

Protecting Scotland's wildlife for the future

Hilda M Todd

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Dear Ms Todd

RE: CONSULTATION ON THE STRATEGIC DIRECTIONS FOR THE NATIONAL FOREST ESTATE DOCUMENT

The Scottish Wildlife Trust¹ welcomes the opportunity to comment on the Strategic Directions for the National Forest Estate Document

The Scottish Wildlife Trust's central aim is to advance the conservation of Scotland's biodiversity for the benefit of present and future generations. We have a 25-year vision for Scotland in which we want to see a network of healthy, resilient ecosystems supporting expanding communities of native species across large areas of Scotland's land, water and seas.

We believe the way forward to protect and enhance Scotland's biodiversity and wildlife is to adopt an ecosystem approach to nature conservation and for society to recognise that healthy ecosystems are the foundation of Scotland's prosperity. The conservation of biodiversity is key to ecosystem health; without thriving biodiversity, ecosystems begin to malfunction, are less resilient to change and lose significant value. Our policy for Forestry and Woodland can be viewed on the Scottish Wildlife Trusts website as can our Living Landscapes document that sets out our view on ecosystem-based conservation.

Woodland provides substantial benefits to both wildlife and people. As the former climax vegetation community over much of Scotland, woodland and scrub supports more species than any other terrestrial habitat, particularly ancient semi-natural woodlands which are the surviving descendants of our original natural forests. These are vitally important, irreplaceable reservoirs from which wildlife can begin to spread back into newly restored habitat thereby helping Scotland's ecosystems to recover from centuries of degradation. In addition to supporting much of our biodiversity, woodland provides highly valued social and economic benefits to Scotland's people.

General Points

We are pleased that the document is seen within the wider policy context and that the Forestry Commission Scotland (FCS) aims to "align our work with the Scottish Governments Land Use Strategy" (LUS). However, to truly align with the LUS the document must make greater reference to the ecosystems approach and ecosystem services as these are the key concepts of the LUS.²

We hope that when the new Scottish Biodiversity Strategy (SBS) comes online in the near future that it is fully taken into account in the strategic direction of the FCS. Forestry has a vital role to play in

¹ The Scottish Wildlife Trust's central aim is to advance the conservation of Scotland's biodiversity for the benefit of present and future generations. With over 32,000 members, several hundred of whom are actively involved in conservation activities locally, we are proud to say we are now the largest voluntary body working for all the wildlife of Scotland. The Trust owns or manages 120 wildlife reserves and campaigns at local and national levels to ensure wildlife is protected and enhanced for future generations to enjoy.

² For more information on the Ecosystems Approach please refer to the Scottish Governments information note available from: <http://www.scotland.gov.uk/Publications/2011/03/16083740/1>

helping Scotland meet its 2020 “Aichi” biodiversity targets.³ It is hugely important that the SBS and LUS are mainstreamed across all government directorates to allow decision makers to move towards delivering truly sustainable development.

Scottish Wildlife Trust believes the FCS should aim to create maximum public benefit from public money; therefore protecting and enhancing biodiversity will be central to this aim. Woodlands must be managed with both multifunctionality in mind and the impacts that management can have on ecosystem services and non marketable public goods, e.g. reducing the impact of extreme weather events within a catchment.

CONSULTATION SECTIONS

1 Treasured

The Scottish Wildlife Trust is pleased to note that biodiversity and natural heritage in Scotland’s Forest Estates is recognised as being one of its greatest assets and that it helps contribute to people’s sense of belonging and place. As much as possible should be done to conserve and protect this huge asset to Scotland’s society and economy.

2 Healthy

This section of the document should highlight that connectivity is very important to habitat and species health and genetic diversity, especially in the face of climate change.

Scottish Wildlife Trust would prefer to see more details on plans to deal with invasive non native species. We would like to see plans and strategies that deal with not only problems for the forestry sector but also other stakeholder groups as well. Monitoring and evaluation is essential to the success or otherwise of these programmes.

3 Productive

The Scottish Wildlife Trust welcomes greater use of quality native hardwoods, however, we would emphasise that the right tree must be planted in the right place furthermore the existing ancient woodland resource must be protected from any further loss or degradation and there should be no net loss of native woodland.

The Trust is supportive of integrating farming and forestry and believes that this can have benefits for soil fertility, structure and water retention as well as wildlife. We do not support blanket increase in productivity of all agricultural land as this can have serious impacts on biodiversity. Careful regard must be given to the impacts that changes in grazing regimes and crop growth can have on wildlife and ecosystem services.

We note the large contribution that the forest estate plays to the tourism economy each year. As biodiversity is central to this, money must be invested in extensive habitat restoration programmes to ensure that people will view Scotland as an attractive destination in the future.

5 Cared for

Scottish Wildlife Trust strongly believes that ‘plantations on ancient woodland sites’ (PAWS) must be restored to at least 85% native species (scattered throughout the canopy). Priority must also go to semi-natural ancient woodlands which are in unfavourable ecological condition, often as a result of overgrazing by wild deer and/or domestic stock. The target should be to bring all degraded ancient woodland (both PAWS and non-PAWS) into favourable or improving condition.. A significant proportion of the ancient woodland resource should be retained as long-term retention stands with a high proportion of veteran trees and ‘old growth’.

³ For a full list of the targets please refer to: <http://www.cbd.int/sp/targets/>

We are pleased that the importance of open habitats is recognised and that plantation forestry will be removed in inappropriate places.

6 Good Value

Please refer to comments about public goods and ecosystem services above. The Environment Review of the National Forest Estate carried out in 2006 stated that, "The net cash funding regime, within which the agency operates, tends to subordinate the delivery of public benefits to the generation of income." This must not be allowed to happen and budget decisions involving public should be made more transparent.

7 Priorities and Progress

FCS has a significant role to play in protecting and enhancing Scotland's Biodiversity. The Trust would like to see comprehensive monitoring and reporting of habitats and species across the estate. This monitoring and reporting will be important to help justify the use of public money.

Yours sincerely,

Bruce Wilson
Living Landscapes Policy Officer