

Ministerial Foreword - Forestry in Scotland is a sector that we can be justly proud of.

1 - Introduction and Rationale for Providing Grant Support for Forestry

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

Please explain your answer in the text box.:

While we see theoretical advantages in greater integration with other channels for land support, we do not believe this is an appropriate moment to divert the resources needed to attempt a change of such magnitude to an acceptable standard. There is too much else changing, and too significantly, in the wider context of land management that the FGS already needs to adapt to.

These significant changes are primarily driven by the climate and nature emergency, creating urgent needs to:

- support the management of our existing native woodlands as vital long term carbon stores and refugia for biodiversity – redressing the balance between this and woodland expansion;
- support for woodland expansion should be ongoing and place much greater emphasis on natural regeneration over the planting;
- supporting deer management that reduces deer browsing pressures at landscape scale, rather than primarily fencing, is directly related to the above and fundamental to sustainability;
- placing priority on restoring ecological condition in Caledonian pinewoods, Scotland's Rainforest and mountain woodlands;
- support more diverse woodlands, especially in productive woods and especially in commercial forestry;
- related support for local businesses using more diverse timber and silviculture as ways of contributing to community wealth building.

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

Yes

Please explain your answer in the text box.:

Livestock

The FGS needs to take account of the potential for livestock grazing supported by agriculture funding to undermine woodland funding objectives – changes in deer management alone will not be sufficient to achieve many of the FGS' aims. FGS-supported projects should therefore be accompanied by a herbivore management plan, as described in our answer to Q16.

Riparian woodlands

Biodiversity, flood management and water quality would all receive a major boost in Scotland with increases in riparian woodland in farmed landscapes. Significantly increasing support for riparian woodland is one of the best value for money investments the FGS can make. We would like to see a grant for riparian woodland creation available to all arable and livestock farmers, with a yearly per hectare payment that fairly reflects losses in crop yield or grazing value from removing the land from productive use. The option should stipulate a minimum buffer width of 10m to deliver positive impacts for the natural environment. Amongst the multiple benefits of this proposal is the fact that it would make a major contribution to securing the environmental benefits of beavers across Scotland.

Support for the better integration of trees and woodland in farm management through agroforestry is a priority for nature in farmed landscapes. This support should include access to a high quality farm advisory service to help farmers to plan moves into different forms of agro-forestry well.

2 - Forests Delivering for Scotland's Climate Change Plan

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?

Please explain your answer in the text box.:

The climate emergency must be viewed in tandem with the nature emergency, as recognised at COP26. We need to restore ecosystems at landscape-scale (a core concept in rewilding) in order to restore the natural carbon cycle. The FGS should therefore place heavy emphasis on improving the ecological health of our existing woodlands and expansion of new native woodlands to generate greater carbon storage and sources of biodiversity for the future. Our answers under questions 15 and 16 are particularly relevant to the essential natural regeneration and deer management elements of meeting this imperative.

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,

Yes

Please explain your answer in the text box.:

Yes, if the flexibility is used to support the channelling of natural capital towards woodland projects that will support nature and communities. We recommend that the FGS considers establishing a cross-compliance relationship with the Woodland Carbon Code. FGS applicants should declare whether they intend to develop a WCC product from the project in question and whether and how the project will benefit nature and communities (e.g. through meaningful habitat enhancement, provision of amenity or other means). Projects seeking to access both FGS and WCC income that fail to demonstrate these wider needs, should not be supported with grant.

Additionally, the Government should put The Interim Principles for Responsible Investment in Natural Capital on a statutory footing. This would assist in achieving a Just Transition by actively involving communities in the major changes required in land use to meet our climate and environmental commitments.

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?

Please explain your answer in the text box.:

A much higher proportion of woodland expansion and management needs to be achieved via natural regeneration to improve the resilience, biodiversity and carbon storage in our landscapes. The FGS can do much to support this by favouring natural regeneration in its funding balance (see Q15) and supporting the reduction of herbivore pressure on trees and woodlands. It must also make natural regeneration an easier option for grant applicants to take by lowering the bar for grant conditions compliance. We therefore recommend that the success of natural colonisation in becoming established is assessed at year 15 and with a view to whether trees have become ecologically established, as opposed to simply reaching a minimum height. This would increase the confidence of potential applicants in selecting this option.

Given the importance of restoring the condition of our existing and too-often depleted woodland carbon and biodiversity stores, we recommend that landholdings with ancient woodlands must demonstrate that these woodlands are in positive management for nature before additional woodland expansion is supported. Depending on the detail of the pending legislation, this could work through the land management plans proposed under the Land Reform Bill Consultation.

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

How can the grant scheme support this?:

It goes without saying that we want publicly supported woodland expansion to be resilient to climate change, pests and diseases. The FGS could encourage and stimulate proposals that go above basic UKFS requirements to boost their resilience. We propose that a 'resilience supplement' is included within all options for woodland expansion and management to incentivise greater species diversity than the draft UKFS suggestion of setting a maximum for any single species at 65%. For example, this supplement could be offered for schemes that propose less than 50% of any single species in the mix, a maximum size or proportion of a single species block and a minimum number of species included overall.

3 - Integrating Woodlands on Farms and Crofts

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, Knowing where to get reliable advice, Clearer guidance on grant options, Flexibility within options, Intervention level, Support with cashflow, Information on how current land use could continue with trees integrated throughout

Are there others not listed above?:

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

Please explain your answer in the text box.:

A modest 'planning grant' for small schemes (say 0.25-5ha) would help to overcome the costs barrier. However, it may be more empowering and cost effective if individuals could make their own applications through a user-focused, simplified process. This could include a one form, one guidance-document application, a reduced burden of supporting evidence and access to low-cost mapping. Such a process should be assessed for usability by a suitable third party.

We also recommend that applying to the scheme is simplified, at least for farmers and crofters by ending the need to submit separate applications for woodland creation and woodland improvement options. In addition, planting mixed woodland involves more bureaucracy than planting monoculture. This needs to be addressed to promote more resilient and biodiversity-rich woodland.

Any measures that reduce herbivore impacts on woodlands will help to support the management of small woodlands, so Q16 is also directly relevant

here.

4 - Forests Delivering for People and Communities

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

Please explain your answer in the text box.:

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

Please explain your answer in the text box.:

We would like to see the return of support for community-led projects and wider community involvement in forest management. Communities can provide a route to public benefits and most obviously to community wealth building if their good ideas are supported.

Employment in forestry and productive woodlands is an important how timber and non-timber forest products can contribute to community wealth building. This takes in both woodland management and the ways forest materials can be processed and used by small businesses capable of producing high value products that retain much more of the value in a supply chain in local areas, as opposed to losing much of that to centralised commercial supply systems operating at industrial scales. Stronger funding for alternative, non-commercial silviculture, small-scale harvesting and small business processing will all contribute to community wealth building.

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?

Please explain your answer in the text box.:

Recent research (such as this report) has shown that Community engagement in large commercial forestry schemes has been below standard in too many cases. This should be addressed in the FGS Review by:

- Requiring proposals to meet community engagement standards. This report could provide a strong starting point for developing these standards;
- Information on schemes, including all supporting data should be readily accessible online, as per the planning system, via a user-friendly website;
- Grant assessments for woodland creation should take into account the cumulative impact of schemes according to clear, published criteria.

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?

Please explain your answer in the text box.:

- Continue to publish regularly updated statistics on the FGS;
- Information on schemes, including all supporting data should be readily accessible online, as per the planning system, via a user-friendly website;
- Criteria for grant assessment should be published and this should include the development of clear criteria for assessing the cumulative impact of forestry schemes.

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

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

Alternative silviculture models, particularly continuous cover forestry, can be applied to create more opportunities for smaller businesses using low volumes of timber to create higher value products with a greater prospect of retaining revenue in local economies. While access to training in these silvicultural techniques is an essential part of increasing the proportion of this forestry model, so is purchasing the equipment needed to process timber and craft saleable, high value products from the material. Maintaining, and looking to optimise or increase such support is key to efforts to move more of our forestry into this more sustainable and impactful approach.

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

Link apprenticeships to the smaller businesses expanding the use of these techniques and support the businesses to manage the apprentices' training. This would support skills development and business growth alike.

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

Please explain your answer in the text box.:

Consider whether such support should be blended with support from Scottish Enterprise and HIE.

5 - Forests Delivering for Biodiversity and the Environment

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?

Please explain your answer in the text box.:

Grant support should explicitly favour proposals that will provide the greatest benefits for climate change, nature and communities and which generate little or no financial income. This could operate in three parts:

1. Nature benefit/commercial value - with the highest payments for montane woodlands and decreasing through a sliding scale from high payments for native woodlands, through native and mixed woodlands that will provide blends of biodiversity, amenity and financial value, down to the lowest payments for non-native commercial woodland planted in suitable locations.
2. Establishment method - new native woodland established by natural colonisation should receive higher payments than planted woodlands.
3. Strategic location – offer a supplement for natural colonisation which aims to expand from ancient woodland and greater support for creating riparian woodlands in farmed landscapes.

Invasive non-native species, especially *Rhododendron ponticum* and Sitka spruce seeding out from commercial plantations, are significantly reducing biodiversity, including in key habitats such as Caledonian pinewoods and Scotland's Rainforest sites. The FGS needs to continue to support the control of INNS but adjust approach to fund long-term, landscape-scale approaches supported by competent strategic planning. The last two decades of FGS experience of this issue have proved that tackling INNS without these attributes in place is a waste of money.

In the case of Sitka spruce and other invasive non-native conifers such as Western hemlock, the current WIG option to clear this should continue, but for long-term resilience and cost saving purposes, meaningful buffer zones of up to 500m should be specified to avoid Sitka seeding into native woodland and other habitats. Invasive Sitka should ideally be removed whilst still young to minimise damage to native habitat.

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?:

Effective deer management must be competently planned. FGS applicants should therefore include a Herbivore Management Plan which deals with deer, but also any other herbivores in the landscape, including livestock. These plans should consider the practicalities of implementing deer and livestock management in order to deliver and maintain herbivore impact levels over the long term that will achieve the nature restoration goals set for each grant-supported project.

Plans need to describe how applicants will work with relevant neighbours to reduce deer numbers at landscape scale and be regularly reviewed so that they adapt to changing information on herbivore impact levels and distributions.

Grants for deer fencing should be used judiciously, in a supporting role to landscape-scale deer management. Payments for fencing to support woodland creation should remain available to play a supporting role as we transition to a landscape with significantly lower browsing pressure from deer. Fencing is not a sustainable solution to habitat restoration but can be an appropriate tool if applied judiciously. With this in mind, grant payments for deer fencing should only be available to support woodland creation or management in specific circumstances:

- Protecting small remnants of native woodland where priority for restoration is denoted by:
 - o designation as a SSSI or SAC;
 - o inclusion on the Caledonian Pinewood Inventory or the Ancient Woodland Inventory;
 - o native montane woodlands.
- Repairs to existing fences protecting any of the above categories of woodland should be funded where extending the lifespan of the fence has a realistic prospect of completing previous progress made towards woodland establishment.
- Where there is a clear section in the Herbivore Management Plan describing how the fence will be monitored and maintained over its lifespan and a clear plan for how the biodiversity value of the new woodland will be maintained after that lifespan.

Small scale mixed land use?:

Financial support for smaller-scale collaboration between land managers so that deer populations can be managed in a coordinated manner. This should be supplemented with support for technology to inform more effective deer management, such as drone surveys and thermal imaging.

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

Please add your comments here.:

Scottish Forestry must be adequately staffed and resourced to administer the scheme, monitor its outputs, require compliance with conditions where needed to ensure value for money and learn from experience in producing good quality outcomes.

About you

What is your name?

Name:
Trees for Life

What is your email address?

Email:
alanm@treesforlife.org.uk

Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:
Trees for Life

Scottish Forestry would like your permission to publish your response. Please indicate your publishing preference:

Publish response with name

We may share your response internally with other Scottish Forestry 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 Forestry to contact you again in relation to this consultation exercise?

Yes

I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

I consent