

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.:

In our neighbourhood of Highland Perthshire land for forestry is currently being sold for extraordinary amounts. It feels as if the government grant support for forestry is being exploited to benefit private individuals and faceless corporations who gain tax benefits as well as grants. Do the government grants serve their original aim? It no longer seems as if forestry is a high risk investment, given the amount of profits being made; and if it is such a profitable industry (at least to the land owners) why does it need government support?

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.:

Probably the question we would like to ask is for improved accountability in the forestry industry, perhaps more in line with what is being asked of the agricultural sector.

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.:

There seems to be a mismatch between expert knowledge and what is happening on the ground when it comes to the role of carbon sequestration, and reacting to the climate change and biodiversity loss crises. Planting the wrong trees in the wrong place has led to catastrophic changes in land use in Scotland. This has not been the panacea for achieving net zero, and is adding to future problems relating to climate change and biodiversity loss. Why should the public, stakeholders and Scottish taxpayers continue to pay for a forestry industry that disregards expert biological science? A support package needs to ensure that better scientific knowledge filters through to the industry and holds it accountable.

We have experienced this at first hand in our neighbourhood, where we have sought to protect some 14ha of ancient historic and biodiverse wet grasslands landscape (Boheadlag in the Grandtully hills) from inappropriate woodland expansion by the forestry management of Griffin Forest, Perthshire. In this situation involving Scottish Forestry, Tilhill Forestry and the owners/now sellers of Griffin Forest, Guy Hands and his company Terra Firma, we encountered a situation where the forestry management had assigned carbon calculations for an area that already had historic carbon sequestration benefits and which would have continued to do so if left alone. There is insufficient consideration for local circumstances and inadequate public engagement. Management on the ground - at a day to day level - are adding to long term problems for future generations.

Recent scientific analysis that we have come across includes:

"In the northern hemisphere, species such as Sitka spruce (*Picea sitchensis*), Douglas fir (*Pseudotsuga menziesii*), larch (*Larix*) and various pine (*Pinus*) species are commonly grown in plantation forestry... All of these species are fast-growing softwoods suited to production forestry but not necessarily to carbon capture. If these trees are planted in the wrong place, for example, in peatlands and some grasslands, they can actually displace more carbon than they capture because these natural habitats are more effective carbon sinks than the trees that replace them. In virtually all cases - because they are non-native species planted as monoculture - they create sterile landscapes, disrupting native biodiversity." [Dr Paul Smith, *Trees from Root to Leaf* 2022, p152]

And from the John Muir Trust's journals:

"Industrial-style commercial planting with large-scale soil disturbance during the mechanical planting operation, followed by clear-felling, produces a huge loss of carbon by changing soil dynamics far into the future. [John Muir Trust's Journal no 20 Spring 2021]

And

"Worse still, when [Sitka] sited on unsuitable soils, they can release decades of stored carbon during planting and felling". *Climate Control* (pp16-19) John Muir Trust's Journal no 73, Autumn 2022,

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,

Not sure

Please explain your answer in the text box.:

We are sure that this is theoretically true. However the grant support mechanism needs to be sufficiently allied to the best science out there to achieve these goals, so that achieving 'natural capital' and 'carbon schemes' are not simply tick box form filling exercises to receive grants and don't actually fulfil the function they intend. For example, Butterfly Conservation's magazine Butterfly issue 142 Spring 2023, has an article 'Managing Forests for the Future': biodiversity, complexity and sustainable forestry seem to be a possibility with effort and commitment. We have to move away from the simplistic solutions that the forestry industry feeds us, something that government regulators need to take on board. (Employing experts in this field, not just forestry graduates, perhaps?)

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.:

The current funding package needs to take seriously the challenges of the climate and biodiversity crises, epitomised by the outcome of the "30 by 30" target agreed at the December 2022 Cop15. This means that when long-term forest plans are put forward, the details for so-called biodiversity and landscape value meet these goals, and that they are rigorously scrutinised before funding packages are agreed. This needs to take into account local circumstances, and should require full public consultation and follow-up.

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?:

There needs to be greater accountability for the management of existing and future woodlands. Let us not forget that Sitka Spruce is a non native species and the recently published Plant Atlas BSBI (Botanical Society of Britain and Ireland) paints a stark picture of habitat loss for native species in Scotland in relation to the range of spread of sitka. The results have inevitable implications for native biodiversity, insects and other species which rely on the plants they evolved alongside. Afforestation is not a panacea to reaching net zero. The carbon stored in trees is unstable - at risk of fire, flood, disease and drought - all becoming increasingly frequent and severe in an uncertain future of climate change. Living in the shadow of Griffin Forest, for example, the prospect of a forest fire in its "5 million" trees doesn't bear thinking about.

Our local experience is that commercial forests are not well managed for the long term and while claims are made that they are planted to store carbon these are in fact ecologically poor environments are often displacing high priority habitats, such as the ancient species-rich grassland we have been attempting to protect. The grant support scheme needs to be more than a tick box exercise and evidence-based.

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?:

Accountability, evidence-based and ideally independent advice perhaps.

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.:

Scottish forests are often vast and likely to be owned by single owners or corporations. This doesn't feel like a long-term solution. The forestry grant scheme is exacerbating the high value of the land, which makes it out of reach for many smaller scale woodland or environmental schemes. Smaller woodlands would have greater flexibility in ensuring a better balance between ecological and economic functions. Anecdotally, it also seems as if agriculturally productive land is being lost to higher paying forestry interests, no doubt fuelled by the forestry grant schemes. Perhaps there should be a cap on forests over certain sizes?

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.:

no comment

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.:

Grant support for forestry needs to be conditional on how the long-term forest plans reflect the needs of rural communities, in line with meeting the challenges of the climate and biodiversity crises, and the "30 by 30" target agreed at the December 2022 Cop15. These goals must reflect the needs of local communities, who live next to plantation forests, as well as serving national targets. Evidence of community consultation and engagement needs to be shown before grant support is made. Too often this becomes a tick box, 'infographic' oriented and self-fulfilling experience.

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.:

As in Q10, evidence of community consultation and engagement needs to be shown before grant support is made. Public consultation often becomes an end in itself, and the information provided by the 'public' is too often ignored, becoming a tick box experience with 'infographic' style response and becoming a self-fulfilling prophecy (ie the plans get approved anyway). As an example, the management company of Griffin Forest, Tilhill, are on record wanting "the public" kept out of the processes of forestry planning. (See <https://forestry.gov.scot/sustainable-forestry/ukfs-scotland> - 'Consultation document on UK Forestry Standards: proposed key changes').

Perhaps a greater sense that we are all in this together would be welcome. At the moment the forestry industry has a poor image - owning up to the great harm that has been caused by plantation forestry would be a starting point. Engaging with science-based research and being seen to promote these approaches in the long term management of forests in Scotland would be good start.

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.:

We are not sure how accessible this information is at the moment. In our experience it has taken freedom of information requests to obtain certain pieces of information. The claims about carbon sequestration should be readily available, and in such a form that is clear to the general public. This should apply to carbon offsetting grants as well.

Without forest regulations and accountability how can the public be sure that the forestry management are meeting the public's best interests?

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 sure

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

We live in a small community beneath the largest privately owned commercial forest in Scotland and we question how you would quantify these benefits to us? Access to the forests for recreational needs is one answer (although this is a right under Scotland's right to roam legislation) and there would possibility be indirect benefits for local service businesses. But this seems quite unquantifiable. This area depends on tourism - better environmental management of commercial forests would lead to new opportunities in the long term.

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.:

not sure

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.:

In our experience of living near several large commercial forests they are not providing the ecological benefits and the sustainable environments that they often claim to be; for example, Griffin's sale portfolio talks of "DNA detected from 359 species". This compared to research that shows that a single ancient oak tree contains at least that number of species. Biodiversity science is complex: "... planting exotic trees as a quick fix for carbon sequestration potentially disrupts the web of species interactions associated with the species that 'belong' to a place" Professor Anne Magurran ReSource, RSE Spring 2023 Journal (May 2023)

Not only are we losing local historic landscapes - overwritten by forestry plantations - but we are losing untold distinctive species that have been pushed to the edges by woodland creation schemes. For example the catastrophic decline of habitat specialist butterflies, such as the red-listed Pearl-bordered Fritillary butterfly (*Boloria euphrosyne*) and the Small Pearl-bordered Fritillary (*Boloria selene*) is a consequence of less open woodland management, insensitive tree planting, changes in grazing levels and misunderstanding the biodiversity value of open landscapes (such as those that have areas of bracken that are vital in the life cycle of these particular butterflies). Overlooked species need to be taken into consideration before approval of woodland schemes, whatever their tree mixture. Waxcap grassland fungi (*Hygrocybe* spp), for example, are found on ancient grasslands and are a sign of historic carbon sequestration.

Alistair Whyte, Director of Plantlife Scotland described Waxcaps as "botanical treasures ... endangered, brightly coloured fungi which Scotland has international responsibility for. Given the sharp decline in waxcap fungi, it is of paramount importance that we safeguard this population of exotic, multi-coloured beauties."

Grant support schemes must be more flexible and take into consideration the special features of the landscape, specific habitats that are relevant to the local historic and natural environment. Again, engagement with local communities is vital to ensure this.

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 understood that there were grants available for this already.

In general this is a good thing - the deer population in Scotland is at catastrophically high levels.

Small scale mixed land use?:

However, biodiversity requires good overall land use management. Deer fencing and losing grazing animals can seriously impair the biological functions of small scale mixed land use: ancient grasslands for example (see Q16 re Pearl-bordered fritillaries and wax cap fungi). Land use management is a complex business.

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

Please add your comments here.:

In our local experience, we have seen the prospect of forestry being grant funded for creating areas of "Landscape/Biodiversity" in parts of Griffin forest, while at the same time destroying historic areas of "Landscape/Biodiversity". This is not right. The taxpayer would be paying for areas of so-called carbon capture and landscape biodiversity, while land that was misrepresented in terms of its biodiversity function was inadequately described as 'open ground'.

The processes of forestry management seem to the outsider as a bit of a closed shop.

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Individual

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Organisation:

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