

Submitted to Future Grant Support for Forestry
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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?

Not sure

Please explain your answer in the text box.:

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

Not sure

Please explain your answer in the text box.:

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 FGS must make explicit the inextricable link between the climate emergency, net zero targets, ecosystem resilience and biodiversity. It is not possible to tackle any single one in isolation, and the FGS must reflect this by providing support and regulations to ensure long-term biodiversity outcomes in woodlands and non-woodland habitats are secured alongside climate, net zero and commercial forestry outcomes.

There are several key ways in which the FGS must evolve to this end:

- Provide more support to protect and restore existing woodland.
- A shift to more conditional funding with respect to woodlands being managed to meet net zero, climate, and biodiversity targets, in line with the goals of the Scottish Biodiversity Strategy (SBS)¹.
- Support the protection, management, and creation of non-woodland sites, (especially, but not limited to, grasslands and peatlands) that make a significant contribution to climate change and biodiversity outcomes.
- Show greater recognition and support for the role of soil in carbon sequestration.
- Display an equal focus on biodiversity and climate outcomes in woodlands, given the inextricable link between the two.

Delivering an improved support package in each of these key areas will necessitate a greater emphasis on 'payment to manage' in the FGS support package.

BETTER MANAGEMENT

The first aim of the FGS should be to protect and restore existing woodland. Much of Scotland's ancient woodlands are in ongoing decline, including Scotland's rainforests, Caledonian Pinewood Inventory (CPI) sites, mountain woodlands, and plantations on ancient woodland sites (PAWS), all sites that are of particular importance for both biodiversity and climate change outcomes.

FGS funding should be more proportionate with regards to the amount of support available to protecting and restoring existing woodlands. The funding packages available from the FGS should be re-calibrated to reflect the importance of woodland management. At present, a disproportionate amount of FGS support is allocated to woodland creation (£232m out of £274m of approved grant assistance since the start of the current FGS). This is a perverse situation when existing Scottish woodland is not being managed, even in cases where proposed new woodlands would be under the same ownership as existing woodland.

Grant support for projects should be conditional upon the management of woodlands to be resilient to climate change, and to provide positive biodiversity outcomes, in line with the SBS's move to more conditional funding. This would ensure woodland management is secured alongside woodland expansion where the woodland is on the same landholding. This can be identified through the land management plans proposed under the Land Reform Bill Consultation. This is especially the case where landholdings have native woodlands, ancient woodlands, CPIs, or PAWS: landowners must demonstrate that these woodlands are in positive management before additional woodland creation support is given to them by the FGS.

Examples of positive woodland management for biodiversity and climate targets include, but are not limited to, the following:

- Low impact silviculture systems.

- Continuous cover silviculture systems.
- Management techniques that minimise soil disturbance.
- Increasing structural and age diversity within woodlands.
- More sustainable deer (and other grazer) management.

More details on the above suggestions can be found in the answers to questions 3 and 15.

CONDITIONAL FUNDING

The FGS should ensure close alignment with the SBS so that the forestry industry in Scotland contributes towards the statutory nature restoration targets, including working together to develop policy and investment frameworks for restoring Scotland's Atlantic Rainforests and other species-rich woodland habitats.

To align with the SBS and contribute towards statutory nature restoration targets, the FGS should shift more funding to being conditional upon positive environmental outcomes, in line with the SBS goal to see this happen for agricultural support payments.

Furthermore, FGS support should only be considered after Environmental Impact Assessments have been completed, wherever the impact of afforestation or felling are likely to be significant, in line with UKFS guidelines².

All future investment proposals, both public and private, should be assessed against the Scottish Government's Interim Principles for Responsible Investment in Natural Capital, and all existing schemes created under FGS so far should be re-assessed to ensure they are meeting the same principles.

Protecting, managing, and creating non-woodland sites

Tackling climate change and biodiversity loss in Scotland cannot be achieved through afforestation and woodland management alone. The FGS must recognise that woodlands are part of a wider landscape and that other habitats in this landscape not only make vital contributions to climate and biodiversity outcomes themselves, but that the ecosystem services and resilience of woodlands are enhanced by being part of a well-managed wider ecosystem.

To prevent the afforestation of important non-woodland sites, the FGS should work with other environmental schemes to make funds available for the protection, restoration, management, connection, or creation of a wide variety of habitat types, in woodlands and in their wider landscape. This must include assessing which non-woodland sites are unsuitable for afforestation due to their existing contributions towards climate and biodiversity targets. By working together, it is possible to assess which scheme is best placed to provide support to these habitats, removing potential conflict between scheme objectives such as afforestation of butterfly-rich grassland sites.

We believe that FGS should create partnership initiatives with other environmental organisations or biodiversity stakeholders, especially those that represent the interests of peatlands and grasslands, to ensure better representation in forestry matters for other habitats that can contribute to biodiversity outcomes and carbon sequestration. For example, grants from the Forestry Cooperation section of the FGS could be provided to hire consultants or ecologists to advise on integrating woodland creation and/or management on a landscape scale, with particular reference to protecting peatlands and grasslands.

The FGS offers many support packages aimed at afforestation. However, support must also be available to ensure landowners who have high value non-woodland sites do not come under financial pressure to sell/develop this land for afforestation. Closer alignment with other environmental schemes, as outlined above, will help direct applicants to appropriate funding to this end.

RECOGNISING THE ROLE OF SOIL IN CARBON SEQUESTRATION

The FGS should recognise the significant role that soil plays in carbon sequestration, in both woodland and non-woodland habitats. Minimising soil disturbance maximises its carbon sequestration abilities and reduces the amount of carbon released from soil – this should therefore be a priority for the FGS, reflected in the support offered. This support should include, but not be limited to, the following:

- The grant rate for low impact silviculture systems (LISS) should be increased.
- Place greater emphasis on natural regeneration with regards to woodland expansion and connectivity (see above and answers to questions 5 and 15).
- Oppose the afforestation of sites with high amounts of carbon stored in the soil (such as peatland³ and undisturbed organic grassland), and work with other environmental schemes to ease the financial pressure on landowners to afforest such land, where necessary.
- Go beyond the UKFS 'specific presumption' against the conversion of peat bogs – explicitly state in FGS guidance that peatbogs must not be converted, nor must any work be carried out that would disturb peatbog soils, or have any negative impact on peatbogs or the ecosystem services they provide. Ensure stringent checks in place (see 'Conditional funding' under question 3; 'Woodlands and the wider landscape' under question 15) to ensure no FGS support is given to any scheme that may breach this guidance. Additionally, extend this ban on conversion to any sites where the hydrology of adjacent peatbogs or wetland sites would be compromised.
- Provide guidance and financial support for landowners to pursue cultivation systems (e.g. continuous cover silviculture systems) that will help preserve soil carbon stocks.
- Ensure the removal of forest products from sites, including non-timber products, does not, by disturbing soil, deplete soil stored carbon over the long term and maintains the site potential for carbon sequestration.
- Offer technical and financial support to assess soil carbon at woodland sites and sites earmarked for afforestation. Assess the impact that different management regimes may have on soil, and therefore carbon sequestration/release, at these sites. If necessary, the management practices at these sites may have to be amended in order to reduce the impact on the soil. To this end, introduce more low-impact felling and extraction options to minimise soil and habitat disturbance, through FGS grants and guidance.

- Require forest managers or landowners to assess the potential impacts of soil disturbance when planning operations involving cultivation, harvesting, drainage and/or the construction of accessways, providing support to do so if needed.

REFERENCES

1. Scottish Government (2022). Scottish Biodiversity Strategy to 2045. [scottish-biodiversity-strategy-2045-tackling-nature-emergency-scotland.pdf](https://www.gov.scot/scottish-biodiversity-strategy-2045-tackling-nature-emergency-scotland.pdf) (www.gov.scot)
2. Forestry Commission (2017). The UK Forestry Standard. The UK Forestry Standard (publishing.service.gov.uk)
3. Nature Friendly Farming Network (2022). Farming for Climate Action. NFFN-Farming-For-Climate-Action-Report_Digital.pdf
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.:

Only where this support also produces positive biodiversity outcomes and does not result in the afforestation of existing habitats that are already delivering carbon sequestration and/or biodiversity benefits, especially grasslands and peatlands³.

In line with our answer to question 15, under the 'Woodlands and the wider landscape – supporting non-woodland sites' section, biodiversity and carbon sequestration outcomes should be the primary drivers behind any decision supported by the FGS, not financial gain.

We believe that there is a significant opportunity for the FGS to combine government and private financing to promote more ecologically coherent woodlands. Currently, small-scale planting efforts are not large enough for private finance to be practicable. Scaling up projects will require the use of existing government frameworks provided by the Land Use Partnerships/Frameworks and opportunity mapping developed for the Nature Networks that NPF4 mandates Planning Authorities to create. Doing so would provide both the scale and coordination required to tackle the climate and nature emergencies.

The Government should put The Interim Principles for Responsible Investment in Natural Capital on a statutory footing. Doing so would help to achieve a Just Transition by actively involving communities in the major land use changes required to meet Scotland's environmental commitments. To quote the LINK response:

"From our experience in policy planning, we have learned that developers and investors rarely adhere to "should", such as "Investment and management decisions "should" demonstrate consideration of positive and negative impacts across all four capitals." If new legislation is required, the Government must act quickly to enact it. As many have warned, we must take prompt action to prevent a possible "wild west" for new private finance schemes."

REFERENCES

3. Nature Friendly Farming Network (2022). Farming for Climate Action. NFFN-Farming-For-Climate-Action-Report_Digital.pdf
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.:

To ensure woodland expansion and management are more sustainable and produce better outcomes for biodiversity and climate targets the current funding package could be improved in two main ways:

- The funding package should reflect the 'protect-restore-connect-create' hierarchy of conservation importance;
- All funding should be conditional upon positive management of new and/or existing woodland, in line with the Scottish Biodiversity Strategy's (SBS) shift to more conditional funding packages¹. These improvements would result in more funding being available as 'payment to manage' grants.

Any change to the current funding package to stimulate woodland expansion and better management must not be implemented in a way that impinges on existing high value non-woodland habitats, or the potential creation of these habitats at suitable sites. Furthermore, the financial incentives on offer from the FGS should not place financial pressure on landowners with these habitats/sites to give them up for afforestation. There must be better integration of the FGS alongside other environmental schemes to ensure the best outcomes for these habitats, for biodiversity and the climate, and the most suitable financial support for landowners with woodland and non-woodland habitat alike.

BETTER MANAGEMENT

The first aim of the FGS should be to protect and restore existing woodland. Much of Scotland's ancient woodlands are in ongoing decline, including Scotland's rainforests, Caledonian Pinewood Inventory (CPI) sites, mountain woodlands, and plantations on ancient woodland sites (PAWS), all sites that are of particular importance for both biodiversity and climate change outcomes.

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FGS support is allocated to woodland creation (£232m out of £274m of approved grant assistance since the start of the current FGS). This is a perverse situation when existing Scottish woodland is not being managed, even in cases where proposed new woodlands would be under the same ownership as existing woodland.

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Examples of positive woodland management for biodiversity and climate targets include, but are not limited to, the following:

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- More sustainable deer (and other grazer) management.

More details on the above suggestions can be found in the answers to questions 3 and 15.

WOODLAND EXPANSION

Wherever possible, natural regeneration should be the preferred method of woodland expansion. Natural regeneration can be more cost effective than alternatives, providing the opportunity to greatly increase woodland expansion. Compared to planting, natural regeneration often leads to more resilient woodlands with better outcomes for biodiversity⁴.

The current support package for natural regeneration could be improved by increasing the assessment period for natural colonisation from 5 to 15 years, giving participants a more realistic period of time to achieve the necessary number of trees per hectare. The current assessment period of 5 years is insufficient, potentially discouraging potential applicants.

Expansion should be targeted at native woodland expansion, especially that which buffers ancient woodland and/or links up native woodland fragments. To facilitate this the hectare grant rate for natural regeneration should be increased, and a new FGS/agri-environmental option for aiding natural regeneration beyond the edge of existing natural woodland should be introduced. These changes need to be made whilst ensuring it does not create incentives that would result in the afforestation of existing high value non-woodland sites.

Increase the minimum acceptable percentage of native broadleaves and reflect for the Woodland Creation Conifer and Diverse Conifer options. Ensure these species are planted at appropriate sites, reflecting the ecology of each area.

More grants should be available to link existing native woodland fragments, either through managing existing habitat corridors or creating new ones (as stated above), on the condition that new corridors don't impact existing high value habitats. Landowners should also be required to justify their choice when proposing to plant new native woodland that would be detached from existing woodland whilst not proposing to expand the existing woodland.

REFERENCES

4. Woodland Trust. Natural Regeneration. Natural Regeneration: Expanding Tree Cover - Woodland Trust

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?

Not sure

How can the grant scheme support this?:

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?:

We support all of the above measures. We want to place particular emphasis on ensuring that farmers and crofters have access to guidance and other support to ensure they avoid afforesting open habitats of high biodiversity and carbon sequestration value, such as peatlands and species-rich grasslands. We agree with the LINK response to this question, quoted here:

"In the case of agroforestry, resources should be developed to inform farmers on how such systems enable food production as opposed to "sacrificing" farmland to trees. In general, 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. Small farm-scale woodland creation should sit within Tier 4 and be managed by Scottish Forestry. The area threshold to qualify for this support should be decided in discussion with farming and environmental interests. We recommend that this discussion considers the pros and cons of setting the minimum area for this support at different levels between 0.25 and 1 hectare.”

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.:

The FGS application process is onerous for small schemes, with the majority of individuals unable to apply with the help of a professional forestry agent, the fees for which are disproportionately high given that the preparation for small scheme proposals requires a similar level of input as those for large schemes. We propose the introduction of a planning grant for small schemes (for example 0.25-5ha) to help overcome this barrier.

Individuals submitting small scheme applications could also be empowered to do so themselves through a simplification of the application process, by moving to one form, reducing the amount of supporting evidence, and providing access to low-cost mapping. Furthermore, the application process should be amended to eliminate the additional bureaucracy that currently burdens mixed woodland application compared to monoculture applications, which would also help promote the creation of more biodiverse woodlands.

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.:

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.:

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.:

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?

Not Answered

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

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

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.:

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.:

There are several key ways in which the FGS grant support can evolve to produce better biodiversity outcomes in Scotland’s woodlands and beyond, similar to the key themes outlined at the top of our answer to question 3. These key themes are outlined and expanded below. We have also detailed some specific areas the FGS should focus on to improve biodiversity outcomes.

The key themes are:

- FGS funding priorities should follow the ‘protect, restore, connect, create’ conservation hierarchy. Consequently, a greater proportion of grant support should be available for the management of woodlands (payment to manage).

- All FGS funding should be conditional upon the positive management of sites, in line with the SBS's shift to more conditional funding¹.
- Grant support aimed at woodland expansion should be weighted heavily towards native woodland expansion and woodland regeneration.
- The FGS should do more to support the protection, management, and creation of non-woodland habitats that make significant contributions to biodiversity and climate outcomes.

PROTECT AND RESTORE EXISTING WOODLANDS

The funding packages available from the FGS should better reflect the 'protect, restore, connect, create' conservation hierarchy. The first aim of the FGS should be to protect and restore existing woodland. Much of Scotland's ancient woodlands are in ongoing decline, including Scotland's rainforests, Caledonian Pinewood Inventory (CPI) sites, mountain woodlands, and plantations on ancient woodland sites (PAWS), all sites that are of particular importance for both biodiversity and climate change outcomes.

Addressing this issue requires woodlands to be better managed, which requires forest managers to have more financial support available to them for management. Currently a disproportionate amount of FGS support is allocated to woodland creation (£232m out of £274m of approved grant assistance since the start of the current FGS). This is a perverse situation when existing Scottish woodland is not being managed, even in cases where proposed new woodlands would be under the same ownership as existing woodland. FGS funding should be more proportionate with regards to the amount of support available to protecting and restoring existing woodlands.

In addition to protecting existing woodlands, the FGS should support the protection of other trees as well, particularly those in hedgerows. Whilst this may fall outside the remit of the FGS, the administration of the FGS should ensure better communication and integration between themselves and other environmental schemes, to ensure landowners are directed to the relevant schemes, such as the AECS, to access support.

FUNDING CONDITIONAL UPON POSITIVE MANAGEMENT

It is not enough for grant support to be available for management: positive management should be secured by making it a requirement for receiving FGS support, reflecting the importance of positively managed woodlands to meeting climate and biodiversity outcomes.

In line with the SBS goal for more agricultural funding to become conditional upon meeting biodiversity outcomes, and the proposed "essential standards" required for base level payments under the new Agriculture Bill, the FGS should adopt more conditional funding for its grant support. Grant support for woodland creation or management should be conditional upon the proposed changes meeting essential standards over climate and biodiversity outcomes, and any landholdings with existing woodland must demonstrate that this woodland is in positive management before additional woodland creation support is granted.

The FGS grant packages should be designed so that woodland management is secured alongside woodland expansion where the woodland is on the same landholding. This can be identified through the land management plans proposed under the Land Reform Bill Consultation. Landholdings with all-native woodlands, ancient woodlands, CPIs, or PAWS must demonstrate that these woodlands are in positive management before additional woodland creation support is given to them by the FGS.

WOODLAND EXPANSION AND REGENERATION

Wherever possible, natural regeneration should be the preferred method of woodland expansion. Natural regeneration can be more cost effective than alternatives, ultimately providing the opportunity for further expansion. Compared to planting, natural regeneration often leads to more resilient woodlands with better outcomes for biodiversity⁴.

The current support package for natural regeneration could be improved increasing the assessment period for natural colonisation from 5 to 15 years, giving participants sufficient time to achieve the necessary number of trees per hectare. The current assessment period of 5 years is insufficient, potentially discouraging would-be applicants.

Wherever possible, expansion should be targeted at native woodland expansion, especially that which buffers ancient woodland and/or links up native woodland fragments. The hectare grant rate for natural regeneration should be increased to this end.

The FGS should increase the minimum acceptable percentage of native broadleaves for the Woodland Creation Conifer and Diverse Conifer options. Ensure these species are planted at appropriate sites, reflecting the ecology of each area.

More grant support should be available to link existing native woodland fragments, either through managing existing habitat corridors or creating new ones, on the condition that new corridors don't impact existing high value habitats. Landowners should also be required to justify their choice when proposing to plant new native woodland that would be detached from existing woodland whilst not proposing to expand the existing woodland.

Woodland expansion or management should only be supported after assessments have been made regarding the use of the site by priority species and whether proposed changes would impact these species. For example, unimproved grassland sites are used by the Northern Brown Argus moth (*Aricia artaxerxes*)⁵ – these sites would be threatened by woodland expansion. These assessments must be implemented stringently. Medium and large creation schemes should only be supported if developers can evidence engagement with relevant biodiversity stakeholders (such as Local Environmental Record Centres/LERCs).

WOODLANDS AND THE WIDER LANDSCAPE - SUPPORTING NON-WOODLAND SITES

Halting and reversing biodiversity loss in Scotland cannot be achieved through afforestation and woodland management alone. The FGS must recognise that woodlands are part of a wider landscape and that other habitats in this landscape not only make vital contributions to biodiversity and climate outcomes themselves, but that the ecosystem services and resilience of woodlands are enhanced by being part of a well-managed wider ecosystem. To this end, the FGS should do more to support the wider ecosystem, including:

- Banning the afforestation of high value non-woodland habitats, or afforestation of adjacent areas that would damage these habitats. Peatlands and species-rich grasslands must be included in this ban.
- Work with other environmental schemes to find the best outcomes for biodiversity, including the provision and allocation of funds for work on non-woodland sites.
- Ensure any financial incentives offered by the FGS for potential afforestation do not place insurmountable financial pressure on landowners to afforest areas of high quality non-woodland habitat, by working with other environmental schemes to direct financial support to these landowners to protect and enhance these existing habitats.
- The FGS should do more to assess potential afforestation sites for existing high quality habitats and/or species of concern. A targeted habitat survey should be required for any potential afforestation sites where semi-natural vegetation is present, with the FGS covering applicants' costs for this. These surveys must identify whether key habitats for priority species are present e.g. rockrose for Northern Brown Argus, or scabious for Marsh Fritillary. Some of these key habitats for priority species, especially those in species-rich grasslands, are small and therefore likely to be absent in habitat mapping datasets. Consequently, ecological surveys should be carried out at appropriate times of year to capture these sites – consultation with relevant biodiversity stakeholders (e.g. LERCs) should always be sought to ensure these checks are implemented stringently.
- Similarly, FGS grant support should be made available for species surveys when required – e.g. when the need is identified by relevant environmental NGOs. Following on from the point immediately above, consultation with relevant stakeholders will help identify this need.
- The FGS should make available a grant for the cost of non-native conifer removal for the restoration of all native woodlands and open habitats (including peatlands, species-rich grasslands, species-rich heathlands, and sand dunes). FGS support for afforestation applications should be made conditional on use of this grant when previous afforestation and management has already led to loss and/or damage to priority habitats.

STRUCTURAL AND AGE DIVERSITY

Higher structural and age diversities in woodlands are positively correlated with biodiversity in woodlands⁶, including lepidopteran abundance and species richness⁷. Regulations and funding should be included in the FGS to require and assist forest managers and landowners to create greater structural diversity within their woodlands.

Natural regeneration is one way to promote this diversity, as outlined in the “Woodland expansion” section to this question. Greater structural and age diversity should also be promoted through phased felling and restocking, and the selective removal of trees for the benefit of priority species such as the Northern Brown Argus, as well as the resilience benefits greater structural diversity can bring⁸. Consulting with relevant biodiversity stakeholders (e.g. Butterfly Conservation) can help identify opportunities for more targeted management aimed at specific age classes. For example, young birch trees benefit Kentish Glory (*Endromis versicolora*), or aspen suckers for Dark Bordered Beauty (*Epione vespertaria*).

OPEN SPACES

The FGS should support landowners to create and protect networks of open spaces in woodlands, in line with UKFS guidelines. Open spaces are vital to the presence of many lepidopteran species in woodlands.

The FGS should tighten regulations around woodland clearings, which are important habitats for some Scottish Biodiversity List species (e.g. Northern Brown Argus⁵; Pearl-bordered Fritillary (*Boloria euphrosyne*)⁹; Dingy Skipper (*Erynnis tages*)¹⁰), to prevent developments which may negatively impact species using these spaces, such as creating tracks through the clearings, as well as promoting the removal of unwanted non-native tree growth within woodlands and on adjacent land to maintain clearings.

WOODLAND EDGES

Edge habitats are important for a wide variety of species, including many on the Scottish Biodiversity List of priority species, such as the Chequered Skipper (*Carterocephalus palaemon*)¹¹. Edges should be extended to not only offer more habitat for those species that use it, but also to diminish edge effects in the woodlands themselves.

Grant support and/or access to technical support should be made available to forest managers to improve edges around existing woodland, through regeneration or planting schemes, and better management of existing habitat immediately outside their woodlands.

A plan to create and manage edge habitats should be a requirement for woodland creation grant support applications.

DEER IMPACTS

We support the reduction of deer impacts in woodlands, especially as this would help enable natural regeneration on a greater scale.

The FGS should support forest managers to collect useful information to help manage deer and other grazer impacts. Density is an important metric, but impact levels are more important – these can be assessed using NatureScot and Woodland Herbivore Impact Assessment methods.

FGS applicants should be required to submit a herbivore management plan outlining known deer species, densities, and issues on their land and

neighbouring land, including data on impact levels. These plans should consider the practicalities of implementing deer and other grazer management to maintain grazing impact levels over the long-term that will achieve the nature restoration goals set for each grant-supported project.

Herbivore management plans should also include:

- Details of basic deer management infrastructure to support future culling operations such as access tracks to all corners, open deer glades or culling areas.
- A description of how applicants will work with relevant neighbours to reduce deer numbers at landscape scale.
- An awareness that deer densities of 0-5 deer/km² are likely to be necessary to allow woodland habitats to sustainably expand and support biodiversity.
- Consideration of how browsing pressure from livestock in the landscape will be addressed alongside deer pressure.
- A commitment to five yearly reviews in the light of Herbivore Impact Assessment and other data.
- Compliance with the Code of Sustainable Deer Management.

We recommend that these criteria be reviewed with deer management, forestry and conservation organisations to best encourage effective working between different landholdings in a given landscape to achieve objectives for woodland condition and expansion through natural regeneration. Regional Land Use Partnerships and Nature Network plans may have an important role to play in setting such objectives.

We believe these management plans, as a means to reduce grazing pressure on a landscape scale, are a more sustainable solution than fencing. However, payments for fencing to support woodland creation should remain available during the transition to a landscape with reduced grazing pressure. We therefore support the continuation of grant availability for fencing from the FGS under these 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.
- Fences to facilitate landscape-scale deer management, where the value of this is outlined to, and endorsed by, NatureScot.
- We recommend that consideration is given to assessing the role that offset electric wires in front of stock fences could play in some situations and that this is eligible for grant support where suitable.

In the more limited circumstances where deer fencing is used, the accompanying Deer Management Plan should include a section 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 the end of that lifespan.

OTHER INVASIVE SPECIES

The FGS should work with communities and other environmental schemes to develop strategic landscape management plans to control invasive species, and grants need to be available for operations beyond woodland edges. For example, eradicate *Rhododendron ponticum* by operating at the landscape scale, particularly in areas surrounding Scottish rainforests, reducing the chance of reinvasion by tackling the whole *R. ponticum* population within a catchment area.

The future grant needs to recognise that *Rhododendron ponticum* eradication needs to be done in phases over a long time period. 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 at year three after the initial clearance.

Grants need to be supported by a strategy for Scotland, or at least the rainforest zone-scale with the following elements: direction on rhododendron management from 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 it achieves better outcomes.

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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?:

Small scale mixed land use?:

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

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Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:

Butterfly Conservation

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

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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?

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