

Response ID ANON-MZ2Y-MTB9-E

Submitted to **The Future of Forestry in Scotland**

Submitted on **2016-11-08 14:57:53**

Introduction

Are you responding as an individual or an organisation?

Organisation

What is your name or your organisation's name?

Name/orgname:

Scotland's Rural College (SRUC)

What is your email address?

Email:

jane.atterton@sruc.ac.uk

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response with name

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

Yes

Please indicate which category best describes your organisation. If you are a representative or umbrella body, please tick the category you represent:

Other (please state below)

If 'other', please state here::

Higher Education Institute (HEI)

New organisational arrangements in Scotland

1 Our proposals are for a dedicated Forestry Division in the Scottish Government (SG) and an Executive Agency to manage the NFE. Do you agree with this approach?

Yes

Please explain your answer:

Yes, if the Forestry Division is to exercise regulation and authority over the industry both private and public. There needs to be complete separation between the two for transparency and independence.

2 In bringing the functions of FCS formally into the SG, how best can we ensure that the benefits of greater integration are delivered within the wider SG structure?

In bringing the functions of FCS formally into the SG, how best can we ensure that the benefits of greater integration are delivered within the wider SG structure? :

Scottish forestry, and the range of production, environmental and social aspirations for it, would benefit greatly from being linked in to wider SG policy and delivery. There is currently a tendency within Scotland to translate the 10,000 ha per annum planting target as meaning that large blocks of primarily productive conifer are all that can deliver towards that target. As the consultation document recognises, there is a need for more such woodland and forest to maintain a timber supply into the future. But the rationale behind the desire to have more trees on the ground in Scotland was also to help sequester carbon and mitigate climate change. In that respect, increasing the number of trees in hedgerows, establishing more riparian woodland next to watercourses and creating shelter belts on farmland all have a role to play in meeting the 10,000 ha target. Integrating the functions of FCS into the wider SG structure could potentially help ensure that much more of such a range of woodland creation and management can occur in association with other arms of SG.

What additional benefits should we be looking to achieve? :

The SG needs to fully understand the range of benefits delivered by forestry including health, carbon storage and capture, timber, flood mitigation, farming and all the industries it impacts and ensure the Forestry Division is given a voice on all of these issues. The SG needs to get the Forestry Division involved to help all other SG departments understand these benefits and to encourage them to buy into them.

3 How should we ensure that professional skills and knowledge of forestry are maintained within the proposed new forestry structures?

How should we ensure that professional skills and knowledge of forestry are maintained within the proposed new forestry structures?:

The Forestry Division needs to be made up of forestry professionals with forestry experience. In recent years the Forestry Commission has been taking on graduates of other disciplines with no forestry background or training. This has produced "box tickers" who have no understanding of the complexities of woodland creation or management beyond theory which leads to impractical suggestions being introduced by the Woodland Officers and limited flexibility in their approaches.

4 What do you think a future land agency for Scotland could and should manage and how might that best be achieved?

What do you think a future land agency for Scotland could and should manage and how might that best be achieved?:

They should continue to manage the National Forest Estate but with more management input from other forestry professionals from the commercial sector to help achieve the best financial outcomes for the SG. This also should apply where they take on perhaps the management of statutory designation sites i.e. SSSI's etc.

Effective cross-border arrangements

5 Do you agree with the priorities for cross-border co-operation set out above, i.e. forestry research and science, plant health and common codes such as UK Forestry Standard?

No

6 If no to question 5, what alternative priorities would you prefer? Why?

If no to question 5, what alternative priorities would you prefer? Why?:

These three areas clearly need continuing collaboration and hence should form part of the priorities set out for cross-border collaboration. Without collaboration this will be unsuccessful.

It will also be essential that these three priorities be supplemented by continued co-operation on international forestry policy, inventory and forecasting, economics and statistics. All of these are vital to the economic and environmental future of the sector in Scotland and there is significant benefit to be gained by retaining the ability to have common data and reporting across boundaries and of continued co-operation and collaboration on the development of international forestry policy.

7 Do you have views on the means by which cross-border arrangements might be delivered effectively to reflect Scottish needs?

Do you have views on the means by which cross-border arrangements might be delivered effectively to reflect Scottish needs? :

It is unclear from the consultation document what mechanisms are being proposed to ensure such cross-border cooperation and collaboration. Note that the Joint Nature Conservation Committee (JNCC) was created at the time of the break-up of Nature Conservancy Council into SNH, English Nature etc. The JNCC was supposed to have a similar cross-border collaboration role that seems to be being proposed here for Forest Research. However, after 25 years it is unclear how effective that co-operation and collaboration is being achieved at the expense of simply being a common point for consultation and data gathering. It might behove the Scottish Government to look more closely into examples such as the JNCC to see what has worked and what has not in the past before fixing on how Forest Research should be badged/regulated.

Legislation and regulation

8 Should the Scottish Ministers be placed under a duty to promote forestry?

Yes

9 What specifically should be included in such a general duty?

What specifically should be included in such a general duty?:

There is currently a tension within Scotland between ensuring that the Scottish forestry sector continues to be productive, and thereby continues to make a major contribution to the rural economy in the future, and also ensuring that woodlands and forests contribute to a wide range of social and environmental outcomes, including climate change mitigation, biodiversity, natural flood management, recreation and people's health and wellbeing. However, in reality these production, environmental and social objectives are not always mutually exclusive. Indeed, if existing and new productive forests were restructured or designed to make them much more resilient to climate change challenges, many of these other environmental and social objectives would flow from them naturally. Similarly, if more native woodlands were managed more appropriately, or even just managed at all, they could also become more 'productive' from the economic, environmental and social perspectives. Hence the general duty should be to retain a focus on the economic, environmental and social benefits of forestry. It should also prevent deforestation, much of which has happened on the National Forest Estate, for the creation of windfarms without any compensatory planting. The Forestry Division should control the regulation of all forestry felling and replanting by taking this away from Local Authorities in planning cases.

10 Recognising the need to balance economic, environmental and social benefits of forestry, what are your views of the principles set out in chapter 3?

Recognising the need to balance economic, environmental and social benefits of forestry, what are your views of the principles set out in chapter 3?:

The consultation document as a whole and Section 3 in particular focuses very much on the production and rural economy aspects with little or no indication as to how the wider social and environmental aspects will continue to receive priority and be quantified. This is a major gap in the document as it currently stands.

Assessing impact

11 Are there any likely impacts the proposals contained in this consultation may have on particular groups of people, with reference to the 'protected characteristics' listed in chapter 4? Please be as specific as possible.

Are there any likely impacts the proposals contained in this consultation may have on particular groups of people, with reference to the 'protected characteristics' listed in chapter 4? Please be as specific as possible.:

It would appear unlikely there would be any adverse impacts on particular groups of people.

12 Do you think that the proposals contained in this consultation are likely to increase or reduce the costs and burdens placed on any sector? Please be as specific as possible.

Do you think that the proposals contained in this consultation are likely to increase or reduce the costs and burdens placed on any sector? Please be as specific as possible.:

No

13 Are there any likely impacts that the proposals contained in this consultation may have upon the privacy of individuals? Please be as specific as possible.

Are there any likely impacts that the proposals contained in this consultation may have upon the privacy of individuals? Please be as specific as possible.:

It would appear unlikely that any such impacts would occur.

14 Are there any likely impacts that the proposals contained in this consultation may have upon the environment? Please be as specific as possible

Are there any likely impacts that the proposals contained in this consultation may have upon the environment? Please be as specific as possible :

Increasing woodland cover across Scotland from the current 18% to the targeted 25% by 2050 is feasible in principle. It is not yet known whether or not these new governance arrangements in Scotland will help stimulate more action on the ground to manage, restock and create woodlands and forests across the full range of scales that will be required to meet the production, environmental and social objectives.

Nevertheless, the current focus primarily on productivity in a productive forestry sense leads to concerns that the environmental and social impacts may not be achieved in practice if so much emphasis is put on production per se. The forest industry has come a long way since the poor practices of the 1970s and 1980s and this proposal must ensure that this progress is not reversed or damaged.

Any other comments

15 Do you have any other comments that you would like to make, relevant to the subject of this consultation, that you have not covered in your answers to other questions?

Do you have any other comments that you would like to make, relevant to the subject of this consultation, that you have not covered in your answers to other questions?:

No

Evaluation

Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Neither satisfied nor dissatisfied

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Slightly satisfied

Please enter comments here.: