

## Response ID ANON-MZ2Y-MT1T-R

Submitted to **The Future of Forestry in Scotland**  
Submitted on **2016-11-02 12:21:53**

### Introduction

**Are you responding as an individual or an organisation?**

Organisation

**What is your name or your organisation's name?**

**Name/orgname:**

Scottish Wildlife Trust

**What is your email address?**

**Email:**

bwilson@swt.org.uk

**The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:**

Publish response only (anonymous)

**We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?**

Yes

**Please indicate which category best describes your organisation. If you are a representative or umbrella body, please tick the category you represent:**

Third sector

**If 'other', please state here::**

### New organisational arrangements in Scotland

**1 Our proposals are for a dedicated Forestry Division in the Scottish Government (SG) and an Executive Agency to manage the NFE. Do you agree with this approach?**

Not Answered

**Please explain your answer:**

The Scottish Wildlife Trust can see positives and negatives regarding the proposal to create a dedicated Forestry Division with the Scottish Government (SG) and an Executive Agency to manage the National Forest Estate.

The Trust is of the opinion that with regard to policy, operations and regulation Forestry Commission Scotland (FCS) is consistently one of the better performing agencies in Scotland. The Trust would seek assurances and a detailed description of how this would continue if FCS was amalgamated into the SG.

The Trust has some concerns that, under the proposals, new forestry policy could become biased towards maximisation of the commodity value of timber products, rather than considering the full range of values that sustainable forest management can and should deliver.

With regard to Forest Enterprise, the Trust would not expect this change to have a large impact on current management and there could be potential benefits with regard to cost savings and the potential to better integrate land use objectives including forestry, agro-forestry, biodiversity conservation, deer management and climate change mitigation and adaptation.

**2 In bringing the functions of FCS formally into the SG, how best can we ensure that the benefits of greater integration are delivered within the wider SG structure?**

**In bringing the functions of FCS formally into the SG, how best can we ensure that the benefits of greater integration are delivered within the wider SG structure? :**

Across the SG and its agencies the Scottish Wildlife Trust thinks that there is a serious disconnect between policy aspirations and the 'rhetoric of integration' and its actual implementation on the ground. This is most notable with the Land Use Strategy, Scottish Biodiversity Strategy and Climate Change strategies. However, of all the public bodies, FCS and Forest Enterprise have the best track record of implementation, particularly around deer management and the some promising measures to design-in features to enhance biodiversity in new productive plantations.

In bringing the functions of FCS formally into the SG there is the potential to create better overall read-across between departments and potentially better integrate high level policy across portfolios with resultant better delivery. The Trust agrees with Scottish Environment LINKs proposal to conduct an assessment of the effectiveness of existing Divisions with regard to implementing current policy and strategy aims before adding additional burdens.

It would be essential that specific knowledge and expertise relating to sustainable forest management and biodiversity knowledge is retained within any new division created and there is not a 'flooding-in' of generalist civil servants.

**What additional benefits should we be looking to achieve? :**

### **3 How should we ensure that professional skills and knowledge of forestry are maintained within the proposed new forestry structures?**

**How should we ensure that professional skills and knowledge of forestry are maintained within the proposed new forestry structures?:**

The Trust would expect staff with specialist knowledge to be retained and this applies not only to forestry expertise but to a whole range of areas including biodiversity and education.

It is essential that staff in the proposed new structure who are charged with managing NNRs and open ground habitats have specialist ecological and environmental expertise.

### **4 What do you think a future land agency for Scotland could and should manage and how might that best be achieved?**

**What do you think a future land agency for Scotland could and should manage and how might that best be achieved?:**

A future land agency for Scotland could potentially manage all and any public land, however, the remit for this management must concentrate on delivering a full range of public goods and not concentrate only on delivering narrow economic interests through 'commodity maximisation'.

## **Effective cross-border arrangements**

### **5 Do you agree with the priorities for cross-border co-operation set out above, i.e. forestry research and science, plant health and common codes such as UK Forestry Standard?**

Yes

### **6 If no to question 5, what alternative priorities would you prefer? Why?**

**If no to question 5, what alternative priorities would you prefer? Why?:**

These would be the most important priorities for Scottish Wildlife Trust. With regard to plant health it should be kept in mind that vectors of plant disease do not respect boundaries so it is essential that co-operation is maintained.

### **7 Do you have views on the means by which cross-border arrangements might be delivered effectively to reflect Scottish needs?**

**Do you have views on the means by which cross-border arrangements might be delivered effectively to reflect Scottish needs? :**

Given the amount of plantation forests in Scotland and the amount of forestry specific knowledge / research capacity in Scotland it would be essential for a comprehensive Memorandum of Understanding or similar to be drawn up. It would make sense for Scotland to take the lead on many of these arrangements due to its expertise. The Scottish Wildlife Trust is of the opinion that Forest Research is carrying out very important work with regard to ecosystems services and it is important that this can continue and that information is shared and used across the UK.

## **Legislation and regulation**

### **8 Should the Scottish Ministers be placed under a duty to promote forestry?**

No

### **9 What specifically should be included in such a general duty?**

**What specifically should be included in such a general duty?:**

'Forestry' is a term that denotes the science or practice of planting, managing, and caring for forests. This would therefore be a duty without a clear policy purpose.

The most important recommendation the Scottish Wildlife Trust wishes to make in this submission is that Ministers should be placed under a duty to promote 'sustainable forest management' aimed at delivering a range of social, economic and environmental goods.

This recommendation would be consistent with Scotland's international commitments under the United Nations Sustainable Development Goals, in particular Goal 15.2 which states that "by 2020, promote the implementation of sustainable management of all types of forests, halt deforestation, restore degraded forests and substantially increase afforestation and reforestation globally". We would recommend using the same or very similar language contained within Sustainable Development Goal 15.2 on the face of the Bill.

Our woodlands should be viewed as renewable natural capital assets. If sustainably managed, these assets will continue to supply a flow of goods and services to private owners and the public. These goods and services include carbon storage and sequestration, water regulation and purification, flood amelioration, habitat provision for wildlife, recreation, health and well-being benefits and education.

**10 Recognising the need to balance economic, environmental and social benefits of forestry, what are your views of the principles set out in chapter 3?**

**Recognising the need to balance economic, environmental and social benefits of forestry, what are your views of the principles set out in chapter 3?:**

Policy and practice in relation to forest management has moved on significantly since the 1960s and 70s. The Scottish Wildlife Trust does not think it is appropriate to simply copy and paste the obligation under section 1(3A) of the Forestry Act 1967. A new set of principles should put greater emphasis on achieving healthy forest ecosystems and the goods and services that we could derive from these restored ecosystems.

**Assessing impact**

**11 Are there any likely impacts the proposals contained in this consultation may have on particular groups of people, with reference to the 'protected characteristics' listed in chapter 4? Please be as specific as possible.**

**Are there any likely impacts the proposals contained in this consultation may have on particular groups of people, with reference to the 'protected characteristics' listed in chapter 4? Please be as specific as possible.:**

None that are apparent.

**12 Do you think that the proposals contained in this consultation are likely to increase or reduce the costs and burdens placed on any sector? Please be as specific as possible.**

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The Trust have concerns that public land that is not seen as commercially valuable will be sold off and could potentially be mismanaged by private interests. We believe such land should be subject to conservation easements if sold.

The Trust is concerned that environmental expertise from the existing staff may be lost.

The Trust would like to see more detailed proposals to properly assess the strategic environmental impacts of this proposal.

**Evaluation**

**Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)**

**Matrix 1 - How satisfied were you with this consultation?:**

Neither satisfied nor dissatisfied

**Please enter comments here.:**

**Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:**

Slightly satisfied

**Please enter comments here.:**

Free text for all options is best