

Forestry and Land Scotland Corporate Plan Consultation Response – Scottish Environment LINK

10 July 2019



Summary of recommendations

FLS must set out more clearly how they will be leaders in managing the public forest and land estate for the good of the Scottish people. Whilst we welcome some specific commitments, the draft Corporate Plan lacks ambition and fails to set out how FLS will be transparent in its decision-making processes.

Vision

- Following the subsequent declaration of a climate emergency and the wide recognition of an ecological emergency, FLS must demonstrate how its Vision has evolved in this context.
- The Mission should state an ambition to lead progressive sustainable forest creation and management. With both the Mission and Vision already in use on the website, we need guarantees that both remain subject to change following consultation.

Biodiversity

- We believe a **biodiversity action plan** should be developed to accompany the Plan, with regional action plans developed to better identify local pressures, opportunities, and stakeholders, including communities.
- We welcome the commitment to review deer management and landscape-scale management. There should be firmer and clearer commitments to apply the Land Use Strategy to these goals.
- FLS should champion best practice in managing invasive non-native species and biosecurity, on and off the national forest and land estate

Climate and ecological emergencies

- The declaration of a climate emergency and the existence of an ecological emergency should inform the development of the final Plan, accepting the declaration came after this draft publication.
- The Plan should clarify how the 2045 net-zero target, and the essential role of forestry specified in the same report, will inform the strategy.
- The Plan should identify the ways in which FLS will manage the national forest and land estate to contribute to carbon sequestration and how carbon sequestration potential can be best realised while taking account of biodiversity enhancement and restoration.
- Essential relationships between habitat diversity, biodiversity, and natural climate solutions, especially given the importance of forestry and peatlands, should be central to forestry planning.

Indicators

- We would welcome the publication of the proposed indicator set or, alternatively, the process by which these will be developed. We propose a range of biodiversity indicators while outlining the need for a consistent carbon sequestration indicator.

1. [Scottish Environment LINK](#)ⁱ is the forum for Scotland’s voluntary environment community, with over 35 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society. LINK provides a forum for these organisations, enabling informed debate, assisting co-operation within the voluntary sector, and acting as a strong voice for the environment. LINK works mainly through groups of members working together on topics of mutual interest, exploring issues and developing advocacy to promote sustainable development while respecting environmental limits.
2. LINK members are grateful for the opportunity to respond to the Forestry and Land Scotland (FLS) Corporate Plan (“the Plan”). We welcome the commitments throughout to conserve and restore biodiversity and act on climate change.
3. We do, however, note the public use of parts of the consultation draft on the website – the Vision and Mission statements in particular. As charities, responding to consultations makes significant use of valuable and vanishing resources. There is little use in consulting on aspects that have already entered the public discourse. We would welcome guarantees that this time and effort is not spent consulting on something that has already been concluded.

Biodiversity and nature protection

4. The 2016 interim report on Scotland’s progress towards the binding Aichi Biodiversity Targets set by the UN Convention on Biological Diversity outlines that:

Scotland’s biodiversity indicators, the condition of notified habitats and species on protected areas, and progress towards meeting Scotland’s biodiversity targets demonstrated that biodiversity loss had not yet been halted and would require renewed and sustained effort over a longer period.

5. Gail Ross MSP [recently highlighted](#) that:

It is clear that our response to those [climate and biodiversity] challenges must be twofold: we need to consider what we can do now to stop further losses from current practices and what can be done to restore habitats that have been degraded by what has happened in the past.ⁱⁱ

6. LINK therefore welcomes the language of ecosystem ‘restoration’ used throughout, noting this goes further the UK Forestry Standard minimum of ‘maintenance’.
7. We also welcome the commitment to looking after the historic environment assets of FLS.
8. Similarly, the pragmatic stance taken on page 15 of the draft Plan that recognises the “requirement for economic growth” is “resulting in increasing demands and pressures on the natural world” is a welcome reflection and a strong foundation for recognising environmental limits.
9. We believe the recognition in section 6.2 of the Plan that “Our environment underpins everything we do; we could not deliver community and economic outcomes without a healthy environment” is an essential grounding for the relevant outcome, and indeed the Plan overall.

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10. To contend with the scale of the crisis, however, we believe a biodiversity action plan should be developed to accompany the Corporate Plan, with regional action plans developed to better identify local pressures, opportunities, and stakeholders.
11. Woodland ecosystems, including open spaces, soil functionality, species and genetic diversity, and connected habitats are essential to delivering multiple benefits. These include recreation, physical and mental health, wellbeing, and cultural heritage. Their importance should be more central in the Plan, whose focus on production risks glossing over these fundamental features of forests.
12. Organisationally, FLS procurement should be informed by best practice with regards to environmental impacts. Any built development on the FLS estate should demonstrate leadership in low-impact construction and materials. It needs to be sensitive to landscape impacts on wildness, and local impacts on biodiversity.

Climate and Ecological Emergencies

13. Since the publication of the draft Plan, the Scottish Government has declared a climate emergency, while the First Minister has [recognised](#) that the biodiversity crisis “is as important as the challenge on climate change”ⁱⁱⁱ. Similarly, as Deputy Convener of the Rural Economy and Connectivity Committee, Gail Ross MSP, [recently outlined](#),

Today, we are tackling both a climate crisis and a biodiversity crisis that were started many generations ago and that have only increased in severity through decades of intensified industrial production and global economic expansion.^{iv}

14. Owing to these developments since the publication of the draft Corporate Plan, LINK is keen to see how the declaration of a climate emergency and the existence of an ecological emergency will inform the development of the final Plan.
15. In particular, it should clarify how the 2045 net-zero target, and the essential role of forestry and peatland specified in the same report, will inform the strategy.
16. The ecological and climate crises are intrinsically interlinked, providing a strategic framework for action that this Plan should take greater consideration of. As Francesca Osowska, Chief Executive of Scottish Natural Heritage, [points out](#), “a nature-rich future is our best insurance against the climate emergency.”^v
17. Whilst specific targets were not expected, we were disappointed at the lack of identification of the ways in which forestry and woodland ecosystems currently contribute to carbon sequestration and, more importantly, how carbon sequestration potential can be best realised while taking account of biodiversity enhancement and restoration.
18. LINK call for the Plan to recognise the essential role of natural climate solutions, especially given the role of forestry and peatlands, and outline how FLS will contribute to these discussions and lead practical implementation on the national forest and land estate.
19. [Mapping](#) conducted by RSPB^{vi} has recently shown the contribution that Scotland’s soils, vegetation (especially forestry), and peatlands make to carbon sequestration. The mapping clearly shows the

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correlation between biodiversity hotspots and intensity of sequestered carbon. This should inform a joined-up approach to biodiversity restoration and enhancement, and action on climate breakdown.

Indicators

20. LINK notes that the Plan has not included the indicator set by which the achievement of its aims and objectives might be measured. Nor is the development of an indicator set an explicit consultation question.
21. We would therefore welcome the publication of the proposed indicator set or, alternatively, the process by which these will be developed.
22. For biodiversity goals, the indicator set should adopt, as a minimum, the [ecosystem health indicators^{vii}](#), especially those pertaining to [native woodlands^{viii}](#).
23. More specifically, the Plan should include the following indicators:
 - a. Area of National Forest Estate's native woodland resource in acceptable condition according to the NWSS' native woodland condition indicator values, or a comparable metric – with a breakdown of the ancient woodland component of this.
 - b. Area of NFE PAWs sites under active restoration, with a route to 100% by a fixed date.
 - c. Area of priority open habitats under active restoration, with a route to 100% by a fixed date.
 - d. An audit of the area of ancient woodland lost from the NFE year on year.
 - e. A measure of the length of paths, forestry roads, and tracks through the NFE.
 - f. Population status of SBS priority species occurring on the national forest and land estate, with trends improving over time.
 - g. Area of INNS cleared from the national forest and land estate and adjacent land.
24. In addition, in order to contend with the climate emergency, the Plan should adopt a consistent approach to measuring progress on carbon sequestration among FLS's forestry and land. We believe this is essential for transparent, accountable action on climate change.
25. To contribute to the 2045 net-zero target, carbon sequestration should not be used as an offsetting tool in markets or for FLS's operational emissions – both emissions reductions *and* sequestration are essential. Natural climate solutions should not enable business-as-usual.
26. Native woodland extent and condition are becoming increasingly relevant to policy aims (including carbon sequestration and biodiversity), but the NWSS is out of date and some of its assumptions about the acceptability of some key influences on condition are now better informed and no longer stand up to scrutiny (for example, herbivore impact).

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27. An up-to-date overview of native woodland condition would provide a valuable indicator for policy priorities on carbon, biodiversity and the availability of multi-benefit, sustainably usable forestry for rural development

“Outcome 1: Supporting a Sustainable Rural Economy “

28. The outcome as it appears in the draft Plan should be reworded to include “sustainable” in front of “business growth”, as growth in itself is not an appropriate indicator of public benefit or sustainability.
29. It is of concern that the status of FLS as a Public Corporation may result in income generation becoming a primary focus for the agency. This outcome must be carefully monitored to ensure that delivery is ecologically sustainable, as well as economically beneficial.
30. We note that “improving productivity” is a priority but are concerned by the extent to which it is privileged above other important outcomes. It is not the responsibility of the Scottish Government to support private businesses through the provision of raw materials, instead the national forests and land should be managed in a way which benefits all of the people of Scotland through the provision of public goods, such as biodiversity and flood prevention.
31. We believe this outcome can and should be more ambitious. More emphasis should be given to approaches which offer ways of mitigating and adapting to the ecological and climate crises, for example a shift away from reliance on Sitka spruce towards greater use of native broadleaf species in a productive capacity, and the development of appropriate infrastructure to make this an economically viable approach. This will be beneficial to biodiversity and will help with the long-term sequestration of carbon in mature native woodland and in hardwoods which can be used for high quality timber (with a longer product life). As shown in fig. 1, existing carbon stores correlate with existing biodiversity hotspots.
32. Woodlands and open ground can be important for local tourism, recreation, and aesthetic enjoyment. Road and track construction and maintenance should therefore be better engaged with local community concerns and should be committed to following best practice in their construction.
33. We welcome the acknowledgements of the roles that sustainably managed forestry can play in diversifying income streams, such as agricultural management. We would expect that exemplars of agroforestry and small-scale woodlands be developed on the public estate. These deliver multiple benefits and would demonstrate a commitment to the principles of integrated land use, as set out in the Land Use Strategy.
34. Agroforestry has proven benefits in both livestock and cropping systems, delivering up to 40% additional biomass from the same area compared to grass or cropping systems. It provides shade, shelter and browse for grazing livestock (with attendant benefits for health and, through the tannins in tree leaves, potential reductions in methane emissions). In cropping systems, it can provide an additional crop of fruit and/or timber as well as habitat for predators and a reduction in wind speed for crops. Agroforestry systems tend to increase on-farm biodiversity and can also help with water management and can provide woodchip as a viable alternative to bought-in straw for animal bedding.

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“Outcome 2: Looking after Scotland’s national forests and land”

35. We commend the recognition that both climate breakdown and the national emphasis on economic growth are increasing pressure on the natural world. This tension needs to be appreciated throughout environmental policy making.
36. We believe the final Plan should commit to producing a Biodiversity Action Plan with regional action plans developed to better identify local pressures, opportunities, and stakeholders.
37. Improving the existing condition of the national forest and land estate’s native woodland should be explicitly stated as an action. From an established baseline such as the NWSS (2014).
38. Securing and expanding the National Forests Estate's montane woodland resource should be a clear priority from a biodiversity, ecosystem function and ecosystem services viewpoint.
39. More clarity is needed on FLS’ plans for the management of their significant non-forested land.
40. We welcome the specific recognition of the need to protect and enhance biodiversity and the commitment to ecosystem and landscape scale approaches. We would expect to see greater reference being made to the Scottish Government’s commitment to the delivery of national and international biodiversity targets, and more reference to the role that FLS can play in delivering specific species and habitat objectives. This includes action to restore inappropriately forested sites, and clearer links to other important Scottish Government plans, policies and strategies such as the Peatland Action Plan.
41. We would like to see explicit support of the Atlantic Woodland Alliance in the key actions here.
42. There should be a revision of the clause “Scotland’s national forests and land are looked after...”, as it’s unclear what this means in practice, and is thus open to interpretation. Instead, we would welcome a more qualified, tangible, measurable and thus accountable target.
43. We welcome the action to collaborate with partners on integrated landscape scale approaches to habitat management and restoration. This action should be expanded to make it clear that habitat restoration can include both native woodlands, and inappropriately forested open habitats such as peatlands and heathlands.
44. We would welcome greater commitments on invasive non-native species and biosecurity. FLS should champion best practice in these areas.
45. We recognise that prior to the formation of Forestry and Land Scotland, Forest Enterprise Scotland were sectoral leaders in deer management. We challenge FLS to continue to lead on deer control, maintain existing commitments to the use of non-lead ammunition and to move towards the creation of a “fenceless deer environment”.

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“Outcome 3: National forests and land for visitors and communities”

46. We are very pleased to see this as one of the corporate plan’s five outcomes as we believe that the opportunities for visiting and enjoying recreation within the national forests make a significant contribution to the health and wellbeing of people in Scotland.
47. We note that the strategy says that “FLS aims to be Scotland’s leading informal outdoor recreation manager” which we strongly support. It then goes on to state that this will be achieved by “providing high quality visitor facilities and experiences whilst being a champion for outdoor access and use for improved health and wellbeing”.
48. We certainly welcome and support these commitments. However, we would like to take this opportunity to suggest that if FLS is aiming to lead in outdoors management, it would be helpful to see more commitment to proactively undertake that leadership role.
49. Given the reduction in local authority funding for access staff and ranger services in recent years, we believe that there is a key role for FLS to explore innovative ways of dealing with longer term issues relating to visitor management, which affect many parts of Scotland. This learning could then be shared more widely with other land owning and visitor managing bodies, as well as the wider forestry sector. These issues could include the following:
 - a. creating paths and trialling use of surface materials, gates, use of grading schemes and waymarking which aim to make the paths inclusive for all users;
 - b. developing a sustainable model of providing low cost, informal camping sites in areas where roadside camping is popular but there are no campsites;
 - c. trialling ways of providing low-impact facilities for motor homes and campervans;
 - d. testing ways of creating income from parking charges which is then spent entirely on visitor facilities and which doesn’t unfairly impact on those who are making multi-day trips or who live locally;
 - e. trialling ways of dealing with litter and other anti-social behaviour in rural areas;
 - f. trialling best practice in the use of fencing and in wider deer management with regard to removing impediments to access;
 - g. developing and implementing robust policies in forest design to ensure that new or replanted areas of forestry take access fully into account, and that best practice is followed in all aspects of recreation management during forestry operations;
 - h. ensuring that such policies are influencing the wider forestry industry to improve the practice across the whole sector.
50. We support community participation in the planning and management of woodland. Developing regional actions plans as part of a Biodiversity Action Plan should actively incorporate local communities.

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51. This section could make more reference to biodiversity, as there is great scope for community led environmental projects to be delivered on the national forest and land estate. We would expect that the Communities Strategy will ensure environmental outcomes can be successfully delivered, and that the focus is not solely of economic activity.
52. We note the action regarding engaging communities in decision making. A clear plan for how this can be achieved in a strategic manner should be developed, allowing communities to help decide what land is going to be used for, and where this land is. This will help to reduce some of the negative impacts of large-scale forestry in areas which are already heavily afforested. The Communities Plan should set out how communities will be properly consulted and engaged from the earliest stages of the woodland creation process, right through to the management of felling and timber processing.

This response was compiled on behalf of the LINK Woodland Subgroup and is supported by:

Amphibian and Reptile Conservation Trust	Ramblers Scotland
Buglife Scotland	RSPB Scotland
Butterfly Conservation	Scottish Wildlife Trust
Froglife	Scottish Wild Land Group
John Muir Trust	SCAPE Trust
North East Mountain Trust	Trees for Life
Nourish Scotland	Woodland Trust Scotland
Plantlife Scotland	

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www.scotlink.org

www.savescottishseas.org

www.fightforscotlandsnature.scot

References

ⁱ <http://www.scotlink.org/>

ⁱⁱ Meeting of the Parliament 13 June 2019, motion “World Environment Day”.

http://www.parliament.scot/parliamentarybusiness/report.aspx?r=12183&mode=html#iob_110058

ⁱⁱⁱ <https://www.snhpresscentre.com/news/not-too-late-to-act-for-climate-change>

ⁱⁱⁱ Meeting of the Parliament 09 May 2019. <http://www.parliament.scot/parliamentarybusiness/report.aspx?r=12083>

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^{iv} Meeting of the Parliament 13 June 2019, motion “World Environment Day”.

http://www.parliament.scot/parliamentarybusiness/report.aspx?r=12183&mode=html#iob_110058

^v <https://www.snhpresscentre.com/news/not-too-late-to-act-for-climate-change>

^{vi} “Nature helps our fight for a safe climate”.

<https://rspb.maps.arcgis.com/apps/Cascade/index.html?appid=2b383eee459f4de18026002ae648f7b7>

^{vii} <https://www.environment.gov.scot/our-environment/state-of-the-environment/ecosystem-health-indicators/explore-ecosystem-health-indicators/>

^{viii} https://www.environment.gov.scot/data/data-analysis/ecosystem-health-indicators/?indicator=Native_woodland

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