

Response to the 2nd Consultation on the Scottish Forestry Strategy 2006

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Respondent Information

Name	Scottish Environment Link LINK Woodland Task Force (compiled by Mike Wood) Scottish Environment LINK is an umbrella body for environmental NGOs. In this case we are representing the views of: <ul style="list-style-type: none">• Butterfly Conservation• Council for Scottish Archaeology• John Muir Trust• RSPB (Royal Society for the Protection of Birds)• Scottish Native Woods• Woodland Trust Scotland
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1. Are you responding: (please place a cross in one box only)

a) as an individual please go to Q2a/b and then Q4

b) on behalf of a group/organisation

please go to Q3 and then Q4

Individuals

2a Do you agree to your response being made available to the public? (at Forestry Commission Scotland, 231 Corstorphine Road and their website)

YES (go to 2b below)

NO, not at all (*We will treat your response as confidential*)

2b Where confidentiality is not requested, we will make your response available to the public on the following basis (please cross **one** of the following boxes)

YES, make my response, name and address all available

YES, make my response available, but not my name or address

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On behalf of Groups or Organisations

3. The name and address of your organisation will be made available to the public (at Forestry Commission Scotland, 231 Corstorphine Road and their website). **Are you also content for your response to be made available?**

YES

NO (*We will treat your response as confidential*)

Sharing Responses/Future Engagement

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YES

NO

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Review of the Scottish Forestry Strategy – Second Consultation
Consultation response by Scottish Environment LINK
May 2006

Introduction

Scottish Environment LINK welcomes this opportunity to contribute to this consultation.

1. Draft Scottish Forestry Strategy

a) General comments

We are supportive of the overall objectives and tenor of the draft Scottish Forestry Strategy. In particular the emphasis placed on the wide social and environmental roles that Scottish forestry can provide, including supporting biodiversity, improvements to peoples quality of life, economic development, and adaptation to climate change. But, we have a number of concerns.

Our main areas for comment relate to:

- Key Themes, Targets and Indicators;
- Native woodland expansion & restoration of Plantations on Ancient Woodland Sites (PAWS);
- Delivery of biodiversity targets for priority species and habitats;
- Climate change;
- Delivery of European Landscape Convention commitments;
- Delivery by state and private sector;
- Standards of sustainable forestry practice funded through SFS delivery mechanisms.

Key Themes, Targets & Indicators

We are concerned at the **lack of clear targets for many areas of activity, and gaps in the suite of indicators**. It is important the strategy comments on whether these baseline indicators represent an adequate level of provision and whether movement from this baseline is desirable or not.

We think terrestrial insects, specifically butterflies and moths, could have a useful role as indicators of habitat condition, especially of open space habitats.

Native woodland expansion & restoration of Plantations on Ancient Woodland Sites (PAWS)

Expansion of native woodland will play a vital role in adaptation to climate change through the development of Forest Habitat Networks, and the expansion of existing ancient and native woodlands to make them more robust in the face of change. Native woodland can also play a prominent role in social objectives relating to improving quality of life and provision of woodland access, and to economic aims through the development of timber resources.

We regard the restoration of **PAWS as a high priority** and an area in which the National Forest Estate can play a major role. We would like to see greater urgency in getting PAWS into the restoration process. That is, surveyed and with an agreed management plan for their restoration. We are keen to see PAWS restored, but also subsequently managed to benefit priority species. We feel the current targets are not ambitious enough.

The process of full restoration to native woodland needs to be underway for a further 9000 hectares of PAWS, with the remaining area of PAWS under UK Woodland Assurance Standard (UKWAS) certification and any PAWS receiving forestry grants, having been surveyed and an appropriate restoration plan produced to secure and enhance surviving ancient woodland communities.

Delivery of biodiversity targets for priority species and habitats

The revised **Scottish Forestry Strategy needs to drive enhanced biodiversity work in public and private sector woodland, meeting Scotland's national, UK, EU and international biodiversity commitments.**

This includes **improving the biodiversity condition of Scotland's native woods** – to meet UK Biodiversity Action Plan targets and designated site condition - **restoring important open ground habitats**, such as active blanket bog, that is currently non-native plantation forestry or neighbouring designated non-woodland sites adversely impacted by it. The revised strategy must also drive the **restructuring of key existing forestry plantations for priority species**, and promote **the restoration of ancient woodland sites** currently planted with non-native forestry plantations.

This will require large-scale restructuring of the national forest estate, and private sector management, to benefit priority species; working with state and private forest managers for habitat management, and encouraging both sectors to remove non-native forestry plantations from important open ground habitats.

Climate Change

Forestry needs to adapt to climate change but can also play a key role in adaptation of society to climate change. We believe that the **prominence given to rapid sequestration of carbon is misplaced**. We also believe that the emphasis should not be on sequestration but on the adaptation capabilities of forestry in areas such as water management and soil conservation.

European Landscape Convention commitments

The revised Scottish Forestry Strategy needs to **implement the European Landscape Convention**¹.

Sustainable forest management

The **Scottish Executive must ensure that international commitments on sustainable forestry are properly implemented** via the Scottish Forestry Strategy and the Scottish Rural Development Plan (SRDP). The current SRDP and SFGS consultation proposals do not meet this, in particular by reducing the scope of the UK Forestry Standard.

The strategy needs a **commitment to only fund UK Woodland Assurance Standard (UKWAS) woodlands, or woodlands aspiring to UKWAS status by 2010**. This will help Scottish Executive to meet its international commitments on increasing UKWAS uptake. The new Scottish Forestry Strategy needs a **commitment to maintain the Scottish National Forest Estate's UKWAS certification**.

b) Detailed comments

Section 1 – Context

Page 14, 'Climate Change' - paragraph 1.4.8

- Adaptation - We support the need for both adaptation and mitigation measures.
- Mitigation - We support the role of forest products in providing alternative fuel sources and as substitutes for energy rich building materials.
- Sequestration – whilst forests clearly have a role in sequestering carbon as part of climate change mitigation, we believe that the uncertainty surrounding the future impact of climate change on forests themselves makes inclusion of forests as a mitigation measure speculative and environmentally unwise.

¹ ELC Article 5 – General measures

Each party undertakes:

* To recognise landscapes in law as an essential component of people's surroundings, an expression of the diversity of their shared cultural and natural heritage, and a foundation of their identity;

* To establish and implement landscape policies aimed at landscape protection, management and planning through the adoption of the specific measures set out in article 6;

* To establish procedures for the participation of the general public, local and regional authorities, and other parties with an interest in the definition and implementation of landscape policies mentioned in paragraph b above;

* To integrate landscape into its regional and town planning policies and in its cultural, environmental, agricultural, social and economic policies, as well as in any other policies with possible direct or indirect impact on landscape.

- Education – we strongly support the need for education to create greater awareness of climate change.

Page 13, 'Sustainable Development' - paragraph 1.4.12

We strongly support the aim of Scotland's forests being an exemplar of sustainable development; in particular the need to manage within environmental limits. Whilst we would endorse the need to base actions on sound scientific evidence, we would highlight the need, identified in Principle 15 of the United Nations Declaration on the Environment and Development, that "in order to protect the environment, the precautionary approach shall be widely applied by States according to their capabilities. Where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation"².

This forms one of the guiding principles in the UK's shared framework for sustainable development, 'One Future – Different Paths'³, and the Scottish Executive's 'Choosing Our Future: Scotland's Sustainable Development Strategy'⁴, from which the final bullet point of this paragraph appears to have been derived.

We would therefore suggest that a final bullet point is amended to fully reflect the wording in the framework principle;
basing decisions on sound scientific evidence, whilst taking into account scientific uncertainty (through the Precautionary Principle) as well as public attitudes and values.

Page 14, 'Economic Development' - paragraph 1.4.14

The indirect value of forestry in supporting tourism, improving public health, adding to the value of landscapes, enhancing biodiversity and in providing opportunities for developing community cohesion and social justice must be fully considered in any economic assessment.

Page 15, 'Economic Development' - paragraph 1.4.20

We strongly support the development of local economic value through the production of high quality timber and non-timber products including fuelwood. We are concerned that all forest management meets the UK Woodland Assurance Standard (UKWAS), and the harvesting of non-timber forest products is environmentally sustainable and does not directly or indirectly damage, remove or disturb priority biodiversity.

Page 16, 'The Wider Social Agenda' - paragraph 1.4.28

We strongly support the view that degraded local environments contribute to a poor quality of life. Equal opportunity to a high quality local environment and access to open spaces is fundamental to people's well-being.

Page 18, 'Enhancing biodiversity' - paragraph 1.4.38

We would like to see a stronger statement of support for protection of ancient and semi-natural woodland. Paragraph 1.4.38 must also include priority species, non-woodland habitats impacted by forestry as well as woodland habitats.

Page 19, 'Making Connections' - paragraph 1.4.46

We strongly endorse the need to take action at a landscape scale, to build more robust open ground and forest habitat networks, and to strengthen natural processes.

Page 20, 'Enhancing the Historic Environment' - paragraph 1.4.50

We strongly support the importance attached to veteran or heritage trees as part of our cultural heritage, and as an important biological resource.

Page 21, 'Urban' - paragraph 1.4.57

We support action to develop greenspace networks within towns and cities, that meets national biodiversity targets, doesn't disturb sensitive wildlife, and protects historic and archaeological interest. We would like to see this reflected in the Key Theme targets and indicators.

² United Nations (1992) Rio Declaration on Environment and Development, Principle 15

³ DEFRA (2005) 'One Future - Different Paths', p. 8

⁴ Choosing Our Future: Scotland's Sustainable Development Strategy,
<http://www.scotland.gov.uk/Publications/2005/12/1493902/39032>

We support the idea of high quality, biodiverse woodlands to deliver a better quality of life for Scotland's people.

Section 2 - Vision

Page 24, 'Our Vision for 2025 and Beyond', first bullet point.

Woodland expansion needs benefit priority biodiversity, archaeological and historic interest – not damage it.

The Macaulay study, based on constraints, should merely be the starting point for consideration of a figure for woodland expansion which should be based on need, constrained by the factors considered by Macaulay Institute.

Page 24, sixth bullet point 2025

We recommend amending the second sentence to: 'Restoration (to native woodland) of Plantations on Ancient Woodland Sites is well underway towards a target of at least 70% and ideally 90% by 2050'.

Page 24, eighth bullet point

We support the refocusing of the national forest estate towards provision of public benefits. We would expect that the estate would have a higher proportion of native woodland than 40% - building on at least a majority of the state forest being native woodland. This would also include delivery of priority woodland and non-woodland species and habitat biodiversity targets, and managing the majority of the estate by environmental low impact silvicultural systems.

We would recommend amending the vision statement for 2025 for this bullet point to;

- *The national forest will comprise 60% native woodland by 2050.*

There should be a vision for certification to increase UKWAS uptake, consisting of a commitment to retain the National Forest Estate's UK Woodland Assurance Standard (UKWAS) certification, and a commitment to only fund (UKWAS) woodlands, or woodlands aspiring to UKWAS status by 2010.

Outcome 3, page 27, Objective: 'Help to protect & enhance biodiversity'

Missing an objective to create and enhance open-ground habitat networks, as well as forest habitat networks.

Key Theme 1 – Climate Change

Page 30, Key Theme 1: Climate Change, paragraphs 2.4.1 & 2.4.2, 'Purpose' & 'Why do this': Scottish Environment LINK is concerned that:

- carbon sequestration' may not bring real carbon benefits;
- emphasis on carbon sequestration could mask discussion of genuine emissions reductions, and adaptation to climate change;
- Sequestration forestry objectives could conflict with biodiversity objectives including efforts to protect, enhance and restore open ground habitats, such as blanket and raised bogs.
- Poorly located, designed and managed plantation forestry can damage biodiversity – the UK Forestry Standard must be applied to all energy/carbon offset/carbon sequestration/biomass forestry, including short rotation coppice, short rotation forestry and all other woodland planting and management.

Page 30, paragraph 2.4.4, 'What needs to be done – adaptation'

Adaptation has two elements in this context. Firstly adaptation of the sector to the possible impacts of climate change such as species selection and silvicultural regimes. Secondly, the role that forestry might play in helping human society and biodiversity to adapt to change. Whilst this may be implicit in the section on adaptation, we believe these two distinct functions need to be made explicit here.

We recommend amending this section to;

2.4.4 Adaptation

- *Develop an adaptation strategy, based on research advice, for Scottish forestry sector, with the following focus:*
 - *Ecological adaptation;*
 - *Pests diseases and abiotic (e.g. fire) threats; and*
 - *Silvicultural and forest operations.*
- *Develop an adaptation strategy, based on research advice, in support of the Executive's Scottish Climate Change Programme, which will help Scottish society to adapt to climate change, with the following focus:*
 - *Ecological adaptation*
 - *Environmental protection (e.g. soil conservation, flood alleviation etc.)*

We recommend amending the bullet point to;

- *Ensure sequestration contributes fully towards the commitments in the forthcoming Scottish Climate Change Programme, as one of the objectives in the creation of new woodland.*

Any mitigation measure must demonstrate a reduction in net carbon emissions.

Page 31, paragraph 2.4.9, 'What type of woodland' - fourth bullet point

We do not believe that there is a valid environmental case, either from a climate change mitigation or biodiversity conservation perspective, for favouring faster growing species for carbon sequestration.

Page 32, paragraph 2.4.10, 'Key Targets'

There is no inclusion for targets in relation to adaptation of the forestry sector. For example the measurement of habitat functional connectivity using computer modelling systems

Key Theme 2 – Business Development

We support the development of economic potential of Scotland forests provided this is consistent with the tenets of sustainability, in particular the protection and enhancement of priority biodiversity and archaeological interest.

We support the use of wood as a substitute for other building materials in the construction industry and within Scottish and local government procurement. In particular the use of local sources of timber and the development of local processing as part of this use, and to help in addressing issues related to 'wood-miles' and creation of employment.

Page 34, paragraph 2.5.6, 'Targets'

There are no targets for the development of local timber processing, for increasing use of local timber or for increasing use of timber as a substitute for other building materials. .

Pages 34-35, Key Theme 3 – Community Development

This section confuses urban agenda with community development. We recommend the inclusion of targets which demonstrate increasing community involvement, a greater recognition of the social and environmental value of woodland in the development control process, and increasing participation in 'back-to-work' and volunteering schemes.

Pages 36-37, Key Theme 4 - Learning and skills

As with other themes our main concern relates to the lack of targets against which progress can be measured.

Key Theme 5 – Access and inclusion

Page 39, paragraph 2.8.6, 'Targets'

We recommend amending the targets to;

By 2015

- *At least 75% of the population should have access to at least one area of accessible woodland greater than 2hectares within 500m of their homes*
- *At least 95% of the population should have access to at least one area of accessible woodland greater than 20hectares within 4km of their homes*

Pages 40-42, Key Theme 6 – Environmental protection

As with previous themes we would like to see some targets to allow performance to be monitored against this theme.

Key Theme 7 - Biodiversity

Page 42, paragraph 2.10.2 – ‘Why do this’: first bullet point

This needs to include ‘priority species’.

Page 43, paragraph 2.10.3 – ‘What needs to be done’: species & habitats, first bullet point.

Add in ‘Special Protection Areas and Ramsar sites’.

Page 44, paragraph 2.10.5 – ‘Where?’ (focus on the following priorities): first bullet point, ‘woodland condition’

This needs to include Special Protection Areas.

Page 44, paragraph 2.10.5, second bullet point – ‘woodland restoration’

We are keen to see PAWS restored, but also subsequently managed to benefit priority species. Some open woodland species e.g. the pearl-bordered fritillary survives in some plantations purely because they are managed as such - restoration to native woodland would be great for them, but not if it resulted in a dark, totally unmanaged woodland.

We recommend amending this to;

- *Woodland restoration: non-native PAWS giving high priority to those sites within existing or potential habitat networks (or large sites outwith such networks) and where remnant ancient woodland communities are at highest risk.*

Page 44, paragraph 2.10.5, fourth bullet point – ‘open-ground habitat restoration & expansion’

This needs to include ‘in or adjacent to Special Protection Areas, Ramsar sites... and for Species Action Plan species ...and sites that contribute to open-ground habitat networks...’

There needs to be a strategic approach to open-ground habitat restoration, ensuring that for priority biodiversity there is support for up to 100% removal of a forest, as is permitted under the EIA and Felling Licences, but currently restricted to 20% of a forest area under the existing SFGS (the proposed SFGS doesn’t fund any removal).

Criteria for prioritising open-ground sites & habitats for restoration need to be developed and should include:

- a. Listed as a UK Biodiversity Action Plan priority open-ground habitat with restoration targets;
- b. Direct benefit to Scottish Biodiversity List species and habitats, UK BAP priority species, or be a key UK Biodiversity Action Plan (UK BAP) or Priority/Annex 1 habitats under the EU Habitats Directive;
- c. Will enhance the biological condition of designated sites, and adjacent areas⁵ – SSSI, NNR, SAC, SPA, Ramsar;
- d. Restoration potential – presence of key remnant features, and technical ability to improve condition;
- e. Scale of restoration must be adequate and produce viable habitat linkages to existing areas/networks of target habitats.

Page 44, paragraph 2.10.5, fifth bullet point – ‘woodland species’

This needs to include non-woodland species impacted by forest management.

Page 44, paragraph 2.10.6 – ‘Key Targets’

This needs to include an open-ground habitat restoration targets based on UK Biodiversity Action Plan priority habitats (HAPs) – blanket bog, lowland raised bog, upland heathland and coastal sand dunes – see above criteria in response to paragraph 2.10.5.

For restoration of Plantations on Ancient Woodland Sites (PAWS), there needs to be a target to have begun the full restoration to native woodland of a further 9000 hectares of PAWS, with the remaining area of PAWS under UK Woodland Assurance Standard (UKWAS) certification. There also needs to be a linked target for any PAWS receiving forestry grants, or

⁵ This includes for ‘woodland’ & ‘non-woodland’ designated sites, species & habitats; such as improving botanical SACs & SSSIs that are surrounded by forestry, e.g. by pulling back forest edges to expand species rich grassland.

other state funds, having been surveyed and an appropriate restoration plan produced to secure and enhance surviving ancient woodland communities.

We are keen to see PAWS restored, but also subsequently managed to benefit priority species.

Page 45, paragraph 2.10.8 – ‘Key Indicators’, third bullet point

This needs to include the number of declining UK Biodiversity Action Plan (UKBAP) species and habitats. This Indicator must connect with the Scottish Biodiversity Strategy Indicator List and the UKBAP reporting round.

An indicator is needed on the area of woodland with approved deer management plans, and the length of deer fence removed and marked in high risk areas for priority bird strike – capercaillie and black grouse.

There needs to be some targets/indicators for the retention, restoration and enhancement of priority open ground habitats and transitional habitats (montane scrub, tree line).

Key Theme 8 - Timber

We support the development of markets for local timber, particularly where this drives appropriate management of native woods, where wood is being used to substitute for high-embedded carbon building materials, and where it can contribute to a reduction in roundwood road miles.

It would be helpful if under the targets and indicators there were some measures that could monitor how effective the strategy is in achieving these outcomes.

Page 46, paragraphs 2.11.6 & 2.11.7 – ‘Targets’

We recommend adding a bullet point;

- *Local timber processing using Scottish grown timber will have increased by x (dependent on the establishment of baseline figures).*

Section 3 - Delivery

Page 48, paragraph 3.5.2, ‘The national forest estate’:

We strongly support the view that the role of Scotland’s national forest estate is to **address market failure in the provision of social and environmental public benefits** – the strategy needs to clearly explain how this will be achieved

We are supportive of the role that the State Forest might play in the delivery of the Scottish Forest Strategy. We feel this is best expressed through **the delivery of public benefits**. We include in this high value conservation areas, the provision of publicly accessible woodland, the development of open ground and forest habitat networks, including an expansion in the area of native woodland at a landscape scale, the restoration of PAWS and work for priority species and habitats.

On this basis we support a **flexible approach to the disposal and acquisition of land** to achieve a shift in emphasis, provided the public benefits which arise from those woods that are sold are protected and enhanced. This approach could be innovative with land transfer, so that public money is not wasted on buying and selling, particularly between public bodies.

The new **Scottish Forestry Strategy needs to drive enhanced biodiversity work in public sector woodland, meeting Scotland’s national, UK, EU and international biodiversity commitments.**

Scottish Environment LINK hopes that new Scottish Forestry Strategy will **fully implement the recommendations of the Scottish National Forest Estate Environment Review Group**. This requires clear biodiversity targets in revised Forestry Commission Scotland Forest District Strategic plans, backed up by suitable budgets to ensure effective, targeted delivery on the ground for priority biodiversity. This includes action for woodland and non-woodland priority species and habitats.

The new Scottish Forestry Strategy needs a **commitment to maintain the Scottish National Forest Estate’s UKWAS certification.**

We are concerned that the **neither the current forestry strategy, nor the proposed strategy addresses the current development pressures and actual development on the National Forest Estate**, for example for windfarms and housing. We are concerned that the state forest is being considered by the Scottish Executive as a land bank for development, outwith the public benefit considerations of the Scottish Forestry Strategy and Scottish Biodiversity Strategy.

Page 49, paragraph 3.6.1, 'Regulation'

We welcome the move to make **Forestry Commission Scotland a statutory consultee** of planning applications involving felling more than 0.25 hectares (paragraph 3.6.2).

The UK Forestry Standard must apply to the implementation of this strategy, by all arms of government.

Page 49, paragraph 3.6.4, 'Grants & External Funding': We support the overall aims outlined in 'Grants and funding'. It is essential that the Scottish Executive take a strong lead in ensuring that funding is in place to allow Forestry Commission Scotland, together with partners in the **private and voluntary/community sectors to plan activity with confidence**.

In order that any programmes and targets within the strategy can be converted into tangible action and delivery, it is essential that full consideration is given to **funding to support he delivery**. We are particularly concerned about the over commitment of SFGS funds and the lack of investment that will be available over the next 5 years to deliver the Strategy aims.

We welcome that the proposed **Scottish Forestry Strategy identifies the need to 'support the implementation of the Scottish Biodiversity Strategy'**⁶ – it is unfortunate that the proposed Scottish Forestry Grants Scheme does not recognise this one of its purposes (see 'Principles' on page 4 of the [SFGS consultation](#)).

We are concerned that **as key delivery mechanism for the Scottish Forestry Strategy, the proposed SFGS/SRDP doesn't sufficiently recognise its role in delivering the Scottish Biodiversity Strategy**.

The proposed **revised SFGS/SRDP completely omits mention of the Scottish Executive's 2002 World Summit on Sustainable Development commitment**⁷ to increase the area of Scotland's woodland certified under the **UK Woodland Assurance Standard (UKWAS)**. The Scottish Forestry Strategy and the SFGS and SRDP should be a vision for certification to increase UKWAS uptake, a commitment to only fund UK Woodland Assurance Standard (UKWAS) woodlands, or woodlands aspiring to UKWAS status by 2010.

The **UK Forestry Standard** – which implements the Ministerial Conference for Protection of Forests in Europe (MCPFE) agreements - **must be applied across all parts of the SRDP**⁸, which includes Tiers 2 and 3 of the proposed Land Management Contracts⁹, as well as the revised Scottish Forestry Grants Scheme (SFGS). The current SRDP and SFGS consultation proposals do not meet this.

This is an **undesirable reduction in the environmental regulation of woodland planting and management** stemming from the Scottish Forestry Strategy and its delivery mechanisms. It could result in the creation of woodland of low intrinsic biodiversity value, or poorly located planting on non-woodland habitats of high biodiversity value, neither of which meet Scotland's biodiversity or sustainable forest management commitments:

- in the Scottish Biodiversity Strategy & its Scottish List of priority habitats and species;
- for UK Biodiversity Action Plan priority habitats – including upland heathland, blanket and raised bogs - and species;

⁶ Page 27, Outcome 3, 'Helping to protect & enhance biodiversity' objective, 1st Bullet Point.

⁷ See: www.ukforestpartnership.org.uk

⁸ The 2007-13 EU Rural Development Regulation Strategic Guidelines requires member states to implement the MCPFE agreements across the whole RDR.

⁹ **Tier 2 Measures:** Investment in Holdings – 'Access for sustainable forest management'⁹; Woodland creation – 'Small scale woodland creation <1 hectare'

Tier 3 Measures: Maintaining Landscape Character – 'Tree protection & management in a designed landscapes', 'Screening farm & forestry structures'; Management of Woodland & Scrub – 'Management of ancient wood pasture', 'Forest Environment Payments', 'Woodland improvement', 'Woodland restructuring'; Woodland Creation – 'Woodland creation >1 hectare'.

- in respect to the EU Gothenburg 2010 biodiversity target (an an EU Rural Development Regulation objective);
- for EU priority species and habitats under the EU Birds and Habitats Directives;
- & sustainable forestry commitments under the Ministerial Conference for Protection of Forests in Europe (an EU Rural Development Regulation objective).

Such woodland planting and management would also contradict SEERAD and Forestry Commission Scotland's duty to further biodiversity under the 2004 Nature Conservation (Scotland) Act.

Page 51, paragraph 3.7.1, 'Required Action'

We are concerned that the proposed Scottish Forestry Strategy **lacks a clear action plan and a commitment to deliver it**. The strategy document needs to explain the process of turning the strategy into action.

The proposals for the **Scottish Rural Development Plan, including the revised Scottish Forestry Grants Scheme, miss out much of the delivery of the valuable biodiversity elements of the proposed SFS**, for example on open ground habitat restoration and restructuring for black grouse, capercaillie, pearl-bordered fritillary and chequered skipper.

The strategy needs to actually deliver better integration with SRDP and other land management (or evidence of a timetable and process to achieve this).

The new **Scottish Forestry Strategy needs to be backed up by effective delivery mechanisms for key public benefits, in particular biodiversity, archaeology and landscape conservation**. We really hope that the Scottish Forestry Strategy's objective of 'ensuring biodiversity is taken into account in all decision making' happens.

2. Environmental Report

a) General comments

The Environmental Report fails to address the issues of how the UK Forestry Standard is likely to be differentially applied in the implementation of the strategy. This raises real issues of concern in relation to inappropriately located and designed forestry planted under Tier 2 and Tier 3 of the Scottish Rural Development Plan – none of which will require UK Forestry Standard compliance.

Afforestation of non-agricultural land could be detrimental to biodiversity, for example high quality moorland planted using the SRDP Tier 2 woodland creation measure (<1 hectare). Apart from direct loss and damage of priority habitat, the resultant woodland could be of low biodiversity value due to its small size, isolation and inappropriate tree species. Under current proposals, the UK Forestry Standard's environmental checks and balances on the location, design and specification of woodland planting wouldn't be applied to such situations, and all other Tier 2 measures and Tier 3 woodland creation.

For afforestation of non-agricultural land, the landowner may not be in receipt of Single Farm Payment under Tier 1, so Good Agricultural and Environmental Condition would not apply and neither would the UK Forestry Standard. The Tier 2 Woodland Creation measure is 'for providing benefits for habitats and species'.

b) Detailed comments – none.