

Scotland's Forestry Strategy 2019-2029 – A Consultation Draft

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Scottish Environment LINK

Phone number
Address

01738 630804

13 Marshall Place, PERTH

Postcode

PH2 8AH

Email

charlesdundas@woodlandtrust.org.uk

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Response to the consultation on Scotland's Forestry Strategy 2019-2029 – A Consultation Draft



Date: 29 November 2018

INTRODUCTION

Scottish Environment LINK welcome the opportunity to comment on this vitally important strategy for the future of a significant land use across Scotland

However, our first observation has to be that this draft strategy has not reviewed the progress made and lessons learned from the existing Scottish Forestry Strategy 2006. New business models to supply markets with a range of local timber products from multi-benefit forests are being explored and are in need of support in areas where they could make a real difference to fragile rural economies. Meanwhile, the long-standing tensions between people with different forest and woodland interests continue to inhibit progress towards land use integration.

The current Scottish Forestry Strategy has a series of “themes”, which identify current issues and challenges. Importantly, each theme section also outlines ways in which these challenges can be addressed and how action will be monitored. Such steps are missing from the current draft strategy, which is of serious concern. Most notably absent from this Strategy are SMART outcomes - in its current format it is almost impossible to assess progress towards delivery of objectives and vision. It also requires a commitment to delivery, either within the strategy itself or in a standalone delivery plan. Our preference would be for delivery mechanisms to be incorporated into the strategy, accompanied by time bound targets and appropriate measures of progress.

Unless actions can be incorporated into this strategy we therefore call for a follow-up Action Plan, developed in consultation with stakeholders who can advise and assist with the delivery of the strategy.

The Strategy needs to reflect best practice international standards. Other countries are moving towards increasing the native woodland component of their forestry, and are also moving away from large scale clear felling to more continuous cover type approaches to silviculture. The challenge of growing commercial trees in our climate is cited as reason for continuing with the current model of commercial silviculture, however we feel that this means that we should be moving towards more native tree based systems as they are doing in South West Norway (the main place where they have a similar sitka spruce-based industry to us).

Sustainable Forest Management and certification

The Scottish Government is right to adopt the 1993 “Helsinki” definition of SFM. However, we would be keen to see the narrative around this stress that the Scottish Government’s approach to SFM goes beyond maintaining biodiversity as it exists, but aims to enhance the contribution of our forests and future forests to Scotland.

The United Kingdom Forestry Standard (UKFS) also currently commits only to 'maintaining biodiversity', and continued parity with this ambition would maintain Scotland's existing biodiversity trends, which, overall, is net-negative. We consider UKFS to be the bare minimum in terms of sustainable management, and Scotland should aspire to higher standards. 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.”

The UKFS requires that devolved administrations commit to its principles as a minimum; there are no legislative reasons for not going further than the baseline requirement, especially given its failure so far to tackle the overall biodiversity decline

Clearly, much of our existing forestry practice does not meet UKFS levels yet, most obviously through the damage caused by some plantation woodlands to other ecosystems.

The strategy is founded upon the principle of Sustainable Forest Management, as such we believe that certification should be one of the major issues covered by this strategy. The main mechanism proposed in the strategy to ensure SFM is compliance with UKFS. Whilst this standard does go some way to meeting the requirements of SFM, it is our opinion that **UKFS in itself is insufficient to fully ensure SFM is delivered in Scotland**, particularly ensuring that forestry activity **does not cause damage to other ecosystems**. Whilst, the Scottish Government has a Duty to further biodiversity conservation set out in the Nature Conservation (Scotland) Act.

Although it is widely accepted that the UKFS is the standard by which forestry applications are assessed, its interpretation varies between assessing officers and there is little to no monitoring or reporting on its implementation. As the majority of the UKFS is made up of “guidelines” caveated “requirements” which only apply “when appropriate” or “should be considered”, it is exceptionally difficult to secure protection for biodiversity through UKFS alone.

Building on UKFS, the UK Woodland Assurance Standard (UKWAS) is a voluntary, independent certification standard for verifying sustainable woodland management in the UK. This certification scheme gives assurances to buyers of UK timber and timber products that is has been sourced from sustainably managed woodland.

We are pleased that 58% of Scotland's forests were certified against UKWAS in 2018 and we'd want to see that percentage grow in the future. Given that most of the Public Forest Estate is already certified, most growth would have to come from the private sector, so **we would like to see a feasibility study done into whether that percentage of UKWAS certified woodland could be pushed up to around 70%.**

For all proposals for new woodland planting, we would encourage Scottish Government to look for evidence that the planting has been designed with a view to later meeting the requirements of FSC forest management certification set out in

UKWAS, and that owners/managers have embraced the principles of environmentally appropriate, socially beneficial, and economically viable management.

Also, as the strategy is based so heavily on the ideas of modern, sustainable forestry, it is only as strong as the implementation and enforcement of design standards. We have seen many examples recently that suggest that these standards can slip. This can happen at many stages in the planting process and for many reasons, including rushed timescales due to the grant system, poor communication between designers and contractors, lack of skills or a belief that lapses will either not be detected or not have consequences. Heavy grazing pressure from deer can also mean that well designed and planted schemes can end up with only the most resistant trees left.

CONSULTATION QUESTIONNAIRE

Q1. Do you agree with our long-term vision for forestry in Scotland? Please explain your answer.

It is generally good, but we **do not agree with it in full** as we believe there are some elements missing.

We believe that in order to bring more of Scotland's forest management into line with the definition of SFM, the vision should outline what a future balance of forestry which will deliver sustainable forest management looks like on the ground, i.e. a move towards a more native tree rich-balance.

Also, this vision does not adequately take into account the legacy of sites which have been inappropriately afforested in the past (for example, priority peatlands, unimproved and semi-improved grasslands, heathlands and coastal habitats).

The vision requires expanding to fully acknowledge the importance of biodiversity, distinct from "the environment". Biodiversity is an important issue, underpinning ecosystem services and requiring consideration as a distinct entity from the wider "environment".

It is unclear what is meant by the term "resilient" in this context, and the term is not defined in the glossary. "Resilience" is an ambiguous term and can have various meanings. We suggest that "resilience" is defined in the glossary, or is prefixed in the text with "ecological" or "economic", depending on the context of the text. We would hope that the intention here is ecological resilience.

None of the vision can be achieved without integrated partnership working – as the Cabinet Secretary says in his introduction, the notion of land interests having to compete against each other is a dated one which we must try to move beyond (whilst recognising that there is a lot of work to be done to achieve that). We appreciate that this is included in the explanation of the vision which follows, but we feel that this is so fundamental that the vision needs to embed recognition of it, perhaps with the following wording:

"Scotland will have more diverse and balanced forests and woodlands integrated sensitively into a landscape of other land uses, which will be sustainably managed as a much greater part of the nation's natural capital providing an ecologically and economically resilient, high quality and growing resource that supports the delivery of public goods, contributes to a strong economy, furthers the conservation of

biodiversity and a thriving environment, and supports healthy and empowered communities.”

Q2. Does the strategy identify the right objectives for forestry in Scotland over the next 10 years? Please explain your answer.

We agree that greater and more sustainable benefits for the environment, people and economy are appropriate primary objectives for Scottish forestry. However, we also believe that the objectives should be reworded to better reflect the fact that the social and economic benefits from forestry are dependent on sustainable use of its environmental qualities. An ecosystem-based approach to maintaining and increasing our forests and woodlands as a natural capital asset could therefore form a useful basis for the strategy’s vision and objectives.

We intend to discuss the three objectives separately, but it is also important to stress that we do not believe they should be in a numbered list, as that suggests ranked priorities.

- **Increase the contribution of forests and woodlands to Scotland’s sustainable and inclusive economic growth.**

This misses the vital objective of transitioning towards a more beneficial balance in Scotland’s forestry.

For us, maintaining the natural capital in our forests, and the soil and water environments on which they depend, means that we should begin working towards a different balance in our forest resource mix. The next 50 years should see a deliberate, mindful transition to a future in which continuous cover native and mixed forests become the predominant form of forestry. Other European countries with similar environments, such as Norway, Sweden and Germany are already on this pathway. We believe this has genuine potential to distribute economic benefits from forestry to local communities and enhance the natural environment while doing so. The outcome at the end of the transition would, through its continuity and diversity, be sustainable in terms of the soil and water environment, be more climate-proof and more ecologically and economically resilient against plant pathogens than today’s forestry mix.

Our present forestry mix is not well placed to deliver the objectives or address the major issues identified in this draft strategy. Commercial forestry models based on limited species diversity and clearfell harvesting have negative medium to long term effects on the soil and water environments, have lower potential for biodiversity, are vulnerable to specialist tree pests and diseases, have heavily damaged the quality of our landscapes and often offer little in terms of economic inclusivity for those who live close to them. It is also likely that sitka spruce, already a prominent invasive non-native species spreading onto open ground habitats, will become significantly more invasive if, as hoped, deer populations are reduced. In the absence of an explicit strategic intent to transition to a more diverse forestry resource, we will be forever bound to supplying a wood fibre industry with single use forests which carry these heavy environmental and social costs.

Analytical work and modelling could be used to provide a rationale to quantify what the best mixture of the relative proportions of native, mixed and conventional commercial forestry would look like. This would be an essential first step to inform the planning

need to effect such a transition in practice. There are also very likely to be underused resources in the form of existing woodlands that are not currently in active management. These ‘neglected woods’ could help to smooth the transition to using different sources of timber by providing a pre-existing supply of potentially productive broadleaved timber.

The emphasis on our current Sitka spruce-focused approach to forestry in Scotland is storing up potentially huge issues for the future in terms of impacts of tree diseases such as spruce bark beetle. It is also worth noting that as deer populations - hopefully - come down, and deer browsing reduces, then dealing with sitka spruce regeneration on open ground habitats becomes a significant issue. In this context Sitka is a highly invasive non-native and we need to build thinking around how we reduce unintended impacts of growing this tree species into this strategy.

We do not dismiss the high economic value of the existing model of sitka-based commercial forestry in Scotland and neither would we wish to see the number of jobs it supports reduced in any way. A transition of this scale would need time, probably decades, to allow the commercial forestry industry to adjust its operations, supply to end product, as a carefully planned evolution. However, given the indirect environmental and social costs that come with this style of forestry, which currently accounts for almost two thirds of our forest cover in Scotland, surely it is incumbent upon a Scottish Forestry Strategy to signal a long-term direction of travel towards a healthier, more sustainable national balance in our forest resources?

Secondly, the influence of the Scottish Government’s Land Use Strategy (LUS) does not come across in this Forestry Strategy. Using a common language and approach would help stakeholder buy-in and implementation of the Scottish Government’s stated approach to land use policy. The LUS ambition to promote “responsible stewardship of Scotland’s natural resources delivering more benefits to Scotland’s people” could connect well with the new duty to promote sustainable forestry management.

- **Protect and enhance Scotland’s valuable natural assets, ensuring that our forests and woodlands are resilient and contribute to a healthy and high-quality environment.**

A key element of this will be achieved by improving the diversity of silvicultural approaches to retain forestry value locally, and this might be better captured in the drafting of the objective.

One of the keys to unlocking this multiple benefit future for forestry lies in shifting to different forms of silviculture, again following changing practices in Europe. Productive native and mixed forests managed under continuous cover regimes offer much greater opportunities for different simultaneous uses than dense, sitka-dominated plantations on clearfell and replant cycles. Continuous cover native and mixed broadleaf forests make significant positive contributions to ecological networks, ecosystem services, recreational opportunities and landscapes.

Moreover, and in line with the strategic direction of travel for Scottish farming, the timber we plan to harvest from such forests can be high value and, with the right investment, processed locally. Small businesses adding value to products before they leave local communities can retain the money and jobs in rural areas, without the need

for expensive investment in roads required to take large volumes of lower value timber long distances to centralised processing plants at high carbon costs. The total scale of each such business may be relatively small, but the value in local community terms is often significant. The potential to increase this as a component of local economies is clearly worthy of more strategic attention.

- **Use Scotland's forest and woodland resources to empower more people to improve their health, well-being and life chances.**

Although 19% of forestry's £1 billion economic contribution to Scotland comes from recreation, the majority of forest-based recreation is completely free to the end-user. Therefore, woodland has the potential to play an even greater role in addressing health inequalities for the Scottish Government,

Equally, the Scottish Government's Play Strategy discusses how forests should be integrated into curriculums frequently throughout the year, so there is potential for forestry to contribute even more here.

Scotland's leadership in 'green prescribing' should warrant far more integrated strategies on mental health, woodlands, and habitats. Neither the proposed Forestry Strategy nor the recent Mental Health Strategy commit to pursuing this important area that promises multiple benefits if we holistically address these emerging social and ecological crises.

Q3. Do you agree with our assessment of the major issues likely to have the greatest impact on the achievement of our objectives? Please explain your answer.

In general we do not dispute any of the 13 major issues listed, however we are very disappointed by the way in which the assessments fail to fully enumerate the obstacles and challenges which the issues present, alternative actions which might be explored, or even a recommended action to address each issue and achieve the objectives. We will deal with each issue in turn below.

We would also welcome several additions that present clear challenges to maintaining, enhancing, and restoring woodland ecosystems and biodiversity:

- Habitat fragmentation (E.g. urban development, energy developments and transport infrastructure, There is certainly a role for the National Ecological Network, as discussed in National Planning Framework NPF3 in addressing this)
- Research
- Irresponsible afforestation or "wrong tree in the wrong place" (including species, inappropriate location, monocultures, density, etc.)
- Habitat restoration
- Landscape aesthetics (e.g. denuded uplands)
- Biosecurity
- Grouse moor management (including muirburn)

Wood fibre supply and demand

We have concerns about the ongoing priority to restock felled sites. We recognise the need to maintain a timber supply in order to protect forest resources outwith the UK

and support sustainable management of appropriately sited forests. However, many plantations from the 1980s and 1990s were inappropriately sited, particularly those on deep peat, unimproved grasslands, dunes and existing ancient woodland sites, and would not comply with modern guidelines today. We strongly believe there should be a commitment to NOT restock these sites, and instead to focus on restoring them back to their original condition. This will deliver benefits to biodiversity, the wider environment and local communities and help Scottish Government to meet its obligations under the Biodiversity Duty and Climate Change Duty. Such a recognition in the Strategy would complement the existing Control of Woodland Removal Policy, and promote a more consistent approach in its application, which is currently absent.

High value but currently low volume broadleaved timber industry could be expanded, to generate more gross added value per area and offer the biggest area for potential expansion of the forestry industry. This would diversify our forests and make them more economically resilient by accessing a wider range of markets and more high value markets). The biodiversity value of the forests would also be improved and ecological resilience to pests and diseases would be enhanced. The majority of our forests are currently predominated by Sitka Spruce, so if one virulent tree diseases strikes sitka then the industry would be extremely vulnerable.

Rural land-use, productivity and integration

We agree that forest and woodland management must be considered within the context of wider land use. We would like to see the Scottish Government, with support from the appropriate statutory agencies, commission a spatial mapping assessment, considering woodland expansion targets alongside conservation and all other land use priorities in collective and integrated way in order to guide decisions and target support where it will maximise delivery of sustainable forestry. The output of such an exercise should clarify where woodland expansion is appropriate, not where it *could* take place based solely on the suitability of a location for tree planting. This must be supported and sense-checked by on the ground habitat and species surveys. Ideally, survey information should be assessed by an independent party, to minimise potential conflicts of interest. We see a clear connection between this and development of regional land use frameworks through the Land Use Strategy.

We welcome the phrasing, therefore, of ensuring a 'more integrated approach is taken' and that 'there is an opportunity to mainstream integrated land management in line with the principles of our Land Use Strategy.' However, we do not believe that this strategy can wait for a clearer idea of what other parts of the UK or other land management sectors in Scotland want to see in place of the EU Common Agricultural Policy (CAP).

In our response to the Stability and Simplicity consultation on transition to a post-CAP system Scottish Environment LINK, have urged the adoption of an integrated, sustainable land use policy. This strategy needs to lay the ground for a system which will be able to meet the specific needs of Scotland's forests and woodlands and the industries around them.

We believe that the National Forest Estate (NFE) and other publicly owned land should be managed as exemplars of best practice, contributing towards the delivery of other statutory duties such as the Biodiversity Duty. The NFE hosts many nationally important populations of key species including (but not limited to) red squirrel, chequered skipper, capercaillie, osprey, pearl-bordered fritillary, and crested tit, and

the Scottish Government should be managing its estate positively for these species. The strategy should set out how the Public Forest Estate can be managed as an exemplar of sustainable forest management, demonstrating how biodiversity, climate, social and economic priorities can be met, and tensions managed appropriately. “Economic growth” should not be the overriding priority for publicly owned land assets, they must be managed to deliver a range of goods and services which will benefit wildlife and people. They should not be viewed primarily as a potential source of income, and publicly owned land should not be considered for “disposal” if it is of high value to biodiversity and/ or local communities. Where land is “disposed” of, there should not be an underlying requirement for this land to continue to be forested, as other organisations/ agencies may be better placed to commit to habitat restoration where appropriate. Wildlife habitats are not a bolt on, and should be considered as a valuable public good which underpins economic and social benefits. The strategy should be explicit in how the Scottish Government will make use of publicly owned land to deliver biodiversity, and other, outcomes which will benefit the people of Scotland.

Economic development

We feel that the strategy emphasises the view that “highly productive” forestry is only that which is related to the value of timber processing. However, the economic value of forestry also encompasses other uses of forests for public access, recreation and tourism, especially in terms of the proportion of forestry-related employment, and we feel there should be more emphasis on that aspect throughout the strategy.

Ambitions for the economic development of forestry must be considered alongside climate mitigation and biodiversity drivers for Scotland’s ambitious woodland expansion targets, as in some cases these drivers may generate conflict if an integrated approach is not taken.

We are fully supportive of the principles of Sustainable Forest Management, and agree that economic growth must be sustainable, ecologically and economically, and inclusive. We do remain concerned that the interpretation of existing guidance is often weighted in favour of economic objectives and a strong push to deliver productive forest plantations. Whilst the UKFS may mean that the most severe negative impacts of past afforestation, such as planting on deep peat, are unlikely to be repeated, the Forestry Strategy must ensure that negative impacts on wildlife, priority habitats and designated sites, the climate and local communities are minimised. The current draft strategy does not adequately address these potential issues in its present form.

A survey on public opinion on forestry highlighted that 63% of respondents considered wildlife important when choosing a woodland to visit; 61% cited peace and quiet; 58% attractive scenery; and 53% a safe environment. These studies do not differentiate between native and non-native woodland but tourism income and experience could be improved if woodlands were better managed, providing more attractive, wildlife-rich places to visit. Therefore, in looking for opportunities for economic development of forestry, the strategy must consider the full range of economic opportunities which could be delivered through restoration, expansion and sustainable management of our native woodland resource, alongside the opportunities for sustainable commercial timber production.

Innovation

This section of the draft strategy appears to be focussed on the economic opportunities of innovation in the sector, and is fairly limited in its scope and ambition. We would welcome the inclusion of more information on other innovative opportunities for future forestry/ woodland creation and management. For example, consideration of the incorporation of trees/ woodland as part of green infrastructure schemes (such as vertical forests). This would support the climate change argument for tree planting and would be a novel approach in the British context.

We would like to see diversification and capacity building within the forestry sector to process native broadleaf species. The system is currently set up predominately for the processing of Sitka spruce. Diversification will be a key component of building a more resilient timber sector, particularly given growing biosecurity risk in a changing climate. With the land reform agenda pushing for greater access to land and greater participation by communities, opportunities may arise for smaller scale timber production from forests and native woodlands. The strategy should identify opportunities to facilitate innovation and the return of more traditional woodland management practices which support small businesses.

Developing future foresters and upskilling the existing workforce.

Ecological skills are not mentioned in this section, but they are a key part of the forestry sector, without which sustainable forestry cannot be practised. It is vitally important that foresters have a basic ecological understanding relevant to the work they undertake, so they can for instance avoid planting on deep peat and other sensitive habitats, avoid illegal disturbance of protected species in forestry operations etc. There has also been a loss of the more specialised ecological knowledge needed to provide advice on managing native woodlands, open habitats and priority species with the recent restructuring of FES. We would like to see these issues recognised and provision made for maintaining and nurturing these skills in the forestry sector as well.

Climate change

Ecological resilience in the face of climate change is essential for the long-term survival of woodland biodiversity. The strategy should make clear and strong links to this concept throughout.

If climate mitigation truly is the key driver for woodland expansion then new planting must not undermine the carbon sequestration potential of other habitats such as peatlands or other carbon rich soils. Furthermore, if climate change is the true driver for woodland expansion, we would propose that “area of woodland created” may be inappropriate as a target and/ or measure of progress, and that a carbon sequestration per year measure would be more appropriate as this is the issue that is purportedly being addressed. This would recognise and value the sequestration in restored peatlands and forest soils.

The strategy should emphasise the need for the long-term sequestration of carbon. Therefore, consideration should be given to the end use of timber products and a lifecycle analysis of carbon sequestration, storage and fossil-fuel displacement of the timber. End-uses which are likely to release carbon (such as wood fuel) should not be promoted in terms of climate change mitigation. There is now evidence that suggests growing trees in some areas may emit methane, a powerful greenhouse gas. Further research into the relationship between trees (and forestry practices) should be

prioritised – perhaps as part of the Woodland Carbon Code - and emissions should be accounted for when considering climate impacts of forestry and forestry operations.

Mitigation - As stated elsewhere, we believe that the draft strategy must recognise the opportunities for habitat restoration, to rectify damage caused by past afforestation and to minimise the emissions from degraded peat soils. Whilst woodland creation is undoubtedly essential to mitigate the impacts of climate change, the strategy must recognise that peatland protection and restoration can be an even higher priority in some cases.

Forestry guidelines suggest that wet woodland can be an appropriate land use for peatland habitats. Wet woodland is a rare and localised priority habitat and fen-carr woodland around the margins of raised bogs is a natural feature. However, the IUCN makes it clear that woodland does not naturally occur on wet peatlands and that woodland cover on peat generally indicates that the peatland is degraded in some way. Trees on peat both take advantage of existing lower water tables and exacerbates the problem of emissions from degraded bogs. Therefore, we strongly suggest that the strategy makes it clear that woodland removal on peat habitats is a necessary mechanism for the restoration of habitats for carbon and biodiversity. This includes the removal of planted and self-seeded trees and scrub on bog habitats. The control of woodland removal policy should not be used as an impediment in this situation to stop the restoration of important open peatland habitats from non-native or recently established native woodland. It should however be applied to protect long established, groundwater fed wet woodlands or wet woodlands hosting priority species on fens and the rare examples of bog woodlands on largely unmodified bogs.

The current low diversity of tree species in Scottish Forests, with low genetic diversity, is a major risk in terms of climate change. To mitigate the risks of climate change on Scottish forests and the forestry sector, the strategy should encourage a more diverse and resilient mix of tree species. We see Aspen as a key species missing from many of Scotland's woods. This is a key part of the UKFS, but should be highlighted in the strategy itself. Natural regeneration should also be prioritised, particularly in native woodlands, as a more diverse range of genotypes is likely to result, which will allow greater adaptation to climate change, resistance to tree diseases, appropriate genotypes and species selection to local environmental and edaphic conditions plus more natural and biodiverse native woodlands. Small scale open ground and variable canopy density is fundamental for so many of our internationally rare bryophytes and lichens.

Tree pests and diseases

We are concerned about the potential impact of non-native strains of *Dothistroma* which have been introduced into the UK on Corsican pine and Lodgepole pine. These strains may interact with the potentially native *Dothistroma* strain in Scots pine, potentially producing a more virulent strain and having a devastating impact on our important native pinewoods. We would welcome more research and risk assessment in this area and precautionary removal of non-native pines where they grow in proximity with Scots pine, to be replaced by Scots pine.

We would reiterate the point that the low diversity of tree species in Scotland's forests leaves the forest industry vulnerable to tree disease which may affect Sitka spruce. As identified in UKFS, there is therefore a strong argument to diversify both the range of

conifer and broadleaved species grown commercially and increase the proportion of native woodland in Scotland's forests.

Wild deer

The Forestry and Land Management Act Chapter 2, Part 1, section 4(b) (iv) requires this Strategy to have regard to the code of practice on deer management (drawn up under section 5A of the Deer (Scotland) Act 1996) therefore we feel that there should be significantly more on this issue within the Strategy. Deer management principles need to be thoroughly integrated into much of Scotland's land management, in particular to help achieve more native woodland cover.

The Scottish Government, through Forest Enterprise Scotland and SNH currently set ambitious objectives for the protection and enhancement of designated sites, by undertaking sustainable deer management. It is vital that this work continues to protect important habitats and protected areas. FES are also a leader in setting industry deer management standards, such as DMQ, Deer Management Best Practice and use of non-lead ammunition.

Current deer population levels add heavily to the costs of establishing and maintaining all forms of forest and woodland, be they commercial, amenity or for nature conservation. Natural regeneration, by far the best way of developing genetic resilience in our forests and more natural adaptation to the changing climate, is not possible without fencing or resource intensive deer culling.

The Scottish Forestry Strategy should explicitly acknowledge these fundamental issues and call for deer management to be integrated with the delivery of the Strategy's objectives. In the long term, deer management which allows forests and woodlands to naturally regenerate without the need for fencing would make a huge contribution to delivering the wide range of increased benefits that our forests could provide, not least improving the health of Scotland's deer. Such an aspiration would take time and planning to realise, but the environmental and economic benefits would be widespread.

The vision for Scotland has to be one where there is no longer a need for any costly, landscape intruding, and access denying deer fences to separate competing land management objectives. Fencing costs a lot of public money and is currently largely in place to protect the interests of sporting estates who have a commercial interest in maintaining high deer populations.

Scottish Environment LINK have been clear over the years that we see a statutory system of deer management as the best route to achieving the outcomes we need to see for the protection of Scotland's nature.

Enhancing our natural assets and improving their biodiversity value

We welcome the inclusion of this section but believe that it requires expanding to incorporate several key issues which are not addressed elsewhere.

Enhancing commercial plantation biodiversity - Productive conifer forests can be beneficial for woodland biodiversity, if managed appropriately, and we strongly advocate the improvement of older monoculture forests through restructuring and a greater emphasis on multi-functionality. In addition, new forests should be designed to incorporate greater elements for biodiversity..

Where clear-fell systems within commercial forests are unavoidable due to exposure and the high risk of wind blow, the incorporation of biological reserves in the form of mixed native woodland blocks (appropriately designed and located within a conifer forest) not only increases the sustainability of the forests by providing a refuge, but positively assists in the management of the commercial forest through the provision of more stable and attractive longer term habitats for large raptor and keystone species.

Enhancing native woodland biodiversity - It is disappointing that only 46% of native forest is deemed to be in a “satisfactory” condition for biodiversity. This suggests that biodiversity targets are being missed, and there is a failure to deliver the Biodiversity Duty, as well as international obligations for the conservation of designated sites and protected species. In 2018, the proportion of woodland designated sites in favourable condition fell 1.4% to 66.7%. The strategy must give greater recognition to the importance of management of native forests, to improve their ecological diversity and ecological resilience and provide a clear statement on how improvements in biodiversity will be achieved.

Priority species and habitats - Specific emphasis should be placed on the management and restoration of priority woodland habitats, notably Western Atlantic woodland, montane scrub and Caledonian pine forest. Forest Enterprise Scotland (soon to be Forestry and Land Scotland) already manage a high proportion of these important native woodlands, and the strategy should give a clear commitment to increase the extent and connectivity of these habitats, both in private and public ownership. Greater prominence should be given to the role of natural regeneration in woodland management and expansion.

Plantlife co-ordinates the Important Plant Area project, working with partners to identify internationally important areas for wild plants across the globe. Of the 47 IPAs identified in Scotland to date, 40% are recognised, at least in part, for their woodland features, highlighting the importance of woodlands for plant conservation. For example, the West Coast IPA, stretching from Kinlochbervie to the Mull of Kintyre, was selected for its internationally important Atlantic woodland and the diverse range of lichen and bryophyte communities that live there. Core areas were identified with zones of opportunity around and between them. These zones of opportunity are areas that, if managed appropriately, have the correct environmental conditions to allow the Atlantic woodland plant communities to spread and thrive. Identifying zones of opportunity to target appropriate management enables land managers to prioritise management to the most appropriate areas. IPAs such as the Cairngorms hold important areas of montane scrub, a rare and ecologically important ecotone where the natural tree line is exhibited in willow and juniper scrub, stunted scots pines and a host of attendant rare species. We would like to see a recognition of this important habitat which can and should be incorporated into planting schemes, with funding mechanisms to encourage uptake.

The draft strategy should set a timescale by which a review of current targets for priority species (e.g. capercaillie) and habitats (e.g. Caledonian pinewood, Western Atlantic woodland) will be undertaken. As many species will benefit from woodland management, a review of action for species should also be undertaken to assess the effectiveness of previous interventions. As no targets are presented here for species targets, we would welcome clarity on whether previously agreed species targets are to be retained and reported upon.

Also, the strategy does not refer to the protection of existing open habitats, despite afforestation representing a risk to many open habitats and associated priority species. Afforestation is likely to be one of the key drivers of some species decline, so the draft strategy should recognise the importance of protecting open habitats from further loss, this includes the cumulative impacts of multiple new planting schemes in a single area. This issue is often inadequately considered and is a significant concern, particularly for schemes which do not undergo an environmental impact assessment.

Montane scrub - As a habitat, they contain some of our most specialist soils, plant, fungi and insect species, making them critical for some of Scotland's rarest species. However, mountain woodlands can also extend ecological connections for tree-related wildlife well above the timberline. Found at altitudes up to 650m in Scotland, with the potential to reach as high as 750m in eastern Scotland, mountain woodlands have the potential to act as corridors over watersheds glens, facilitating species dispersal and gene flow from one glen to the next.

There is also growing evidence that mountain woodlands can play a significant role in mitigating the effects of climate change and reducing run-off resulting in the moderation of flood levels and frequency further down the water catchment. Research suggests that high altitude tree cover intercepts heat from sunlight, helping to keep montane soils cooler, more consistent temperatures. This helps plants, fungi and wildlife adapt to the changing climate. The presence of trees at this altitude also helps to maintain soils from erosion and runoff, and ameliorate flooding risks.

Caledonian pinewood - The area of genuine native pinewood in Scotland remains critically low. There are only about 100 remaining fragments of pinewood, but no full survey targeted at these has been carried out since the pioneering work of the 1950s. The Caledonian Pinewood Inventory of the early 1990s did revisit sites previously identified, but many smaller sites were missed or omitted. We should now be fully aware that there are only a few areas where there is over one square mile of contiguous Caledonian pinewood, the main concentrations being in the Cairngorms and in the Glen Affric area. Pinewood fragments in the north, south and west Highlands are mostly small and always isolated. We estimate that around half of the existing Caledonian pinewood sites are in remote locations in the west Highlands where many continue to decline, unrecognised. In many of these sites a few old trees are all that remains of a once vibrant woodland ecosystem, a poignant echo of the past. The Caledonian Pinewood Recovery project is aiming to assess some of these sites, but the smallest and most vulnerable have the greatest chance of being missed. Recent work has indicated that previously unidentified populations of Caledonian pine may exist in remote locations, including in the Scottish Borders. It should be a priority to identify all the existing pinewood remnants and bring this knowledge together. Without knowing where they are, it is impossible to protect these sites. Efforts must then be made to prevent the continuing loss of pinewood from lack of regeneration caused by browsing and burning. We would like to see full protection given to all sites that support these old growth areas of pinewood and funding targeted at their long-term survival.

Ancient woodland - We support Woodland Trust Scotland's call for a no loss of ancient woodland policy, and propose that the strategy makes clearer links to how these woodlands can be protected through regulation of felling, of deer and through the Planning system.

Invasive non-native species - INNS represent one of the many threats to our native woodlands, as well as productive forests. Additionally, self-seeding trees can become invasive if allowed to spread into adjacent open habitats and/ or native woodlands. This is an acknowledged issue on some designated sites. We propose that invasive species are addressed as a specific issue, with the strategy clearly setting out how the Scottish Government intends to address both the removal of INNS that are negatively impacting upon woodland biodiversity, and the legacy of forestry species acting as invasive species on adjacent sites, particularly where this is impacting upon habitat restoration schemes and / or the status of designated sites.

Environmental and landscape quality

Landscape - Many of Scotland's landscapes are characterised by historic blocks of plantation forestry, and while we acknowledge that new forests are being more carefully designed to have a less dominant landscape impact, we believe that there is more that can be done – especially in around forestry tracks - and a strong case for “retrofitting” existing forestry with softer edges. **Where afforestation is proposed in areas with landscape designations, the opportunity should be taken to enhance the landscape as far as possible.**

Forest tracks - The Scottish Environment LINK hilltracks group published their Changing Tracks report in September 2018 which highlights concerns over the construction of some forestry tracks. Some tracks can lead to significant landscape and environmental impacts. This report highlighted that while permitted development rights apply to tracks: *“the potential for major landscape and other impacts from forestry tracks shows that some forestry track proposals would benefit from much closer scrutiny at the planning stage and from the perspective of the lack of opportunity for public comment.”* We would therefore call for the Strategy to recognise that the forest plan process needs to better take regard of track construction.

Fencing and access - In terms of forest design, where fencing is used we have seen cases of access being restricted or blocked where existing routes have not been protected if they are not core paths. In some areas, well-used paths have been destroyed during the planting process but not been re-established afterwards as the forestry managers have referred to them as simply “desire lines”. Given the block on public access over huge swathes of land due to new or existing forestry plantations, and especially during the phase after harvesting when re-planting is taking place, we strongly suggest that public access needs to be maximised and given a higher priority during the planning of forestry to enable both existing and new routes to be included in the new plan and for existing routes to be improved during the process.

Montane scrub - As mentioned above, stronger deer controls would enable more mountain woodlands to get established and more natural regeneration of woodland with resulting benefits at a landscape scale. Mountain woodlands offer unique biodiversity value and a sensitive landscape effect transitioning from dense forestry to bare uplands. Scotland's montane scrub habitats have been gradually lost by centuries of neglect and overuse, to the point that Native Woodland Survey of Scotland from 2014 shows that it now comprises just 0.2% of land cover in the Highlands. This is a tiny, fragile remnant in need of urgent action to increase its extent and restore the benefits it provides.

We strongly believe Scotland needs targets to expand its montane woodland cover.

Dead wood - Equally, sensitive management of dead wood (either fallen or standing) within forests is vital for wildlife, in particular invertebrates such as Long horn beetles and some hoverflies; some of which are very rare and restricted to certain areas, e.g. Pine hoverfly and Aspen hoverfly within the Cairngorms. So the Scottish Forestry Strategy should aim for Scotland to have a larger dead wood resource in future.

Risks around woodland creation - We agree that well-managed woods can help manage water quality and biodiversity, but it would be helpful if this section of the strategy highlighted some of the risks presented by it too, such as acidification and erosion caused by drainage gullies.

Unless it is well managed, new tree planting can be damaging. Trials have shown that in upland areas, atmospheric nitrate condenses out onto trees and transfers to soil/water, to a greater extent than it condenses onto shorter vegetation. Current drainage methods have improved over the last 40 years, but ditches can still run very close to nearby streams. Shading is also somewhat contentious – in some places trees need to be kept back from stream banks to avoid over-shading. The basis of the trout food-web such as diatoms and algae need sunlight to thrive. Yet, we also see that currently increasing water temperatures are reaching levels potentially detrimental to salmonid spawning in many streams, so the shading effect of riparian planting is clearly needed.

Inappropriately sited woodland creation can have a negative effect on wading birds, particularly curlew. Curlew and all other wading bird species have declined substantially in recent years (61% decline in curlew breeding abundance 1994 to 2017). At a recent Scottish conference to examine the reasons for this decline and what can be done woodland creation was heavily criticised as being a major factor behind curlew declines. More robust assessments of potential implications of new woodland creation schemes on species like curlew are essential if the drive for significantly increased woodland cover continues. This includes a better understanding areas where woodland creation should not take place.

Well-being

We welcome the inclusion of this section but would like to see more emphasis on the role of the forestry sector in positive promotion of public access and recreation to benefit health and well-being. We welcome the strong support for mountain biking within forestry areas, but as well as creating, improving and maintaining path networks and the associated promotion of these routes, we believe forestry managers could also proactively enable and support more public access through, for example, establishing low cost campsites within and at the edge of woodlands, or by providing facilities for other activities such as horse riding. There is also a role for forest managers in helping to promote responsible access, according to the Scottish Outdoor Access Code.

Equality and Empowerment

We welcome the acknowledgement that local people and communities should have a greater say in, and the ability to, actively manage woodlands and forests. More explicit reference should be made to the Land Reform agenda and to the powers set out in the Community Empowerment Act.

The role of woodlands and forests in education seems to have been largely omitted from the draft strategy, and could perhaps be captured in this section.

We would also welcome a clearer statement on engagement with stakeholders, as tension between various user groups has been perceived as a potential barrier to woodland expansion by some parts of the forestry sector.

Urban forestry

The role of woodlands in providing benefits for the urban population has been clearly demonstrated through the Woodlands In and Around Towns initiative and other projects. The consultation document points to one particular study which shows £14m health benefits arising from £2.5m investment, and this demonstrates the need to continue to provide funding for such projects which have such wide-ranging social benefits. There is also a link to improving air quality in urban areas through expanding woodlands, with further benefits to health as a result.

Woodlands provide a wide range of ecosystem services delivering social benefit, including opportunities for recreation, education and employment. The new strategy should identify opportunities to facilitate public access and interpretation, support recreational use, tourism and delivery of health and well-being benefits. It should also identify opportunities to facilitate delivery of urban greenspace and new generations of trees outside woodlands, such as hedgerow trees and in-field trees (where appropriate), wood-pasture, parkland and orchards, that sit within and complement a wider ecological network. Greater consideration should be given to novel approaches, such as an increase in the use of trees in green infrastructure projects (for example vertical forests, SUDS schemes etc).

MISSING ISSUES

Habitat fragmentation

The failure to acknowledge the role of habitat fragmentation anywhere in the Strategy, especially in the assessment of impacts, puts in sharp focus the Strategy's overall failure to substantively tackle biodiversity decline, or identify strategies for restoring biodiversity. Habitat fragmentation, in relation to woodlands, occurs when (normally anthropogenic) development or management divides an existing expanse of woodlands into smaller pockets. The road and rail networks are clear examples of this, as is the co-option of land for agricultural use, the use of fences or walls, etc. This can result in isolated woodlands developing with a reduced genetic diversity, impacting their resistance to disease. In broader terms, particularly non-avian species can struggle with a reduced range, breeding opportunities, and food access due to their isolation in fragmented habitats. The identification of this particular problem requires seeing woodlands in terms other than acreage or number of trees and looking instead at distribution and connectivity.

Scottish Environment LINK support the development of a National Ecological Network as committed to in the 2020 Challenge for Scotland's Biodiversity and the National Planning Framework (NPF3). Woodlands and forests could be the arteries of a National Ecological Network, helping make connections across the landscape. The Forestry Strategy should seek to help deliver Government ambition in relation to the National Ecological Network.

Research

There are still large gaps in our evidence base across a whole range of the issues covered in section 4. The Strategy should seek to identify some key areas for research development going forwards (either here, or as a “priority” in table 2). Similarly, woodland data is not mentioned, and there are no actions proposed to update any of the main woodland datasets, such as the Native Woodland Survey of Scotland (2014), the Caledonian Pinewood Inventory or the Ancient woodland inventory in the lifespan of the draft strategy (up to 2029). As the current datasets become increasingly out of date it will become more and more difficult to assess the condition of woodlands, and their contribution towards natural capital indices. It will also be difficult to monitor progress of any action taken to improve woodland quality, for example through the removal of INNS, as there will be no accurate baseline against which progress can be measured.

Q4. Do the ten priorities identified in table 2 capture the areas where action is most needed to deliver our objectives and vision? Please explain your answer.

We do not feel that there is a clear natural link between the 13 major issues and the 10 priorities (despite the assistance of Table 3). Plus, from a purely data presentational point of view, we do not believe that the Objective columns in Table 2 add any useful insight to the table.

Promote and develop the concept of sustainable forest management as it applies to Scotland.

The existing suite of guidance and standards around SFM and environmental protection need to be enforced rigorously, but we especially welcome the use of the word “develop” here. In practice, the UKFS clause of ‘maintaining biodiversity’ could be expanded on to include ‘restoring and enhancing biodiversity’ when applied in Scotland, and improvements continually made to best practice, alongside a greater uptake of UKWAS certification.

Sustainably expand the area of all types of woodlands and forests across Scotland and ensure harvested sites are replanted appropriately.

Whilst we agree with this it would be useful to include an explicit commitment to restating the “right tree, in the right place, for the right purpose” principle here, since not all harvest sites are appropriate for replanting.

Protect forests and woodlands from damage caused by new or existing pests and diseases, promote the sustainable management of wild deer and build resilience to support adaptation to climate change.

Wild deer should be a priority in its own right and not lumped in with pests and diseases which should also be a stand-alone category. Deer are the principal reason for lack of extensive woodland regeneration across swathes of Scotland and the voluntary approach has failed. The SFS should therefore recognise the need for legislation on statutory deer management.

Increase community ownership and management of forests and woodlands.

Always a good idea. The far greater incidence of owner-occupied land in south west Norway is considered by some a key factor in the successful afforestation of that area (plus contributing to more diverse revenue streams – timber being only about a third of income from rewilded woodlands). There are, however, many forms of community engagement with forestry, such as woodlots, community shares and even local authority pension funds, so simple community ownership is not always the most appropriate option.

Increase efficiency, productivity and the value generated from forest products and services and help develop forestry's role in creating a low-carbon economy, by supporting technological innovation, improving the capacity and skills of those working in the sector, and developing existing and new markets.

There is very interesting work in the current Finnish Road Map to a Circular Economy 2016-2025 which explores the role which "Forest Loops" can play in a national circular economy, this includes changing the metric by which productivity is measured in the Finnish Forestry Strategy from quantity of wood fibre produced to value of wood product. This promotes a higher quality of forestry with higher environmental benefits.

There is no information in the SEA or main strategy to quantify the assertion that increasing the use of timber in housing construction leads to carbon becomes sequestered in housing stock. The claim does on the surface make sense, but there's no analysis we can see of net GHG numbers that would back it up – the effect could be negligible, non-existent, or could be a significant contributor to reducing CO2 emissions. Soil sequestration, especially peaty soils, is orders of magnitude more effective for Carbon sequestration than any vegetation in Scotland, and afforestation in peatlands has impacted negatively on this far greater carbon sink. Also, its worth remembering that the wrong kind of development would still be bad, even if it used local timber.

Increase the natural capital value of Scotland's woodlands and forests by improving the condition of native woodlands and forests, and increasing the positive impacts of forest and woodland management on biodiversity, air, water, soils, flood management, landscapes and the historic environment, mitigating the risks of negative impacts.

This single priority is insufficient to deliver progress towards the objectives. Each of the key theme areas (biodiversity, air, water, soils, flood management, landscape and historic environment) should have their own identified SMART actions to ensure delivery. Also, negative impacts should be avoided, not just "mitigated" against as stated in the priority statement.

At the very least biodiversity conservation, restoration and enhancement requires its own priority in order to deliver the duty on SFM. The ecological condition of all forests and woodlands should be improved, not just native woodlands.

Increase the use of Scotland's forests and woodlands to improve health and well-being, help people better understand forestry, and support wider Scottish Government activity to help children become confident and resilient members of Scottish society.

Whilst good in general, there needs to be more crossover specifically with the 'greenspace design' approach commissioned by Forestry Commission Scotland with the NHS and Centre for Sustainable Healthcare. We'd also note that this misses out the important role that outdoor education plays more widely in developing all of the people of Scotland's (not just children) understanding of the natural world.

Increase the positive contribution that urban forestry makes in Scotland's towns and cities.

We warmly welcome this addition to the Forestry Strategy, trees outside woods, and woods in and around towns represent a great opportunity to bring the benefits of woods and trees to the population centres of Scotland. We would also welcome the

Scottish Government exploring the benefits, practicalities, and research gaps of vertical forestry (e.g. as in Milan, Paris, Shanghai, and Eindhoven).

Q5. Can you provide any examples of delivery mechanisms that have previously been effective in delivering similar objectives and priorities?

There have been widespread calls for recognition of regional variation and approaches across the sector, from eNGOs to the Agriculture Champions to Confor. Spatial recognition of existing forestry, will help to direct where future planting may best be focussed. Two regional land use strategy pilot schemes, in Aberdeenshire and the Scottish Borders, have demonstrated some success in delivering an integrated land management approach. We need a process for identifying regional land use priorities and the public goods and outcomes desired from each region. Regional Land Use Frameworks (RLUF), as proposed by the Land Use Strategy, are our recommended avenue for carrying out this work.

We would like to see RLUFs completed for each Scottish region. These RLUFs should be framed by national level objectives and priorities as expressed in the National Performance Framework and be used to establish regional priorities. These, in turn, could be used to help decide how public funding could be allocated on a more regionalised basis. Two pilots in the Borders and Aberdeenshire demonstrated the usefulness of this process and some key lessons were learned as to how RLUFs could be developed more widely.

Development of RLUFs should complement the introduction of a National Ecological Network in Scotland, in line with Scottish Government commitments in Scotland's Biodiversity - a Route Map to 2020 and the National Planning Framework 3. Scientific evidence and academic literature overwhelmingly supports the introduction of a National Ecological Network to benefit the environment, wellbeing and economic prosperity- all of which are objectives of this forestry strategy. There has been little progress in the roll-out of a National Ecological Network in Scotland, however it would supplement RLUFs by providing an overriding, holistic policy approach that integrates the enhancement and protection of nature into policies, proposals and funding streams, so that they can deliver multiple public benefits more effectively.

The delivery of RLUFs and the NEN can be achieved by securing an appropriate balance between regulation, incentives and the provision of advice to land managers. The current regulatory and incentive systems have had some success in delivering positive outcomes. However, we believe the approach outlined above will be more effective in delivering public goods and a sustainable forestry sector in the long term.

A key foundation of an integrated approach is good engagement and strong relationships with key stakeholders and interested parties. The current system of consultation in the forestry sector is adequate, but could be much improved to be more responsive to the needs of communities and stakeholders. A revised Customer Charter may assist in improving communication and consultation, but this must be developed with partners, not imposed after the charter is completed.

It is worth stressing that 19% of the current economic value of forestry comes from the contribution of forests to tourism, public access and recreation. Therefore it is important that funding continues to be available to support these activities, for example by creating and maintaining path networks, providing toilets and car parks and promoting these facilities.

The UKFS has had some success in delivering the objectives of Sustainable Forest Management. However, as previously stated we believe that it is inadequate to fully deliver the objectives of this strategy as it is mainly a guidance document, which points to existing legislation and regulations, rather than adding anything “extra” for biodiversity, the environment or social outcomes. It is also insufficiently monitored and there is limited capacity for follow up should its requirements not be met. The EIA regulations are also inadequately applied, and therefore have had limited success in delivering the objectives of the strategy, despite having the potential to deliver positives for the environment when properly utilised.

We agree that the woodlands in and around towns (WIAT) initiative has had success in delivering multiple objectives, and is a good model for future delivery of the strategy in urban areas. As there is now a public authority duty to “promote sustainable forest management”, we strongly suggest that additional guidance is provided to assist local authorities in discharging this duty. In particular, the recommendation in SPP that planning authorities develop forestry and woodland strategies should be updated to reflect a regional land use framework approach.

Q6. For any delivery mechanism examples given in answer to question 5, please explain why they worked well?

See Question 5

Q7. Do you think the proposed progress indicators are the right ones? Please explain your answer.

For such a multi-faceted strategy more indicators are required to demonstrate any meaningful progress towards delivery of the objectives.

OBJECTIVE: Increase the contribution of forests and woodlands to Scotland’s sustainable and inclusive economic growth.

- **Contribution of woodlands, forests and the forest sector to the Scottish economy (GVA and jobs).**

GVA and jobs alone are insufficient indicators, as neither can give any indication of sustainability. GVA is incapable of measuring either ‘sustainable’ or ‘inclusive’ growth. As a blunt instrument, GVA measures economic activity without judgement as to whether this is sustainable or damaging. Any increases achieved in GVA must be incidental to genuine sustainability and progress indicators.

Scottish Environment LINK would welcome a wider discussion about how to diversify the econometrics used, especially in determining sustainability and inclusivity, to move away from the current concentration on GVA/GDP only and widen out the metrics. This would help achieve alignment with the National Performance Framework and Sustainable Development Goals.

- **Volume of available wood fibre.**

This is a useful indicator

- **Area of woodland and forests.**
- **Area of new woodland and forest creation**

Both of these are useful and should continue to be published with a distinction between conifer and new broadleaf planting.

OBJECTIVE: Protect and enhance Scotland’s valuable natural assets, ensuring that our forests and woodlands are resilient and contribute to a healthy and high-quality environment.

- **Woodland contribution to Natural Capital Index.**
- **Proportion of protected woodland and forests with natural features in favourable condition.**

Using only protected (SSSI and SAC) sites as an indicator misses much of Scotland’s native woodland resource. For instance for Caledonian Pinewoods only about 50% of the pinewoods on FCSs’ Caledonian Pinewood Inventory have protected status.

We would be pleased to see an indicator in terms of the % of Plantations on Ancient Woodland sites (PAWS) under active restoration. Scotland’s ambition should be to restore 100% of PAWS.

- **Area of new native woodland and forest creation.**

These indicators are essential, but they are not by themselves sufficient to measure their contribution towards a ‘healthy and high-quality environment’. The Strategy should commit to adopting at least the existing 13 ecosystem health indicators used by Scottish government, with further commitments to adopting new ecosystem health indicators if and when these emerge. Moreover, the Strategy should acknowledge that, whilst a welcome start, the Natural Capital Asset Index is very much a work in progress and we need to improve the suite of data sets that are used in its calculation.

OBJECTIVE: Use Scotland’s forest and woodland resource to empower more people to improve their health, well-being and life chances.

- **Numbers of visits to forests and woodlands.**
- **Area of forests and woodlands that are owned by communities.**

We strongly support the recognition of health, well-being, and life chances, and their relationship to access to nature and a healthy environment. We do, however, encourage the Strategy to be far more innovative in both measuring and promoting these human-nature relationships. One key metric should be so-called ‘green prescribing’ under the ‘Natural Health Service’ approach defined by Scottish Government: “Outdoor activity has been shown to be beneficial for physical and mental health and wellbeing”. Despite the emerging medical consensus of the importance of this, the Mental Health Strategy 2017-2027 failed to mention access to nature anywhere in the Strategy. Another key metric, therefore, should be the extent to which the necessary joined-up, inter-departmental thinking reflects the political will and available evidence.

As importantly, we believe the proposed indicators will be insufficient in acknowledging, let alone addressing, the social inequalities related to access to nature and recreation. Ethnicity, age, disability, gender, and socioeconomic status are all associated, to various degrees, with participation in outdoor activities in Scotland.

We would therefore welcome a far more comprehensive, interlinked set of indicators to acknowledge the complex social and economic pressures on people’s empowerment in this context. This could be as simple as beginning with the work already done by the Scottish Government in identifying trends of inequality and their relationship to outdoor recreation. A Forestry Strategy needs to work for all, and for this reason we welcome the commitment to empowerment but believe the Strategy has not fully considered the implications of this.

Q8. Do you have any suggestions for other indicators we could use to measure progress (especially ones which draw on existing data)?

The 'Native Woodland Survey of Scotland' measured the area of healthy native woodland (using 'native woodland condition indicator values') now that a 2014 baseline has been established, it would be very useful to continue to monitor progress against it.

As above, the following need to be included in addition to the proposed indicators:

- % of Scotland's native woodland in acceptable condition according to the NWSS' native woodland condition indicator values, or comparable metric.
- % of Scotland's forests certified against UKWAS
- % of Scotland's forests with an approved forest plan
- % of Scotland's forests under an active deer management plan
- % of Scotland's PAWS under restoration, and completed
- % of understory dead wood within native woodland
- Area of Ancient Woodland lost to development
- A measure of the length of paths through woodland to demonstrate access
- A woodland bird populations indicator
- A woodland Lepidoptera indicator
- Progress against SBS Routemap 2020 targets
- Inclusive Development Index
- Annual and total areas of land coming under community control

Q9. For any indicators suggested in answer to question Q8, please explain why you think they would be appropriate.

Most are self-explanatory.

GDP/GVA are proposed as indicators of objectives they have no means of measuring, given the evidence that these metrics are not indicative of wider developmental priorities. Whilst we do not propose abandoning these measures, we emphasise the need to include additional and more important indicators that can help actually measure against the delivery of the relevant Strategic Objective. The existing Strategy proposals identify extremely blunt instruments and ignore a far more precise toolkit.

Q10. Would you add or change anything in the Equality Impact Assessment (which includes our assessment of the potential impact of the strategy on inequalities caused by socioeconomic disadvantage – Fairer Scotland Duty)?

This has failed to take account of the Scottish Government's own evidence on social divisions and access to outdoor recreation and nature-based sports, including walking, that woodlands are so important for. The only evidence collected is a basic overview of the workforce diversity of the forestry industry. This is a missed opportunity to explore issues of access to nature, green space, and recreation, and how these relate to social equality. This should be fundamental to any assessment of a sustainable and inclusive economy. We strongly urge the Strategy to revisit this and produce a far more comprehensive report on this basis.

Q11. Would you add or change anything in the Business and Regulatory Impact Assessment?

The seven business groups engaged with do not represent the diversity of business stakeholders in woodlands ecosystems:

- Association of Deer Management Groups
- Confederation of Forest Industries
- Institute of Chartered Foresters
- National Farmers Union Scotland
- Scottish Land and Estates
- Scottish Forest and Timber Technologies Industry Leadership Group
- United Kingdom Forest Products Association.

This grouping leaves out local business, tourism, leisure (e.g. cycle hire), cultural industries, and conservation, etc. This raises concerns about the extent of engagement in the Strategy overall, and reinforces concerns that it concentrates too much on timber production.

Elsewhere, there is no acknowledgement of the role of environmental entrepreneurship, and no broader grounding of the business impact in the circular economy vision.

Overall, the impact assessments in general all have the same base problem of ignoring the responsibility to provide 'alternative options' – this is simply taken as “Option 1: Do Nothing” and “Option 2: Publish a Forestry Strategy for Scotland”. This seems to be a dereliction of duty under the legislation which established these processes by presenting a false dichotomy.

Q12. What are your views on the evidence set out in the Environmental Report that has been used to inform the assessment process?

Overall, we support the Report's inclusions, but feel there remain important knowledge gaps that require an ongoing commitment to tackle.

We welcome the acknowledgement that soil functionality could be negatively impacted by increased visitor numbers. However, there is no clear means set out in the Strategy for managing these potential impacts, which would amount to balancing the right to access natural spaces with the need to protect those spaces from excess use, including congestion effects. This is important for acknowledging that increasing 'nature tourism' must be carefully and responsibly balanced. It is little use promoting 'nature tourism' if this ultimately has a net-negative impact on the spaces promoted. There are also important local, social impacts to consider, such as upward pressures on house prices, business rates, and local air quality from increased traffic.

The Strategy and Environmental Report occlude any possibility of wildlife reintroductions for lost native species that have an important, often keystone role in the sustainable self-management of woodlands. The Environmental Report should consider these at least under alternative proposals, or ideally enhancement measures. Whilst it may be too early to set timelines for reintroductions, syntheses of the available evidence, in Scotland and elsewhere, of the existing and potential impacts should be included in the Environmental Report and carried over into the Strategy. Scottish Environment LINK strongly encourages the Scottish Government to take an evidence-led approach to this important principle of conservation that is, at present, committed to in the EU Habitats Directive.

Q13. Should any additional evidence sources be used in the Environmental Report? Please provide details.

More alternative scenarios that just 'do nothing'.

Q14. What are your views on the predicted environmental effects as set out in the Environmental Report?

Needs more research. Initial thoughts are the ongoing biodiversity net-loss from failing to commit to biodiversity restoration and enhancement rather than simply maintenance.

Q15. Do you agree with the conclusions and recommendations set out in the Environmental Report?

We cannot fully support the conclusions and recommendations of the SEA. Whilst we encourage the Strategy to adopt the ecosystems approach mentioned in the SEA, elsewhere the SEA needs to take greater account of alternatives rather than 'do nothing'.

Q16. Please provide any other further comments you have on the Environmental Report.

The Strategy does not identify any priority areas of improving woodlands or forestry condition. UKWAS, which includes Forestry Stewardship Council (FSC) criteria, currently covers all Forestry Commission Scotland woodland, but only covers 35% of non-Forestry Commission woodlands. As such, 65% of private woodlands and forests are without auditing under the Woodland Assurance Standard.

Q17. Do you have any other comments you would like to make about the draft strategy for forestry in Scotland?

Scottish Environment LINK accept the target increase in woodland cover from 18% to 21% as a bare **minimum**. Whilst we acknowledge this target comes from the Climate Change Plan, we do note that Scotland's previous Forestry Strategy from 2006 had a higher woodland cover target of 25% and stated that "work done for Forestry Commission Scotland by Macaulay Research Consultancy Services indicates that this is feasible."

The European average is around 38% woodland cover and the success of reforestation efforts in European climates and geologies similar to Scotland's show that more is possible.

Bearing in mind all that has been said above about the right tree in the right place, we would like to see ambitious plans for the creation of new native woodland, so would like to see this strategy stretch the 21% woodland cover target, at least to the levels of the 2006 Strategy's 25% ambition.

Moreover, the target of 100,000 ha new woodland by 2030, with 10,000 new ha a year increasing to 15,000 a year by 2025, is already not being met. Even in its best year, 2017, Scotland missed this target by 29%. The Strategy should outline how the existing delivery gap will be closed, in particular the relative contribution of natural regeneration.

Whilst the poor forest design, location and species selection of the 20th Century must not be repeated, historic planting rates in Scotland do show that much higher rates of woodland creation could be achieved.

In terms of the split between conifer and broadleaf planting LINK members encompass a range of views, but all are agreed on a minimum percentage of broadleaf planting

between 40-50%, with some arguing for a higher percentage. All agree though that a native planting target is needed to replace the Scottish Biodiversity Strategy Routemap's of between 3,000-5,000ha each year, and respond to the gradual increase of the total target under the Climate Change Plan by increasing the native planting target accordingly.

This consultation response is supported by the following Scottish Environment LINK members:

- Badenoch & Strathspey Conservation Group
- Buglife Scotland
- Butterfly Conservation Scotland
- Froglife Scotland
- National Trust for Scotland
- Nourish Scotland
- Plantlife Scotland
- Ramblers Scotland
- RSPB Scotland
- Scottish Badgers
- Scottish Coastal Archaeology and the Problem of Erosion (SCAPE) Trust
- Scottish Farming and Wildlife Advisers' Group (Scottish FWAG)
- Scottish Wild Land Group
- Scottish Wildlife Trust
- Trees for Life
- Woodland Trust Scotland
- WWF Scotland



For more information contact:

Charles Dundas, Convener of the LINK Woodland Forum,
charlesdudas@woodlandtrust.org.uk, 0343 770 5806

or

Daphne Vlastari, LINK Advocacy Manager,
daphne@scotlink.org, 0131 225 4345

www.scotlink.org

www.savescottishseas.org

www.fightforscotlandsnature.scot