

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?

Yes

Please explain your answer in the text box.:

An important caveat to our support is that afforestation creates significant water use. As well as community health and wellbeing arising from woodland, there is also a public interest in water that should be taken into account. Support for trees of the right kind in the right place should be conditional on formal consideration of impact on freshwater habitats, e.g. through the River Basin Management Planning process.

A particular concern is rural land being converted from farming to forestry, mainly driven by what we see as false market signals that result in the value of land being driven up by generation of "carbon credits". Following purchase of farmland by third parties for such purposes, forestry should not be grant-aided.

SANA has been careful not to criticise true farm forestry and has lauded the possibilities for riparian tree planting as a means of mitigating effects of climate change.

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.:

SANA has no locus from which to comment on the particular details of how farmers might have improved incentives for tree planting. However, as noted above, we approve in principle if shown to be consistent with River Basin Management Plan priorities.

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.:

It is interesting that this section of the consultation identifies "drought" as a climate resilience threat. This appears to be the only recognition in the text that freshwater and freshwater habitats deserve consideration as part of "natural capital".

Previously, we have advocated that "nature restoration" should have priority in non-competitive support for farmers. We would like to see the range of eligible subjects extended to include projects and management actions that contribute to water conservation and to the wider water habitat – such as well-planned riparian woodland.

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,

No

Please explain your answer in the text box.:

A particular concern is the amount of land which might be taken out of agricultural production and planted with trees, in large part influenced by a relatively new income stream, carbon credits. The net effect could be a substantial loss of water volume to water bodies in Scotland. However, SANA is very much in favour of well-defined new planting as a positive contribution to water quality (buffering) and water temperature (shading).

It is important to the freshwater environment in Scotland that much of the land should remain in agricultural use. True farm forestry and the positive possibilities for riparian tree planting are means of mitigating effects of climate change. Wholesale expansion of forestry is not.

Rural land use is a complicated subject because of the diverse land uses which can impact on water bodies and how they relate to each other. Having a planning preference for how a site should be used excludes other possible uses.

A current issue, which is driven by the climate change agenda, is the search for opportunities to generate carbon credits by overseas corporate bodies through acquisition of farm land in Scotland for planting with trees. It is recognised that there is widespread foreign demand for sites to plant trees on Scottish soil. This is to offset carbon emissions produced overseas. Countries and/or companies have targets to meet and land for tree planting can be

scarcer elsewhere*. Also, within the UK there is official advocacy of growing trees for the purposes of selling carbon credits. See: <https://www.gov.uk/guidance/the-woodland-carbon-code-scheme-for-buyers-and-landowners>

More generally, SANA is concerned that insufficient attention is paid to disbenefits of afforestation, e.g. consumption of water by trees, acting as a vector for acidification of watercourses, contributing to flood events and badly configured drainage leading to deposition of silt in watercourses.

On specifically climate grounds, an issue of good practice should be the design of forests. For instance, an objective of forest design can be to moderate water temperature through shading. However, shading is only good practice for some fish species. Also, there should be a clear distinction between conifers and deciduous trees, with a preference for the latter on or near watercourses. While dense planting of commercial conifer forests is the major concern, dense planting of deciduous forests may cut out most of the light too, other than during winter. In short, forest design, with respect to water, should be integrated with local fishery management objectives.

In general, deciduous woodlands protect water quality, limit bank erosion and bed erosion and minimise siltation problems, not just beneath the tree canopies, but also in the water courses downstream. Densely planted conifers let in so little light that almost all ground cover plants, themselves potentially soil-binding, are absent. Streams in commercial forestry areas tend to be more acidic, sometimes acutely so, also they are flashy in flows and prone to dry up. While these problems are widely understood and accepted, and mitigation measures are available, will these be applied sufficiently to preserve natural riparian and water channel biodiversity? High standards of forest/woodland design and subsequent implementation on the ground are fundamental to mitigation measures. Therefore, there needs to be strict enforcement and substantial penalties for non-compliance. Deterrents against bad practice are needed. Otherwise, grants for climate mitigation measures could result in frantic tree planting - a numbers game without sensible controls.

* "We consider land value as a key constraint and there is a pinch point where forestry cannot compete. Our research shows that the average land value in England is just under £8,000 per acre, or £5,000 per acre for poor livestock land. However, in Scotland, where a lot more planting takes place, suitable land is generally below £2,000 per acre, meaning the case for conversion to productive forest is easily made."

Source: https://www.savills.co.uk/research_articles/229130/239002-0

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.:

SANA has no locus to comment on this matter other than that given in our response to question 3 above.

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?:

SANA has no locus to comment on this matter other than that given in our response to question 3 above.

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.

Are there others not listed above?:

SANA has no locus to comment on this matter.

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.:

SANA has no locus to comment on this matter.

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.:

SANA has no locus to comment on this matter.

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.:

SANA has no locus to comment on this matter.

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.:

SANA has no locus to comment on this matter.

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.:

SANA has no locus to comment on this matter.

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?:

SANA has no locus to comment on this matter.

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

SANA has no locus to comment on this matter.

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.:

SANA has no locus to comment on this matter.

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.:

As noted above, there must be a relationship between forestry grant support and River Basin Management Planning to ensure that forestry development does not compromise water-related biodiversity.

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?:

SANA has no locus to comment on this matter.

Small scale mixed land use?:

SANA has no locus to comment on this matter.

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

Please add your comments here.:

About you

What is your name?

Name:
[redacted]

What is your email address?

Email:
[redacted]

Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:
Scottish Anglers National Association

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

Publish response only (without 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