



**Consultation response to Scottish Forestry**

# **Forestry Grant Scheme**

**Scottish Wildlife Trust**

*17 May 2023*

***Scotland has high level ambitions for both nature and climate. In order to deliver, in the context of the Forestry Grant Scheme, we need to reframe this as a tool which can invest in nature and climate for the benefit of people and the planet.***

The Scottish Wildlife Trust welcomes this opportunity to respond to the Scottish Forestry consultation on the draft Future Grant Support for Forestry.

## Our Response

### Question 1

Do you agree that grant support for forestry should continue to be improved and developed as a discrete scheme within the overall package of land support?

- Yes  
 No  
 Not Sure

Yes. Investment is needed to support Scotland's efforts to tackle the nature emergency, meet our woodland targets and halt biodiversity loss by 2030<sup>i</sup>. However, for Scottish woodlands and forests to flourish, we must ensure that the right tree is planted in the right place for the right reason and that trees are managed appropriately. In order to achieve this, we need better holistic landscape planning and management including the use of opportunity mapping to plan where green and blue infrastructure is prioritised.

Securing a budget allocation from the net zero, energy, and transport portfolio (including an appropriate budget for the statutory forest agency) is vital.

More than ever, policy coherence and better integration with other key land use objectives and policy, such as agriculture, peatland restoration and natural flood management, is key. The Trust would like to see greater use of Regional Land Use Partnerships and Nature Networks to help aid prioritisation and improve community involvement.

We agree with Scottish Environment LINK recommendations around diversification of age structure of woodlands, and increasing support landholdings with existing native woodlands.

### Question 2

Are there any changes that would allow for better complementarity between the forestry and agriculture funding options?

- Yes  
 No  
 Not Sure

Yes. There is broad agreement that we need a far greater level of complementarity we would recommend the following:

- Use of Regional Land Use Partnerships and opportunity mapping under Nature Networks to help inform funding for nature across a variety of public and private funding sources. We recommend FGS civil servants liaise with Nature Scot Civtech team and Nature Networks team to ensure coherence.
- Use of opportunity mapping provided by Nature Networks to help signpost the best areas to afforest on farms avoiding areas which are sensitive, i.e., for ground nesting birds and avoiding areas that are better for food production.
- The use of whole farm plans in connection with Nature Network opportunity mapping to produce well-planned on farm woodland schemes, which are coherent with neighbouring farms plans – this funding would probably be best situated in Tiers 2, 3 and with larger schemes in 4. There should be incentives in place for cooperative action, particularly in the riparian zone, given the multiple benefits this can provide.

- Stipulating reduced grazing pressures from sheep/cattle in areas where deer are being controlled.
- Increase promotion of the Forestry Cooperation Fund (FoCo) as a useful funding alternative that can be used by local consultants or eNGOs to fund the design of collaborative woodland schemes.
- Make Streamlined Funding accessible through and linked with the Forestry Grant Scheme application procedure for plan preparation. Currently, only exceptionally committed farmers and landowners can complete the extremely comprehensive application process for funding since it is difficult, and all done online. The only other option is to hire a costly consultant who might not get their money back if the application is unsuccessful.
- Continue to allow Basic Payment Scheme (BPS) to be claimed on areas of land under FGS or Agri-Environment Climate Schemes (AECS) and on schemes delivered out with FGS and AECS funding.

### Question 3

How can the support package for forestry evolve to help tackle the climate emergency, to achieve net zero, and to ensure that our woodlands and forests are resilient to the future climate?

To tackle the climate emergency, amongst other things, we need a significant increase in the quantity and improvement in the quality of Scotland's native woodlands to the extent that they are making a substantial contribution to the restoration of degraded terrestrial ecosystems in both rural and urban environments.

We feel the answers to this question are also addressed in other questions, and to avoid extreme levels of repetition, please take our response as a whole and not as an individual answer for purposes of analysis.

The support package should prioritise schemes which focus on the following policy areas <sup>ii</sup>:

- Protection - the existing ancient woodland resource must be protected from further loss or degradation, and there should be no net loss of native woodland.
- Enhancement - the ecological condition and cultural heritage value of the whole woodland resource should be substantially improved.
- Expansion - native woodland cover should be substantially increased through strategically located planting and by encouraging natural regeneration. This will contribute to biodiversity, soil protection, water regulation, climate change mitigation and adaptation, habitat network development, and enhancement of visual landscapes.
- People and woodlands - policies and incentives should be designed to ensure more people can experience woodland wildlife, particularly through education, recreation, and community woodland initiatives.
- Woodland enterprises - the timber industry and other woodland-dependent enterprises should be exemplars of sustainable development and contribute positively to the biodiversity value of woodland.

Climate Change is now relatively well-mainstreamed across Government policy. However, we must quickly ensure nature degradation is considered on par with the climate crisis and implement solutions that simultaneously tackle both issues. Over the long term, tackling these crises independently will lead to an oversight of the best solutions for people, climate, and nature. For example, only planting fast-growing, non-native tree species in monocultures would quickly capture carbon but can have negative impacts on biodiversity and surface water.

The Scottish Government prioritises transitioning to a well-being economy: "*Our economic transformation aims to fundamentally reshape our economy, delivering a just transition to a net zero, nature-positive economy based on the principles of equality, prosperity, and resilience.*"<sup>iii</sup> To achieve

this, we need to develop approaches which allow biodiversity to thrive whilst delivering climate adaptation and mitigation. Nature-based Solutions<sup>iv</sup> can tackle the twin crisis holistically and offer positive social results: improving our health and well-being, increasing equality, and reducing the risk of natural disasters<sup>v vi</sup>. The multiple benefits provided through the protection and restoration of biodiversity mean that, with proper resourcing and management, the value supplied by biodiversity will be much greater than other alternative investments. This will help the economy and people prosper over the long term. To tackle the twin crisis, encouraging Natural-based solutions is an urgent necessity.

Along the way, there are critical recommendations for key opportunities for forest expansion, which we agree with Scottish Environment LINK on:

- Stimulate an increase in natural colonisation and regeneration, assessing success after 15 years instead of the current indicated five years to increase certainty.
- Recommending a "natural supplement" for natural colonisation under buffering ancient woodland and as a part of the Plantation on Ancient Woodland Site (PAWS) restoration.
- Ensure forest diversification on species, age, and structure for resilient forest enhancement. The goal should be meeting the new UK Forestry Standard (UKFS) for any single species at 65% and offer a 'resilience supplement' to those schemes below 65%.
- Reach native woodland land area covers of 7% by 2030 and 10% by 2045.
- Promote efficient and transparent consultation and adapting schemes.
- Ensure that new plantations on open grounds result in no loss of priority species or habitats through improved prior assessments.
- Promote reduction of habitat fragmentation and deliver connectivity with areas of high-nature value.

The Scottish Wildlife Trust want to see new opportunities for productive native broadleaves under a Nature-based solution approach and supports projects that consider a natural capital assessment. These should look at the full value of the benefits we derive from nature, not just the market value.

Riverwoods is an ambitious initiative launched in early 2019 by the Scottish Wildlife Trust to create a network of riparian woodlands supporting healthy and resilient river systems across Scotland. Benefits of riparian woodland include lowering water temperatures, reducing floods, controlling diffuse pollution, promoting biodiversity, and creating ecological links. However, under the current scheme, timber production is the only ecosystem service given significant value. Riverbank planting projects of the kind designed to protect our ecosystem score low on "Value for Money" (VFM) because they are often linear by nature and require a relatively high capital input in relation to the area planted. For instance, the FGS VFM criterion only examines the planted area ratio to the grant amount allotted to tree protection, including fences. As a result, many requests are typically denied, and stock fencing and protection via tree tubes are the only options available (regardless of whether they are appropriate for the site). Based on our expertise, we believe that:

- Wider and equally significant advantages should be considered when evaluating value for money.
- Facilitating cooperative action, using the riparian zone as a focus, under local Nature Networks would make the work of Riverwoods much more achievable.

#### Question 4

Private investment through natural capital and carbon schemes can make a valuable contribution to climate change.

Do you agree that the grant support mechanism should have more flexibility to maximise the opportunities to blend private and public finance to support woodland creation, and if so, how might this be achieved?

- Yes  
 No  
 Not Sure

In our opinion, there is a huge opportunity, which we must not miss, for FGS to blend private and public finance to support woodland under a natural capital approach. To achieve this, we must have several things in place:

- Scale – Currently, small-scale planting schemes do not provide the scale needed for private finance to be viable. To get schemes to scale, we need coordination under the pre-existing Government mechanisms provided by the Land Use Partnerships/Frameworks and the Nature Networks that NPF4 requires Planning Authorities to create within Local Development Plans. This approach would ensure that private and public money for numerous projects was deployed coherently and is more effective at combating the nature and climate crisis whilst also giving communities meaningful ways to engage, collaborate and influence.
- Principles - The Government needs to put the [Interim Principles for Responsible Investment in Natural Capital](#) on a statutory footing. This would contribute to achieving a Just Transition and actively involve communities in the large-scale land-use change that must happen to meet our climate and nature targets. We know from experience around planning policy that "shoulds" – i.e. "*Investment and management decisions **should** demonstrate consideration of positive and negative impacts across all four capitals*" – mean very little in practice for developers/investors. If this requires new legislation, the Government must bring this forward quickly. Many have warned of a potential "wild west" for new private finance schemes, and we must move quickly to prevent this.

The FGS should seek to support and give priority to schemes which have taken account of and utilised opportunity mapping provided under Nature Networks. This would allow private schemes which had been identified under opportunity mapping to dovetail seamlessly with publicly funded schemes.

[The Scottish Forum on Natural Capital](#) and its [Sustainable Land Management Working Group](#) and the [Nature Finance Pioneers](#) Group would be well placed to help develop the flexibility needed. [The Riverwoods Finance Group](#) would also provide an ideal point of reference to develop this new type of blended financing within the riparian zone.

## Question 5

How could the current funding package be improved to stimulate woodland expansion and better management across a wide range of woodland types, including native and productive woodlands?

Woodlands are essential for Scotland's environment, climate, culture, society, and economy. We encourage the FGS to consider this wide range of interests. Focusing on softwood production predominantly locks us to a single non-native species, bringing resilience issues and weakening our response to climate change, pests, and diseases.

The current package could be improved to stimulate woodland expansion and improve management through:

- Using opportunity mapping under Scottish Government Nature Networks to help identify the highest priority and maximum benefits for ecosystem health/service delivery.
- Supporting collaboration at a large-scale level.
- Diversifying woodland species, mainly with hardwoods and broadleaves, whilst providing age profiles of new and restructured forests. This leads to recovering economic resilience, better adaptation to climate change and smooth production curves over time.
- Encouraging the multiple uses of trees for integrated land use, recognising the full range of benefits from woodlands and trees. Nature-based solutions can play a significant part in rural environmental management: They provide climate adaptation, carbon sequestration, and biodiversity benefits whilst tackling other societal challenges locally, nationally, and globally.

- Prioritising and supporting legislation on statutory deer management and effective control of grey squirrels with a landscape-scale approach. Deer intensity is the leading cause of the lack of woodland regeneration in Scotland's swathes, and voluntary management approaches have failed. Moreover, fencing and walling strategies for deer management contribute to habitat fragmentation. Grey squirrel populations pose a substantial risk to both production and native forest creation and expansion<sup>vii</sup>.
- Committing to creating new wood pasture and High Nature Value farming with silvopasture/agroforestry systems<sup>viii</sup>.
- Promoting funding for projects that relays on measuring inclusivity or sustainability. Economic growth should not be the only outcome. Supporting nurseries, which provide local provenance trees for woodland planting projects in the surrounding areas<sup>ix</sup>, and reserves, which can bring back Atlantic woodlands at a landscape scale generating benefits for people and wildlife<sup>x</sup>, should also be a priority.
- Increasing payment for tree and understorey aftercare and the fencing grants for habitat recovery per metre. Fencing grants have either not risen in a decade or lagged behind inflation, like other regular costs.
- Funding to plant and sow a field layer of native wildflowers and grasses to the most desirable National Vegetation Classification (NVC community). As crucial requirements of a monitoring grant for Habitat Impact Assessment (HIA), the grant needs to carry out this type of survey and corresponding monitoring of the understorey development as well.
- Integrating a strategy, since grants must function inside and outside woodland areas. This is crucial for cross-cutting concerns like *Rhododendron ponticum*.
- Allowing narrower planting widths where necessary, taking into account wider outputs, and providing a suitable finance alternative, for example, to riparian woodland projects. FGS needs a minimum width of 15 metres, which is sufficient for many regions but typically makes the idea inappropriate on arable land.
- Allowing flexibility in planting density and/or open ground space where it is acceptable. The current planting density requirements are too rigid and ill-suited to the actual difficulties of highland planting. The standard planting density for broadleaved trees under FGS is 1600 stems per hectare. However, modern riparian zone management on a forestry plantation permits the restocking of native trees at a rate of 1100 stems per hectare. Although, for higher margins (for black grouse, treeline forests, or juniper woodlands), a low-density planting option (at 500 stems/ha) is already available; this choice is ineligible in a riparian design proposal.
- Finishing the Land Use Strategy (LUS) mapping pilot, combining the necessary mapping data sets, and implementing it nationally. As part of the LUS project, Tweed Forum and partners have already created sophisticated NFM Woods for Water and diffuse pollution maps that could easily be integrated with Marine Scotland's spatial data sets for temperature monitoring. This would simplify identifying high-priority regions where planting trees would be most beneficial, and it is an approach that can be implemented country-wide.
- Considering Watergates as a capital item under the FGS, grant-aided at 80% to 100% of the real cost at a site-specific level, with an increased maintenance allowance for the component area where watergates are considered. The long-term viability of a riparian planting programme depends on watergates, which are by their very nature vulnerable to damage from flood events and can be expensive and time-consuming for the landowner.
- Prudent usage of fencing is advised. Grant help from the FGS for fence marking should be provided in cases where it can be demonstrated that bird strike poses a risk to species other than black grouse and capercaillie. Deer fencing must also only be supported if the land manager can demonstrate that they are actively involved in deer management and control fencing is a last resort due to factors beyond their control.
- Encouraging sustainable forest design along with management. We suggest a special grant designed for expanding and restoring rainforests.
- We agree with Scottish Environment LINK on increasing support for existing woodland management and ensuring the effective use of public funding through funding restrictions. Holdings that manage ancient woodlands, PAWS, or Caledonian Pinewood Inventory must demonstrate positive management before expanding.
- We agree with the Alliance for Scotland's Rainforest on:
- All PAWS should be under restoration by 2025<sup>xi</sup>. All locations in conifer plantations with veteran or old trees should be restored, even if they don't fit the map-based description of "PAWS". The older or more ancient trees can be given a buffer zone so they have room to grow and flourish



in the environment. To assist in developing a strategy for PAWS restoration, grants should include the costs of a consultant lichenologist and bryologist.

- Providing targeted funds that will help PAWS in the rainforest region get back on the long term. Regular monitoring is essential to ensure that public money is well spent and the desired outcome is achieved, so we propose that the grant mechanism includes a requirement to do a follow-up survey three years after the initial clearance. Based on this survey, additional funding applications can be made for follow-up treatment phases.
- Grants need to be supported by a strategy for Scotland, or at least for the rainforest zone-scale, with the following elements: direction on rhododendron management from the Scottish Government; built-in legacy for projects to prevent re-invasion so commitment to long-term management, monitoring and funding; a clear and robust process for the use of regulatory powers (SCOs and SCAs) by statutory agencies and statutory agencies beginning to exercise those powers. This can ensure that current public spending is better targeted and achieves better outcomes.

## Question 6

Do you agree that it should be a requirement of grant support that woodlands are managed to ensure that they become more resilient to the impacts of climate change and pests and disease?

- Yes
- No
- Not Sure

How can the grant scheme support this?

We propose the following:

- Grant-funded projects should be required to go above UKFS requirements and we support the Scot LINK suggestion on "resilience supplement".
- Requiring woods supported under publicly funded schemes to be planned through Nature Networks opportunity mapping. This ecosystem-based approach to landscape scale management allows forest managers, land owners, and crofters to seek opportunities and create strategies for effective adaptation to climate change.
- Requiring a minimum of 60% of native trees in all new planting. According to Scottish Forestry, 42% of the woodland created in 2021 was new native species woodland<sup>xii</sup>. That needs to reach at least 60%, including productive hardwoods and specific species according to the planting area. Woodland creation incentives need to encourage greater diversity (genetic variability, species, age, structure and silvicultural system) for better resilience and delivery of a wider range of ecosystem services.
- Supporting woodland removal on peat habitats for habitat and biodiversity restoration<sup>xiii</sup>.
- Supporting long-term carbon sequestration, considering that end uses of timber that likely release carbon (fuel woodland) should not be promoted<sup>xiv</sup>.
- Promoting diversification to avoid tree pests and diseases. The forestry sector is still mainly processing Sitka spruce. Diversification is crucial to building a more resilient timber sector. This is particularly true given the growing biosecurity risk in a changing climate. Native woodlands and commercial non-native plantation forestry should contribute to either biodiversity enhancement or ecosystem services provision<sup>xv</sup>.
- Requiring proactive and efficient management of grey squirrels and other INNS across the landscape to preserve and promote robust, healthy forests<sup>xvi</sup>.
- We agree with Scottish Environment LINK on protecting biodiversity in open habitats "*that the FGS support for afforestation applications is made conditional on avoiding the loss and/or damage of priority habitats and species, with any unavoidable losses of priority open habitat offset by native woodland habitat creation*".

### Question 7

Which of the following measures would help reduce the barriers for crofters and farmers wanting to include woodland as part of their farming business? Please select all that apply.

Better integration of support for woodland creation with farm support mechanisms	<input checked="" type="checkbox"/>
Knowing where to get reliable advice	<input checked="" type="checkbox"/>
Clearer guidance on grant options	<input checked="" type="checkbox"/>
Flexibility within options	<input checked="" type="checkbox"/>
Intervention level	<input type="checkbox"/>
Support with cashflow	<input type="checkbox"/>
Information on how current land use could continue with trees integrated throughout	<input checked="" type="checkbox"/>

Are there others not listed above?

Woodland on farms should be considered as part of the whole farm plan process; this, in return, should be linked to the wider Nature Network of the area and the Land Use Partnership/Framework. To this end, a well-resourced Advisory Service is absolutely vital.

We agree with Scottish Environment LINK that in the case of agroforestry *“there needs to be support for integrated approaches rather than just planting patches of trees on farms. That is why the schemes should sit where they are most likely to be accessed by farmers: we recommend that silvoarable and silvopastoral options, hedgerows, copses and buffer strips, including riparian buffer strips are options available through Tier 2 and Tier 3 agricultural payments.”*

For riverwoods, we suggest:

- The introduction of new capital infrastructure options (troughs/pipes) for alternate irrigation strategies under FGS options.
- Comprehensive woodland creation plans, by definition, block animal watering access to the water flow. There are no capital item alternatives available through FGS right now to install different watering systems. When farmers, in particular, are considered, this is a serious drawback. Under Agri-Environment Climate Schemes (AECS) funds, alternative watering methods are available; however, these awards are challenging to qualify for without a sizable and complete entire farm programme (expensive and dangerous to develop).

### Question 8

Establishing small woodlands can have higher costs. What specific mechanisms would better support small scale woodlands and woodland ownership?

We would call into question the blanket affirmation that “establishing small woodlands can have a higher cost”. Firstly, we need to consider the kind of woodland (size, type, age, etc.) that should be considered. Secondly, we must consider if such commercial assessments consider the non-market value<sup>xvii</sup> of the small woodlands and the environmental valuation of the benefits mentioned above.



"Sustainable forest management" means the stewardship and use of forests and forest lands in a way and at a rate that maintains, and where appropriate, enhances, their biodiversity, productivity, regeneration capacity, vitality, and their potential to fulfil, now and in the future, relevant ecological, economic and social functions at local, national and global levels, whilst ensuring it does not cause damage to other ecosystems." <sup>xviii</sup> We believe the following considerations can support small scale woodland ownership:

- Considering small integrated land-use woodlands, such as agroforestry/ trees on farms schemes, in the context of an opportunity-mapped Nature Network could increase their coherence and improve overall ecosystem health.
- We agree with Scottish Environment LINK in that "*The FGS application process is onerous for small schemes. Most individuals are unable to apply without the help of a professional forestry agent. Preparing a proposal for a small scheme can require almost as much input as for a larger scheme, thus agent costs for small schemes are disproportionately high. The introduction of a modest 'planning grant' for small schemes (say 0.25-5ha) would help to overcome this barrier.*"
- Options to support better deer management would be welcomed. However, fencing supplements should only be provided to those that can demonstrate active deer management and control.

## Question 9

How can forestry grants better support an increase in easily accessible, sustainable managed woodlands in urban and peri-urban areas?

The forestry grant will support a sustainably managed woodland in urban and peri-urban areas by:

- Supporting policy coherence between the Forestry Strategy and other related policies, such as the National Planning Framework 4, the Regional Land Use Frameworks, and the Land Use Strategy, delivering green infrastructure investment.
- Only implementing grey infrastructure - such as roads and railways lines - that leads to habitat fragmentation if it has gone through a mitigation hierarchy approach. Any unavoidable loss should be replaced with net-gain approaches under a nature network opportunity map.
- Promoting green infrastructure that uses natural principles to enhance connectivity in rural and peri-urban contexts.
- Promoting Nature Based Solutions such as woodland development that can contribute to the development of green corridors for people and nature.
- Using opportunity mapping under Scottish Government Nature Networks to help identify the highest priority and maximum benefits for ecosystem health/service delivery.

## Question 10

How can grant support for forestry better enable rural communities to realise greater benefits from woodland to support community wealth building?

We would encourage land use planning and engagement through Regional Land Use Partnerships and local Nature Networks.

The Coigach & Assynt Living Landscape, a partnership program between Assynt Foundation, Culag Community Woodland Trust, Eisg Brachaidh Estate, John Muir Trust, Kylesku Estate, Tanera Mor and the Scottish Wildlife Trust, is an example of an initiative that works with crafters, landowners, and local people to develop resilient ecosystems that deliver ecosystem services for people. It aims to achieve ecosystem restoration by enhancing and reconnecting habitats (primarily native woodlands) and promoting rural employment and volunteering opportunities<sup>xix</sup>.

## Question 11

How can the forest regulatory and grant processes evolve to provide greater opportunities for communities to be involved in the development of forestry proposals?

The grant processes can evolve to provide greater community opportunities by:

- Continuing facilitating and guiding with workshops to complete the forms for specific audiences.
- Adapting the system to better support applicants. Farmers, crofters, and land managers could not afford the cost of engaging agents and get excluded from a successful application process.
- Revisiting the current complexity of the application process through the data that the statutory forestry agency can collect about the groups that apply and those that are more often rejected. Are always the reasons for rejection incomplete paperwork or wrongly filled-up forms? Is it possible to give the applicants a revision period to upload complementary documents or update forms?
- Extending the eligibility zones. The SSRS is a joint initiative - between The Scottish Wildlife Trust, NatureScot, Forestry and Land Scotland, Scottish Forestry, Scottish Land and Estates, and RSPB Scotland with funding support from Heritage Lottery Fund, Loch Lomond and the Trossachs National Park Authority, and Aberdeen City Council- managing the grey and protecting red squirrels so they may remain an important component of Scotland's unique national biodiversity<sup>xx</sup>. Today, grey squirrel control funds are restricted to some project areas regions for eligibility, despite other woods and communities being able to make significant advancements and increase community involvement in squirrels and more extensive INNS management in forests. Fife is one of the areas that could be considered.
- We support the recommendations of the LINK "[UKFS: A call to enhance the 'people' theme](#)", and some of our local members were involved in drafting this document.
- Our members have repeatedly called for greater transparency around information available online for new schemes. This should be brought into line with planning for buildings, etc...with online portals for viewing maps and plans and leaving comments.

## Question 12

How can the forestry regulatory and grant processes evolve to ensure that there is greater transparency about proposals and the decisions that have been made on them?

- Make the application process more accessible and avoid discouraging a possible applicant from applying. Currently, the application must be made by a landowner or an agent. In cases where a landowner does not have the confidence or skills to complete the process online, they need to pay a fee for an agent to do it in their stead. This can discourage them from applying. The grant could provide free knowledgeable assistance for paperwork review that could enhance application numbers.
- Scottish Forestry should embed the necessary capacity to provide adequate ecological and technical expertise to support and advise FGS-funded grey squirrel control. As evidenced by the heavy involvement of Saving Scotland's Red Squirrels in FGS-funded squirrel efforts to date, technical support from dedicated squirrel staff is a requirement for the Scheme to operate effectively. The ecological knowledge for effective squirrel control is often out with a

typical forestry professional's background. This has been the rationale for SSRS involvement to date - but it is now time to bring this critical knowledge base in-house. This will make decision-making clearer and more linear.

- Explaining in layperson's terms how the studies about the complex and bureaucratic approval procedures for tree planting<sup>xxi</sup> have been considered for the ongoing improvements on the scheme<sup>xxii</sup>. This can help applicants better understand the new approach and feel some recognition of the claims being made.
- Revitalising the process by continuously engaging with stakeholders. Working with conservancies on leading seminars on cases of study can be beneficial to share knowledge with current and upcoming grant applicants, along with improving the relationship and sharing the know-how of all parties involved<sup>xxiii</sup>.
- Sharing information. Meetings, briefings, press, and sharing the evaluation process<sup>xxiv</sup> of each proposal directly with the project owner and, in general terms, with the community, can better comprehend how the application process works. Complementing reports and statistics<sup>xxv</sup> with infographics and posters can improve the understanding of the process and its results.
- Streamlining how the application process gathers information for its improvement. Currently, there are references and research that can guide the process. Still, there is also information that relies on anecdotal evidence. Contrasting points of view should need to be examined more closely<sup>xxvi</sup>.
- Sharing practical cases of success by making available up-to-date examples of successful applications. In particular, these should provide information about their suggested land use.
- We agree with Scottish Environment LINK on: "*considering a clear criteria for assessing the cumulative impact of schemes in an area are developed and published - this has become an urgent need in parts of the country where commercial forestry has expanded rapidly to profoundly change local land cases*".

### Question 13

Forestry grants have been used to stimulate rural forestry businesses by providing support with capital costs. Do you agree that this has been an effective measure to stimulate rural business?

- Yes
- No
- Not Sure

a. How could this approach be used to support further forestry businesses?

The Scottish Wildlife Trust has been supporting the Little Assynt Tree Nursery. This project generates trees and shrubs from native stock for native woodland schemes. Producing from native stocks can count on suitable soil and climate conditions and enhance the surrounding biodiversity. The nursery produces oak, birch, rowan, hazel, Scots pine, juniper and dwarf birch, holly, and wych elm, reaching nearly 60,000 trees annually<sup>xxvii</sup>. There, FGS should continue supporting and boosting local investment, addressing the skill shortages, giving opportunities for green jobs growth, taking advantage of the local know-how, and expanding a healthy, low-risk forest for cover expansion.

b. How could this approach be used to support further skills development?

The forestry and the woodland sector have skills gaps that have not been addressed in the rural sector and are needed to meet net zero and the nature-positive target. Knowledge sharing is essential for ongoing development and efficiency promotion of skill, knowledge transfer, and innovation. Increasing the forestry workforce's size and improving their skills can be done through:

- Accredited short training and, more specifically, long-term training to build capacity<sup>xxviii</sup>. Training and resources can help practitioners improve their business correctly and benefit

nature. For instance, grant beneficiaries should be given easy access to training programmes that increase their understanding of and expertise in managing and controlling grey squirrels and protecting woodland.

- We agree with Scottish Environment LINK regarding the need to develop apprenticeships focused on continuous cover woodland and the industry it supports.

## Question 14

How could the FGS processes and rules be developed to encourage more companies and organisations to provide training positions within the forestry sector?

- Add a condition to grants over a certain threshold that they must provide a level of peer-to-peer learning/apprenticeship linked with courses provided by SRUC and others.
- This apprenticeship and learning are particularly relevant to deer management, where there is a huge demand for growth in the workforce.
- We support Scottish Environment LINK's wider points.

## Question 15

The primary purpose of FGS is to encourage forestry expansion and sustainable forest management, of which a key benefit is the realisation of environmental benefits. How can future grant support better help to address biodiversity loss in Scotland, including the regeneration and expansion of native woodlands?

Leadership is needed to take the initiative in the biodiversity crisis. The five direct drivers of biodiversity loss identified by IPBES (Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services) are:

1. Land and sea use change
2. Direct exploitation of animals and plants for food and materials
3. Climate change
4. Pollution
5. Invasive non-native species

Also, IPBES emphasises the existence of indirect drivers, such as people's disconnect with nature and their lack of recognition of the value and importance of nature.

The FGS plays a role in addressing all the drivers that need to be taken into account to achieve the upcoming targets of the Scottish Biodiversity Strategy. It can reduce biodiversity loss and promote resilient ecosystems by:

1. Prioritising funding for projects encouraging forestry expansion and sustainable forest management conditional to targeted outcomes for biodiversity by 2024. That will set a strong government position on mandatory biodiversity net gain and show coherence with policy frameworks such as the recently released Scottish Biodiversity Strategy. Our recommended approach is to target funding for the regeneration and expansion of native woodlands which have been planned through Nature Networks opportunity mapping. The Scottish Wildlife Trust has previously outlined the need for national coordination of local Nature Networks, as biodiversity does not respect borders. There are six priority areas where action must be taken for Nature Networks to advance effectively and timely in Scotland<sup>xxix</sup>.
2. The FGS grant can directly improve the Atlantic salmon life cycle, supporting them from upland burns and rivers to the open ocean. The connection between salmon and forest has been thoroughly studied, revealing that salmon can accumulate nutrients like nitrogen that end up in

the canopy of the forest, nourishing plants and animals far inland<sup>xxx</sup>. Trees can benefit from salmon, and reciprocally, salmon can benefit from trees: "Fallen leaves attract the aquatic insects the juvenile fish feed on. The nutrients that leach from organic debris even make their way to the ocean, nourishing plankton growth that makes salmon's main diet"<sup>xxxi</sup>.

Offset the exploitation of animals and plants for food and materials through habitat enhancement by:

- Supporting habitat restoration in priority locations to maximise productivity, condition, and survival of salmonids, to counteract the effects of climate change, overfishing and other external pressures<sup>xxxii</sup>.
  - Supporting low-quality agricultural/high biodiversity value land planting based on a compulsory habitat survey and research of biological records funded by FGS. Therefore only projects that could demonstrate net positive biodiversity impact can be funded by the scheme. This approach switches from a forestry planting as a driver of biodiversity loss to an opportunity to enhance long-term biodiversity.
3. Contributing to tackling climate change by:
- Prioritising funding for multipurpose forests. Through a nature-based solutions<sup>xxxiii</sup> approach, these can deliver multiple benefits to tackle the climate change and biodiversity crises holistically.
  - Promoting an ecosystem approach in environmental management that integrates land management, water, and living resources for conservation and sustainable use will contribute to a balance<sup>xxxiv</sup>.
  - Reassuring support for conservation efforts. Reserve management can benefit both people and wildlife. The work is varied, from protecting ospreys to peatland restoration and bringing back Atlantic woodlands at a landscape scale, along with the pioneering use of livestock to maintain a high level of biodiversity.
  - Supporting a 'nature supplement'. Targeting natural colonisation by buffering ancient woodland as part of the Plantation on ancient woodland site (PAWS) restoration can encourage natural colonisation and regeneration. Simultaneously, this would protect communities from flooding, soil erosion, landslides, storing carbon, and enhancing biodiversity.
  - Supporting the management of montane forest transitions into alpine vegetation<sup>xxxv</sup> instead of promoting the expansion of species like Sitka spruce, which requires further studies on biodiversity responses<sup>xxxvi</sup>.
  - Protecting peatlands and other open habitats that allow carbon sequestration, promoting ecosystem restoration of open ground adjacent to woods that are buffering around native woodlands.
  - We need at-scale, cross-policy, cross-industry, cross society action. The historical approach of only tackling either nature or climate crisis individually represents a considerable challenge we must overcome.
4. As highlighted in Scotland's Biodiversity Strategy, "Healthy riparian woodlands are critical for the health of water systems and bodies, but they are in decline in coverage and condition. Poorly vegetated upper catchments and canalised river systems exacerbate downstream flash flooding events". We see the potential of FGS to support multipurpose woodlands that can improve surface water quality and promote flooding protection and salmon fisheries improvement. Moreover, Scotland's third River Basin Management Plan (2021-2027) goal to attain 81% of the water environment to be in good or better condition by 2027<sup>xxxvii</sup> is a target that must be supported through tree planting. The Scottish Wildlife Trust has been working since 2019 with many organisations and landowners through The Riverwood program, building expertise on water management, promoting partnerships for project delivery, and building a blueprint for Scotland-wide delivery, reinforced by solid evidence and open data<sup>xxxviii</sup>. We support the development of various traditional and innovative funding mechanisms that can have a key role in decontamination projects based on native woodland expansion.
- Sending a strong message about tackling water pollution by:
- Encouraging the execution of projects with a wide range of stakeholders and interested parties to undertake river restoration projects that improve riparian habitats, potentially delivering significant benefits to people and wildlife.
  - Supporting forestry agency officers on forestry and water guidelines interpretation to maximise the benefit for riparian areas.



- Continuing to support the expansion of Scotland's beaver population by:
  - Supporting agricultural landowners to make space for beavers on productive land.

The objective of the mitigation and management hierarchy (accommodation > mitigation > translocation > lethal control) set out in Scotland's Beaver Strategy (SBS)<sup>xxxix</sup> is to avoid the use of lethal control to manage beavers wherever possible. However, in areas where beavers come into conflict with agriculture, licenses for lethal control are still regularly granted<sup>xl</sup>. The reintroduction of beavers to Scotland has the potential to bring enormous ecological benefits through wetland habitat creation, pollution control and flood and drought attenuation<sup>xli</sup>. If we are to realise these benefits, we must find ways to accommodate beavers in the places that they naturally expand to. We believe that there is an opportunity for FGS to support agricultural landowners to make space for beavers along riverbanks that border productive land. FGS could build up on its '[Woodland's for Water](#)' woodland creation option by administering a grant available to all farmers to allow them to create riparian buffer strips on their arable / grazing land. The grant should include a yearly per-hectare payment that fairly reflects the potential losses in production from changes in land-use. This would be similar to the grant currently administered by the Agri-Environment Climate Fund (AECS; due to end in 2024), which offers £495.62 per hectare per year for '[Water margins on Arable Fields](#)'. We recommend that the FGS option aimed at making space for beavers should stipulate a wider minimum buffer width than AECS. A 10m<sup>xlii</sup> minimum would better allow for beaver foraging, burrowing, and the potential widening of the watercourse due to damming.

We believe that, if there was uptake on this option, it would help to reduce the need for lethal control or translocation of beavers, by improving the ability of farmers to live alongside these animals. Furthermore, the distancing of agricultural activities from waterbodies, coupled with riparian planting, would also bring many benefits for biodiversity and ecosystem health, for example, through improved water quality, water temperature regulation, and bank stabilisation, all of which would benefit stream invertebrate and fish communities – e.g. freshwater pearl-mussel and Atlantic salmon<sup>xliii</sup>.

5. The Scottish Wildlife Trust considers that non-native invasive species are a significant and increasing threat to biodiversity in Scotland<sup>xliv</sup>. Moreover, one of the future outcomes of Scotland's Biodiversity Strategy recognises that "Harmful invasive non-native species (INNS) will be managed so that established INNS no longer degrade native habitats and species or impede their restoration and regeneration and new introductions are managed quickly and effectively". To achieve that, we support non-native invasive species individual assessments. Since 2009, the Saving Scotland's Red Squirrels (SSRS) partnership has coordinated a national effort to keep grey squirrel incursion at bay through strategic, targeted control in priority areas. As a crucial supporting component of this coordinated landscape approach, Scottish Forestry, an SSRS partner, has offered grants to landowners within the priority areas to carry out grey squirrel control on their land under the sustainable woodland management category of the Forestry Grant Scheme (FGS). To date, the grey squirrel control portion of FGS has required significant input and technical support from SSRS officers<sup>xlv</sup>, who have identified the need for the following improvements in the grant system:
  - **Underpinning in-house capacity and technical support by Scottish Forestry.** As evidenced by the heavy involvement of SSRS in FGS-funded squirrel efforts to date, technical support from dedicated squirrel staff is a requirement for the Scheme to operate effectively. The ecological knowledge for effective squirrel control is often common in a typical forestry professional's background. This has been the rationale for SSRS involvement to date, but it is now time to bring this critical knowledge base in-house.
  - **Requiring trapping training for FGS estate trappers.** Training should align with SSRS Standard Operating Procedures or comparable standards. For example, volunteers carrying out grey squirrel control on FLS lands now undergo required accredited training. This training scheme could be broadened to be offered to everybody carrying out control on public lands or elsewhere with public funds, such as FGS recipients. In their dealings with FGS estates, SSRS



staff have frequently seen evidence of ineffective trapping. A training requirement could help to rectify this.

- **Encouraging site-specific trapping effort and trapping schedule.** The trapping effort required to successfully suppress local grey squirrel numbers will vary on a site-by-site basis. This should be agreed upon during a preliminary site visit according to grey squirrel professional advice and reviewed on an ongoing basis.
- **Updating landowner guidance in line with SSRS recommendations.** Estates must be required to follow the SSRS Standard Operating Procedures, or comparable standards, for trapping. This guidance document should be made available on the Rural Payments and Services (RPS) and/or other appropriate websites. Existing guidance on the RPS website MUST be updated as several important weblinks are currently broken.
- **Monitoring FGS estates and better practice enforcement.** In some cases, suboptimal trapping could be identified by an ongoing statistical review of trapping returns to minimise the monitoring resource requirement. For example, cases of consistently low or consistently high capture numbers could trigger a site visit to investigate trapping methods.
- **Updating the data submission and processing system.** Making better use of digital capabilities to streamline the system and integrate reporting directly with national data repositories (i.e. the SSRS Hub) would reduce barriers to compliance, reduce the resource requirement for processing returns, and would better facilitate landscape planning and conservation efforts.
- **Reviewing fund allocation within the grey squirrel control element of FGS.** Scottish Forestry should assess how FGS grey squirrel control funding can be allocated more optimally within the Scheme, considering the expense associated with the technical support and professional input required for its effective delivery. More directly allocating funds towards these professional costs would provide a better return on investment by mitigating suboptimal trapping and helping to ensure a consistent landscape approach to grey squirrel management. For example, in England, the Forestry Commission administers a per-hectare payment incorporating grey squirrel control and red squirrel conservation measures. This can be used to contract local squirrel experts (often rangers from regional red squirrel groups) to carry out necessary monitoring, trapping and control efforts. This approach allows for a better balance of investment towards technical support and monitoring and could be used as a model for updates to the Scottish scheme.

*Rhododendron ponticum* affects lichens, bryophytes, and the native trees that sustain them. It can only be cleaned at the population level by ensuring that the cleared region can be defended after clearing it to thwart reinvasion. Also, Sitka spruce can occasionally turn into an INNS when seeds into a rainforest environment. The present Woodland Improvement Grant (WIG) option to remove Sitka spruce when it becomes an INNS should be kept in place. Still for long-term resilience and financial savings, preventative measures should be considered in forest planning through advice and legislation. For instance, buffer zones can be set up to prevent dispersal into environments like rainforests and other natural areas. To avoid harm to native habitat, invasive Sitka spruce should ideally be eradicated when still young.

We agree with the Alliance for Scotland's Rainforest on:

- Working on grants that function at the population level necessitates the establishment of mechanisms to sometimes deliver beyond the woodland line into an environment that is not woodland.
- Promoting cooperation between landowners and communities and comprehensive landscape scale management plans.
- Setting aside resources to track the rhododendron's expansion in the region that has to be under control.

We also support Scottish Environment LINKs wider points.

## Question 16

Herbivore browsing and damage can have a significant impact on biodiversity loss and restrict regeneration. How could forestry grant support mechanisms evolve to ensure effective management of deer populations at:

Landscape scale?

We support Scottish Environment LINK's answer to this section. Supporting the protection and restoration of woodlands identified by the Native Woodland Survey of Scotland are important priority aims for the FGS and it is vital for both Riverwoods and the Atlantic Rainforest Project.

## Question 17

If you wish to make any other relevant comments, please do so in the text box below.

Scotland has a crucial opportunity to be recognised internationally as a country that both walks the walk and talks the talk on climate and nature. But to achieve this, there is a need for a mainstreaming biodiversity delivery across Government and revision of delivery mechanisms such as the FGS will be key.

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