish Environment LINK organizations listed recognise that the primary focus of Forest Enterprise was initially the guarantee of timber supply, there is now a need for an up-to-date focus for the management of the 43% of woodland in Scotland ¹ . These 538,154ha should be better managed by FES for biodiversity and other non-market public benefits.
	through the Scottish Forestry Grant Scheme (SFGS),

administered by FCS, and the Scottish state forest, managed by FES. FE Scotland's duty, as well as that of FC Scotland, is to deliver government's multi-benefit forestry policy and European, EU and international commitments on biodiversity, sustainable development and timber procurement ² . FES must enhance its delivery of the UK Biodiversity Action Plan, Scottish Biodiversity Strategy, as well as the Scottish Forestry Strategy.
FES has an important role in demonstrating best practice for sustainable forest management across its estate. This includes deer management that protects and enhances public benefits ³ , such as native woodland condition improvement and measures that increase the range and population of UKBAP priority bird species, such as capercaillie and black grouse.
Public opinion ⁴ - 91% of adults in Scotland selected at least one public benefit as a good reason to support forestry with public money. The top reasons to support forestry were to provide places for wildlife to live, to provide places to walk in, and to help prevent greenhouse effect and global warming. Providing homes for birds and other wildlife and providing opportunities for walking were the benefits for which forestry performance was rated most highly. Interestingly only 7% of adults thought that the area of native woodland in Scotland had increased over the last 20 years, 49% thought it had decreased. 58% of adults would like more woodland in Scotland. Seven in ten thought it was very important to protect wildlife and habitats in Scotland – only 4% thought these habitats were well protected at present. The British public has shown an overwhelming wish for forests and woodlands to supply more than just timber, particularly access, recreation, conservation, soil protection and supply of non-timber products. ⁵ <i>Forest Renaissance</i> ⁶ clearly states the FE role in delivering multi-benefit sustainable forestry: 'The state-owned forest estate is the most effective and efficient vehicle to deliver many of the multiple benefits from forests', and comments on the inherent financial difficulties in the current FE timber business ethos: 'Changes in the global market mean that state forests are no longer profitable enough to support all other activities demanded by the public and politicians.'
The Scottish Environment LINK member bodies listed support the certification of the FES estate under the UK Woodland Assurance Standard (UKWAS) ⁷ , and its management in accordance with the UK Forestry Standard ⁸ .
The listed LINK member bodies support multi-benefit sustainable forest management, which must include greater emphasis on the delivery of access, recreation, biodiversity

² Such as the UNCED Rio and WSSD Johannesburg commitments on biodiversity, sustainable development and timber procurement, to the EU Birds and Habitats Directives, the MCPFE Helsinki Principles on sustainable forest management in the UK Forestry Standard, and the Global Strategy for Plant Conservation. ³ See: Hunt, J. (2003) *Impacts of Wild Deer in Scotland – how fares the public interest*? August 2003. Report for

WWF Scotland, Aberfeldy and RSPB Scotland, Edinburgh. ⁴ Forestry Commission (2003) *Public Opinion of Forestry 2003 – Scotland*. Forestry Commission, Edinburgh.

⁵ Garforth, M. & Dudley, N. (2003) Forest Renaissance – the role of state forestry in Britain 1919-2050: a discussion paper. Report for Forestry Commission, Edinburgh & WWF, Godalming. p.5.

⁷ UKWAS (2000) Certification Standard for the UK Woodland Assurance Scheme. UKWAS Steering Group,

Edinburgh. ⁸ Forestry Commission & DANI (1998) UK Forestry Standard - The Government's

Approach to Sustainable Forestry. Forestry Commission & Department of Agriculture Northern Ireland. ⁹ Graham, J. & McIntosh, B. (2003) Scottish Forestry Concordat. Scottish Executive Environment & Rural Affairs Department and Forestry Commission Scotland, Edinburgh.

	and leisure, with timber production as a subsidiary aim in many areas. The listed LINK bodies appreciate that many within Forest Enterprise Scotland are also moving in this direction, but we feel that rate of change could be increased across the FE estate. This requires a stronger steer from the Scottish Executive (SE) to its forestry department to deliver on its biodiversity commitments from the UKBAP, Scottish Biodiversity Strategy and the forthcoming Nature
	Conservation (Scotland) Act. The FCS Corporate Plan must ensure delivery of these key objectives by the state and private forest sectors.
	This also requires more effective joint working between FC Scotland and the SE Environment & Rural Affairs Department under the <i>Scottish Forestry Concordat</i> ⁹ , as well as Scottish Natural Heritage, to deliver integrated multibenefit sustainable land management.
Question 2: Should Forestry Commission Scotland do more to encourage local community involvement in the management of national	Yes, stakeholder involvement needs to be at local, regional and national levels. At present there is very limited opportunity for public involvement in the strategic priorities of forests at either a local or regional level.
forests? If so, how?	FES and FCS should inform and support communities, facilitate involvement and remove organisational obstacles. By doing this, a sense of pride in Scotland's forest estate, so far lacking, could be created .This needs to be delivered by a sustained change of culture throughout the FES. Local management should have a clear governance, accountability and transparency. This will take some time to implement so a realistic mechanism for this involvement should be developed. FES should implement innovative approaches to truly sharing control
	FE Scotland must ensure that national targets for the environment, biodiversity, cultural heritage and social benefits are properly integrated into FE strategic plans and forest design plans, regional woodland strategies ¹⁰ and local partnership working, including Local Biodiversity Action Plans (LBAPs).
Question 3: Should local communities be able to	Yes/No.
or other national forest assets) that are not identified as "surplus"? If so, what criteria should apply?	Scottish Environment LINK listed bodies prefer leasing, or partnership with FES, over community purchase, because public money should not be used to buy public-owned land in order to keep it in "public" hands.
	Communities might find it difficult in the long-term to fund forest management, especially if timber prices remain at their current level. Transferring financial responsibility to communities is not a desirable option – this will bring short- term income for the FES but might threaten important woodlands in the longer term if communities find they are unable to bear the financial burden. Condition of transfer of management that public benefit should be protected at a minimum or enhanced.
	FES needs to define and consult on what is 'surplus'. Management aims must be compatible with environmental, biodiversity and social strategies.
	Local communities should have the opportunity to take over

¹⁰ Existing local/regional woodland strategies plus the new regional versions of the Scottish Forestry Strategy announced in November 2003 (see: Forestry Commission (2003) *New Voices for Scotland's Forests*. News Release 6395, 10 November 2003. Forestry Commission, Edinburgh.)

	full responsibility for management of state owned woods – both 'surplus' and 'non-surplus' - as long as they can demonstrate that they can deliver greater public benefit. This would include responsibility for any natural and cultural heritage interest, including delivery of national as well as local targets. FES has a requirement to deliver national environmental targets, this must not be lost when land is transferred from public ownership.
	Public money should not be used to purchase or lease woods from the public estate.
	Communities may be able to develop better delivery of non- market benefits including woodland biodiversity, recreation opportunities, environmental education as well as rural development and urban renewal. Maintained public access needs to be part of a local community management.
	FCS needs to ensure that communities that purchase, lease or manage former FES land continue the UKWAS certification; this is vital for existing or potentially high biodiversity value woods, and those that will harvest non- timber as well as timber outputs.
Question 4: Should Forestry Commission Scotland seek to provide new opportunities for recreation in national forests in and around towns and cities? If so, how should priorities be	Yes, but care must be taken not to degrade existing high value woodland. As long as nature conservation interests are protected more people in urban and peri-urban areas should have the opportunity to enjoy the benefits of woodland recreation.
set?	FES should concentrate on developing partnerships with urban communities and existing urban forestry initiatives. This should be done in conjunction with improving the non- market benefit delivery of the existing FES estate, rather than the large-scale disposal of the rural state forest to directly finance the acquisition of a limited state urban forest.
	There is no real reason why FES acquiring and managing land should be the principal means of urban forestry delivery. There are existing projects non-FE projects that FC & FE could work in partnership with. FE already has an estate that requires improvement for social and environmental benefits. However, by working with other public bodies, such as SNH, Scottish Water and local authorities, areas can be identified which could be incorporated into the state forest in order to provide recreation and fulfil a number of Scottish Executive priorities.
	Priorities should be set according to delivery of non-market benefits across the existing FES estate, with positive impacts on UKBAP habitats and species, archaeology and cultural heritage, protection and enhancement of ancient woodland, and restoration of plantations on ancient woodland sites.
Question 5: Should Forestry Commission Scotland undertake a number of large- scale, long-term environmental projects (such as forest landscape restoration, or water	Yes, habitat work for UKBAP priority habitats and species, improving native woodland condition, restoring open-ground habitats, restoring PAWS and increasing area of native woodland in state forest, currently at 16%. This must be combined with a general improvement of forestry practice across the FES estate.
catchment or wilderness projects) on the national forest estate? If so, how should	Improving the biodiversity of retained non-native conifer plantations must take a secondary role to the restoration of native woodland and PAWS, and the restoration of open-

priorities be set?	ground habitats on the FES estate.
	Removal of forestry tracks in areas of wild land is a priority; this would greatly progress any 'wilderness project' aspirations.
	FES woodland should trail experimental stock grazing for biodiversity, such as butterfly conservation.
	Some large scale landscape restoration projects to create more natural forests should be undertaken, taking account of open-ground habitat networks, as well as for ecologically- valid forest habitat networks. Landscape scale vision and action is crucially important, such as recreating montane scrub as well as native woodland networks.
	Some large scale landscape restoration projects to create more natural forests should be undertaken, taking account of open-ground habitat networks, as well as for ecologically- valid forest habitat networks. Landscape scale vision and action is crucially important, such as in recreating montane scrub as well as native woodland networks. Landscape scale action increases the core area of woodland habitats increasing their robustness in the face of the threat of climate change.
	More work should be done in identifying and managing where it is appropriate to clear woodlands off cultural landscapes and to identify where it may be more appropriate to recreate historic woodlands with distinctive sustainable woodland management.
	With the introduction of Land Management Contracts from 2005 FCS and FES must identify processes where forestry can be more closely integrated with farming policy, not just in the management and creation of wood pasture.
	This vision is the key to expanding available habitat through habitat expansion/improvement and establishment of appropriate buffer zones for plant species and ancient woodland. It must deliver for UKBAP priority species and habitats, the Important Plant Areas project ¹¹ as well as the SFGS funded SNH/FCS 'Forest Habitat Network' concept.
Question 6: Should Forestry Commission Scotland become more ambitious in its environmental work on the national forest estate, including – in particular – delivery against Biodiversity Action Plans, improving the	Yes - priorities set according to UKBAP priority habitats and species targets, including protection and restoration of native and ancient woodland and PAWS. The work of the FES should be underpinned by UKBAPs. FES should not be doing anything that is contrary to enhancing/protecting biodiversity.
biodiversity of conifer forests and enhancing the contribution that national forests make to Scotland's landscapes? If so, how should priorities be set?	 Restructuring to create buffer zones/migration routes for UKBAP plant species between ancient woodland or other source areas. Increasing the core zones of areas of ancient woodland in order to protect against edge effects and the impact of climate change Increasing area of native woodland managed by FES Increased restoration of FES's PAWS.
	 Demovel of trace from priority apon ground hebitate

[•] Removal of trees from priority open-ground habitats.

¹¹ JNCC, Plantlife International & Royal Botanic Gardens Kew (2004) *Plant Diversity Challenge: the UK's response to the Global Strategy for Plant Conservation.*

	Removal of trees from significant cultural heritage
	 sites and landscapes. Restructuring for UKBAP priority species, such as black grouse, chequered skipper and pearl-bordered fritillary. Improving biodiversity condition of native woodland. Biodiversity condition monitoring of UKBAP priority habitats and species on FES land.
	FES has a role in demonstrating best forestry practice for biodiversity across the whole of its estate and, in order to ensure delivery, targets should be set on the above work areas.
Question 7: Should Forestry Commission Scotland do more to recognise and conserve the cultural heritage value of the national forest estate? If so,	Yes, there is increasing public recognition of the cultural heritage value of the national forest estate. The three key principles are <i>identification</i> , <i>protection</i> and <i>enhancement</i> and for these more work needs to be done by FES.
national forest estate? If so, how should priorities be set?	A full survey and management plan should be required of all forest holdings as part of the planning process. Consultation with local authorities and Historic Scotland would help in prioritising areas with significant archaeological and cultural heritage interest. This should include ancient woodland and PAWS as habitats of historic importance.
	In addition, all state forest sites should have forest design plans which can be reviewed at regular intervals, perhaps every 5 years, and consulted upon similar to SFGS applicants.
Question 8: What emphasis should be given to the	Low - less than its is given at the moment.
strategic role of national forests in the supply of timber to Scotland's wood processing industries? What are the priorities?	We question the 'strategic' nature and need of FCS's role in timber supply (see response to q.11). Timber is a by-product of delivering public benefits with public money. Public money spent on owning and managing a state forest must be used to secure non-market public benefits.
	The dominant production model of low-intensity - but not low environmental <i>impact</i> - silviculture, whilst apparently maximising yield and capital investment, minimises forest employment, local benefit and delivery of social and environmental goods.
	It should be accepted that for the foreseeable future the national forests are likely to have little economic value, and therefore a change in emphasis is needed towards production of quality timber as opposed to large quantities of poor timber. This would require a more intensive management regime – FES has an important demonstration role in making this compatible with a further shift in focus towards the environment, native woodland and recreation.

and developing local environmental as well as social benefits. The legacy of large scale management of exotic conifer plantations means that there is a serious public benefit to be provided from the support of smaller-scale forestry based rural development. In relation to the Scottish Forestry Strategy strategic direction 'to help communities benefit from woods and forests'? it is important to note that well managed woodlands for biodiversity can generate economic opportunities and an improved skills base. Question 10 (a): Should there be a more dynamic approach See also response to Qs 2 & 3. Question 10 (a): Should there be a more dynamic approach to environmental quality of the national forest estate? Yes. FES needs a more strategic rather than dynamic approach to environmental quality of the national forest estate? Question 10 (b): In what circumstances should land be added to the national forest estate? What criteria might be applied? Yes. FES needs a more strategic rather than dynamic appropriately planted, and must therefore also be allowed in the private sector. Question 10 (b): In what circumstances should land be added to the national forest estate? What criteria might be applied? 1. When public ownership is the only, or best way, to secure public benefits. We believe that land should be added to the national forest estate? See also area of the country should not be developed at the expense of any other. 2. FES land purchases should be usubject to transparent criteria developed with the approval of a wide range of stakeholders. See also 10 (c): In what circumstances should hat and towadiant to woodiants. This musch be against UKBAP targets.		
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	circumstances should national forest estate land be sold? What criteria might be	If a decision is made to sell public forest, public funds should not be used in the purchase, and a condition of sale should

¹² Scottish Executive & Forestry Commission (2000) *Forests for Scotland – the Scottish Forestry Strategy.* Forestry Commission, Edinburgh.

Question 11: In what circumstances should there be a radical re-appraisal of management options in national forests, for example in relation to wood production objectives?	 Now – because there are higher priorities for a broader mix of management objectives, combined with a 30 year low of timber prices¹³. Radical reappraisal is required now. See also responses to Qs 7, 8, 9 & 10. The management priorities of the national forest in Scotland should be changed to primarily provide public benefit. This should include natural, cultural and social benefits. The Scottish Environment LINK listed bodies question the need for continued 'strategic' nature of FES's role in timber
	supply using public money. Timber should be a secondary priority for FES, a by-product of the delivery of public benefits. We are concerned that FES has a low proportion of its land holding as native woodland.
	Abandonment of plantations is a risk for archaeological sites where wind throw might cause significant root damage. Withdrawal from forestry could provide an opportunity for restoration of open-ground habitats – FES must provide a lead in good practice, carrying out high quality work.
	FES must lead the development of good practice for non- timber products, working with other UKWAS certified owners.
Question 12 (a): Do you have any views on the creation of a challenge fund for special projects aimed at significantly	It would be better for the national forest estate as a whole if public benefits were included in all land management decision-making and planning.
increasing public benefits from the national forest estate?	FES must deliver for UKBAP targets, native and ancient woodland and restore its PAWS – this requires a strategic corporate commitment backed up by a funded action plan, rather than competitive funding of <i>ad-hoc</i> projects.
	This should be considered in parallel with changes to the Scottish Forestry Grant Scheme (SFGS). Such funding should be for application across Scotland, not just the competitive funding of areas of state forest land.
Question 12 (b): Should this be funded in part by any ring- fenced income derived from the sale of national forest	It would better for the national forest estate as a whole if public benefits were included in all land management decision-making and planning.
estate assets?	Sales should continue under the conditions of the Forestry Acts, including the operation of the Forestry Fund. Any sales need to aid the delivery of the Scottish Forestry Strategy and the Scottish Biodiversity Strategy. A condition of sale should be the protection and enhancement of public benefits.
	Any proposed changes to UK forestry legislation need careful consideration and must look wider then the operation of FES.
Question 13: How should Forestry Commission Scotland take forward its approaches to working in partnership in order further to develop the national forest estate?	The Scottish Environment LINK listed bodies welcome FES increasing stakeholder involvement. There is scope to increase partnership working with local communities, public bodies, councils and NGOs, to better deliver environmental and social benefits.
Question 14: How should the national forest estate be used to take forward wider	FES has an important role in demonstrating best sustainable forest management practice across its estate. This requires wide-scale improvements in FES's current forestry practice,

¹³ Forestry Commission (2003) *Coniferous Standing Sales Price Index*. 20 November 2003. Economics & Statistics, Forestry Commission, Edinburgh.

Executive priorities, for example in relation to renewable energy, rural housing, health and tourism?	not just on exemplar environmental or social demonstration sites. FES must pioneer woodland management techniques, particularly for meeting multi-benefit needs through environmentally low-impact silviculture.
	The state forest estate could have an important role in implementing a national flood management strategy, by establishing flood plain woodlands that meet UKBAP wet woodland Habitat Action Plan targets. This would have to connect with open-ground habitat restoration and retention, as well as SFGS support for existing, as well as new, riparian woodlands.
	FCS in association with SEDD, needs to write guidance on siting wind-farms and associated forest management for biodiversity. FCS & SE must produce revised guidance ¹⁴ to facilitate the proper development of new regional woodland strategies ¹⁵ that promote action at a landscape scale and protect designated nature conservation sites and archaeology, enhance native woodland biodiversity, deliver UKBAP targets and restore PAWS.
Question 15: How should we ensure that everyone is aware of what Scotland's national forests have to offer?	 By effectively delivering on sustainable forestry and biodiversity commitments. Improving the quality and extent of environmental interpretation and education on the FES estate.
Question 16. Given the long- term nature of forestry, the proposed vision will largely be delivered through gradual,	Yes. There is a need to develop and consult on a detailed options appraisal for the Scottish state forest, managed by FES, Scottish Natural Heritage, Scottish Water and other public bodies.
evolutionary change. Is there a need for a more rapid approach to bring about some elements of the vision and, if so, what are they?	This should renew and expand FES and SNH's commitment to deliver improvement of the biodiversity quality and extent of Scotland's native and ancient woodland, and open- ground habitats.
	This must be done in conjunction with the 2005 review of the Scottish Forestry Strategy and implementing the Scottish Biodiversity Strategy and UK Biodiversity Action Plan.
	However, there are also more urgent tasks - such as the restoration of PAWS, improvement in native woodland condition and action for UKBAP priority habitats and species - which will achieve a number of goals as set out in this paper.

¹⁴ Updating: Scottish Executive Development Department (1999) Circular 9/1999 Indicative Forestry Strategies.
SEDD, Edinburgh.
15 Forestry Commission (2003) New Voices for Scotland's Forests. News Release 6395, 10 November 2003.
Forestry Commission, Edinburgh.

Question 17: Is it useful to try to express the proposed vision in more detail, perhaps quantifying the size, mapping the geographical distribution and describing the nature of Scotland's national forests at some date in the future (say 2025, or 2050)? If so, how should this be done?	Refer to answer to Q.16.
Question 18: What approaches might be adopted to strike a balance between local and national interests? Any Additional Comments:	Refer to answer to Q.16 and below. Scottish Environment LINK listed bodies support enhanced environmental benefits to the local communities that meet regional and national environmental targets, such as the UKBAP and Scottish Biodiversity Strategy. Scottish Environment LINK listed bodies are concerned that this review only considers the role and function of Forest Enterprise Scotland and not Forestry Commission Scotland, or the state forest managed by Scottish Natural Heritage. This consultation should have encompassed the regulatory, advisory and grant funding aspects of Forestry Commission Scotland – since April 2003 the Scottish Executive's forestry department. We are also concerned that this process has pre-empted the 2005 review of the Scottish Forestry Strategy.
	The Scottish Executive needs to ensure that FE and FC Scotland will clearly deliver Scottish Biodiversity Strategy commitments, apply Strategic Environmental Assessment ¹⁶ to FE Strategic and Forest Design Plans, and to FC Scotland's role in the development and implementation of regional woodland strategies. The proposed Nature Conservation (Scotland) Act will require FE & FC Scotland to deliver biodiversity commitments. The Scottish Environment LINK listed bodies believe that there is significant potential to increase the environmental, social and economic benefits provided by Scotland's public and privately owned woodlands.

END OF CONSULTATION RESPONSE

¹⁶ Partnership Executive (2003) *A Partnership for a Better Scotland - Partnership Agreement.* May 2003, Scottish Partnership Executive, Edinburgh.