

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.:

SEPA agrees that the FGS should continue to be improved and developed based on good case studies, improved science and better understanding of integrated land management principles. The main issue associated with the FGS operating as a discrete scheme, is this may promote a silo management and delivery mechanism which flies against the aspirations of integrated land management as outlined in the Ministerial Foreword. In much of Scotland, forestry and agriculture are seen as very different land uses, however, there is the potential for each to benefit from the other to deliver opportunities in addressing both climate change and biodiversity crises. A challenge for the FGS, whether it remains as a discrete scheme or delivered in line with other land support schemes, is that it needs to promote and encourage better integration with agriculture. Agroforestry, combining commercial conifer forestry, riparian broadleaved woodlands, hedgerows, shrubs and pollinating plants has the potential to deliver benefits to forestry and agricultural businesses, nature restoration, flood management, soil protection & health, carbon sequestration as well as improved water and air quality. A preferable solution would be to develop an FGS that can be both standalone but also has outer links to other land support packages.

It is also vital that the reviews of UKWAS, UKFS and FGS are synergistic in delivering nature-based solutions and multiple ecosystem service outcomes under the umbrella of an incentivising FGS. Great focus should be placed on the riparian zones and promoting responsible riparian zone management to explore and exploit the huge potential to address both climate change and biodiversity. The riparian zones are often overlooked, undervalued, and under exploited given the huge potential they offer in terms of carbon and biodiversity, a revised FGS needs to place greater 'value' on addressing this to promote the key benefits and financially reward landowners for incorporating this into their forestry Land Management Plans and Operational Plans. The waterways are the lifeline arteries for riverine ecosystems and the vegetation along those riverbanks are equally important and interdependent. The current draft of UKFS Forestry Standard Practice Guide: Creating & Managing Riparian Woodlands, needs to highlight these benefits, their importance and the beneficial outcomes good riparian zone management can bring.

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.:

Tailoring options within the FGS to ensure that they could be more easily implemented at farm level and catering for different farm types, different planting scales and planting model options [Right Tree, Right Place etc]. This means providing flexible options which can be applicable from field scale up to sub catchment scale, catering for changing topography, geology and soil types. One of the barriers often quoted to FGS uptake is that the scheme does not support planting trees in field corners, riparian areas etc due to minimum planting areas, densities and variable corridor widths due to natural features or soil reasons. There needs to be more grant scheme fluidity especially for riparian zone management to move away from the overly rigid planting distances, minimum riparian zone widths and tree densities to delivering a scheme based on site specific factors. Funding options should be equally 'fluid' to match this which will deliver a more natural scheme.

Options within agricultural and forestry schemes could be designed to be more complementary such that actions encouraged under one scheme can build and complement the other such as interchangeable environmental credits? Consideration should be given to the possibility of assessing and scoring applications together (from the same applicant or area of land), such that the overall contribution to environmental outcomes delivered by both applications could be scored as one rather than each application being scored individually. In addition, multiple landowners should be encouraged to unify applications to benefit river catchments or sub catchments at a larger scale to deliver harmonious projects, good ecosystem service outcomes and arguably better value for money.

The Forestry Cooperation Fund (FoCo) engaging landowners, scoping sites, designing eligible schemes, and applying for grants is complicated and potentially expensive with only exceptionally keen farmers/landowners able to complete the very detailed application process. The alternative is the use of a consultant at considerable expense and added to this may be the cost of surveys, all of which may not be refunded if the application fails. The FOCO option has had limited uptake to date. It provides funds for groups of farmers to coordinate woodland planting effort, and this can be used to support local consultants, agents or eNGOs to draw up collaborative schemes. However, the FOCO application process necessitates obtaining signatures from four landowners who are willing to participate. This means that a lot of the facilitation/design work that the fund is designed to cover actually has to be done before the application process in order to secure a signature. Many landowners will not sign up until they have seen a scheme and a budget sketched out. The FoCo option should be refined to make the process slightly easier.

The solution would be to streamline the application process with funding made available via, and integrated with, the FGS (Forestry Grant Scheme) application process for plan preparation and aid towards survey costs. In addition, review and streamline the FOCO parameters to allow this funding to be available for individual applications as well as collaborative schemes.

Stock Watering and Water Gates - alternative watering is not an eligible item under FGS can be a major disincentive to farmers planting trees. AECS (Agri Environment Climate Scheme) grants do cover stock watering (pipework, troughs etc.) but are difficult to qualify for without a large and comprehensive whole farm scheme (costly and risky to draw up). Also, there is currently no capital option for the provision for water gates that can be costly and time consuming to the landowner both for installation and maintenance but are critical for comprehensive riparian woodland schemes. Stock watering and water gates should be made an eligible cost under FGS.

Agri-Environment Climate Scheme (AECS) Grazing Anomaly, AECS requires only a minimum 2m water margin buffer but can go up to 20m on either side of a water margin in certain cases. Individual trees can be planted, but the grant conditions stipulate that the area needs to be left open to occasional grazing which severely damages or kills the trees. There should be a derogation of the Agri-Environment Climate Scheme (AECS) occasional grazing condition to allow trees and riparian edge vegetation to fully establish.

Landowners and farmers should continue to receive financial support on areas planted through FGS or in AECS via the Back Payment Scheme [BPS]. This is a significant positive. However, planting delivered via alternate funding may then negate the land being eligible for BPS which can be a significant negative for farmers and landowners and prevent planting from occurring. Continue to allow the Basic Payment Scheme to be claimed on areas of land under the Forestry Grant scheme (FGS) or the Agri-Environment Climate Scheme (AECS) but also on schemes delivered out with FGS and AECS funding. One issue that links both farming and forestry sectors is the value placed on good soil management. The standards for both sectors could either be harmonised or contain common denominators, so landowners have to achieve a similar level of soil quality to qualify for grant support. This would encourage right tree, right place; good land management principles, best optioneering for access tracks and low-impact methodologies selected for harvesting & restocking. Avoidance of soil degradation through inappropriate land management practices can be avoided via good site planning. Soil protection reduces soil loss, reduces greenhouse gas emissions through carbon release; reduces the risk of diffuse pollution and also promotes a healthy carbon balance. FGS could promote good soil management throughout the forestry cycle in parity with the same principles applied to good farm soil management.

## 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.:

Climate change will present a number of challenges to forestry. Planting now must consider the increased threat in the future from such issues as water scarcity, exotic disease, fire risk etc. It is important that adequate consideration is given to these and ensure sustainable measures are built-in to woodland creation/restocking to minimise the future risk of failure or increased reliance on pesticides. Where possible, appropriate conditions should be built into the option requirements to ensure applicants take adequate account of future risks and put in place suitable contingency measures where appropriate.

Whilst there is adequate protection of shallow and deep peats for new woodland creation schemes, there is an automatic assumption to Restock forests located on shallow/deep peats under current Scottish Forestry Restocking Guidance. This flies in the face of the carbon focus contained within the Ministerial Foreword, Scottish Government carbon targets and biodiversity protection and environmental improvement as well as the focus on peatland restoration. Whilst the national programme for peatland restoration should be enhanced and accelerated for the climate change & biodiversity benefits it brings, this should go hand in hand with a cessation of automatic restocking on shallow & deep peats with such areas promoted instead for peatland restoration. It seems environmental folly to plant new trees to sequester carbon and yet automatically approve shallow & deep peat conifer restocking if the land has previously been afforested. This is not Right Tree, Right Place. The current Guidance entitled Cultivation for Upland Productive Woodland Creation Sites, 2021 should be reviewed to include restocking sites.

FGS should have greater focus on the protection of Scotland's 23,000 private water supplies most of which are located on either our forest or farmscapes. That protection applies to new woodland creation schemes and also felling/restocking areas where there is greatest potential for pollution and/or water scarcity pressures from water hungry conifer crop planted too close to water source areas. The same pressure applies to water abstracted for large distilleries, inland fish farms and bespoke industries that depend on good quality freshwater such as cheese/yoghurt making, micro-breweries/micro distilleries etc. Support packages should demand appropriate environmental assessments to protect these residential and business interests, whilst also promoting tree planting.

Tree planting densities will attract varying levels of risk from disease, fire and water resource competition for water. The draft UKFS is still proposing a maximum total conifer cover of 65% single species e.g., Sitka Spruce and 20% secondary conifer species. The industry seems to have moved away from tree thinning and thus dense stands of conifers, especially in key production areas such as South Scotland, Argyll and Sutherland, will pose greatest risk. A revised FGS to reduce total conifer planting densities and deliver a more mixed and balanced forest plan would not only improve and address the biodiversity crisis but also reduce risk of fire and disease spread. The draft planting percentages need to be revisited.

Good soil management outlined in Q2 above, can promote healthier trees which then offer greater resilience to pests and diseases.

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.:

FGS funding is designed to cover around 85% or so of eligible costs. This means that at least 15% of the actual capital costs need to be found elsewhere, and it is increasingly possible to find funding through carbon sequestration brokers operating under the Woodland Carbon Code. This funding can often provide much more than 15% funding and in certain situations may actually be able to provide the majority. The development of green financing will likely be another significant source of external funding in the future. However, the FGS administration system makes it difficult to take advantage of these situations and an adjustment to the administration systems to allow variable FGS grant rates to lever in more private finance and lower cost to the taxpayer is required.

There does need to be flexibility to allow landowners and managers to access grants alongside private finance to make riparian and native woodland creation viable and provide the wider public benefits that river woodlands provide.

SEPA's morphological surveys of river channels and riparian bank vegetation (2015/16) together with remotely surveys covering the baseline river network, found 56% of the bank length is in poor condition due to lacking tree cover (<5%) and containing uniform or bare structure.

Native riparian and floodplain woodlands have an essential role in carbon and nutrient cycling linking land to water and water to land, and recycling

nutrients and carbon from source to sea (MacKenzie, 1996; Schumutz & Sendzimir, 2018). They underpin the biodiversity and ecosystem health of rivers. SEPA's modelling for targeting river restoration on baseline rivers shows that an estimated 130,000 ha of river woods is needed within Scottish river landscapes to help restore our rivers. The need for private investment is clear. At current rates of Scottish Forestry (SF) grant targeting 4000ha of native woodland per year, the 130,000ha modelled river restoration target would take until 2055 to deliver. With reference to the diagram below, assuming incremental increases in private finance and the use of blended finance the target could be delivered 10-15 years earlier (2040-2045). Influencing and securing private investment is therefore a critical element in achieving climate resilient rivers and communities. The investment needed is estimated to be between £500M to £780M.

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.:

Forest and water guidelines have been a positive step in addressing historic environmental issues. The riparian zone within commercial softwood plantations are now relatively large and have considerable potential. However, the guidelines are often interpreted as a means to avoid negative impact on water and watercourses rather than setting out proactive steps to deliver multiple benefits for both new plantations and restock sites. We need to produce better and more positive guidance to ensure maximum benefit is achieved and influence Scottish Forestry to ensure woodland officers interpret guidelines to obtain maximum benefit for riparian areas.

Forestry has the potential to offer a multitude of benefits. Targeting planting to priority areas where they can offer the greatest public benefit will help increase resilience. Future climate change will increase the risks of habitat loss, floods, soil erosion etc in some areas. The right type and species of woodland in the right area can help to reduce and slow / delay run-off, retain rainfall, connect habitats and protect vulnerable areas.

SEPA submitted comments into the UKWAS review process, and we are satisfied that the revision awaiting final publication sign off, contains greater reference to good site waste management practices as part of the site FSC/PEFC certification. Satisfactory waste management practices now form part of the site audit carried out in the certification process. In parallel, SEPA's comments submitted into the UKFS review process places similar focus in demanding good waste management practice is followed in Reducing; Reusing and Recycling of materials used in the forestry sector.

SEPA's forestry inspection work has revealed poor waste practices are present in many areas with a range of waste materials found on site including caravans; abandoned machinery & equipment; planting bags; drums, Terram netting and vehicle refuse. However, the biggest source of waste material found relates to tree guards. In some cases, the tree guards have been partially collected for the piles to remain on the landscape and in other cases the tree guards are partially hanging off the growing tree or left on the ground as the tree has burst out of the casing.

With the worldwide focus on microplastics and the risks of environmental damage, many of these abandoned tree guards are old and brittle, photodegrade and break up to the touch generating large volumes of microplastic which can find its way into the land drainage channels and ultimately our river systems. Scottish Water has also raised concerns that microplastic can pose a water quality issue to their water treatment process if tree guards are left uncollected on the landscape around any drinking water reservoirs.

Whilst SEPA recognises that landowners may prefer to take advantage of 'collect & recycle' schemes for the traditional plastic tree guards, this system is not working given the large numbers of tree guards found abandoned on the forest scape. In addition, many areas planted with broadleaves become inaccessible due to the faster growing conifer crop surrounding the native trees and blocking or limiting vehicular access. SEPA would recommend that revisions to the FGS should contain incentives for landowners to capitalise on using truly biodegradable tree guards which breakdown into naturally found components that are retained on the landscape for microbial decomposition.

An example of this would be the new range of biodegradable tree guards made from sheep's wool. If left on the landscape, these will biodegrade over time and will not pose an environmental impact risk. The 'use it once' tree guard can save the landowner money as the cost of sending teams of people out to remote sites to pick up, remove and transport the plastic tubes to the recycling centres is nullified. This reduces transport miles and carbon emissions. The sheep's wool option also offers farmers a solution to the current low wool price whereby tonnes of good quality wool are either burnt or dumped unused. Reusing wool is a good circular economy option and is a good example of cross-land sector partnership working to resolve an issue. FGS can strengthen this cross sector integration by incentivising forestry companies to use such tubes.

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?:

Yes, as noted in response to question 3, forestry is a long-term land use, it is therefore essential that planting now, takes account of future risks. Natural solutions should be sought to control pests and diseases as opposed to increased chemical use e.g., promotion of 'thinning' as a forest management tool which seems to have become less common and when undertaken poorly, can lead to gross pollution incidents.

### 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?:

In addition, information on how it has worked well for other land managers through case study reviews (including from other countries), demonstration farms and by adopting a 'monitor farm' approach to gather and sell ideas and concepts to other landowners.

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.:

Support levels need to take account of situations where economies of scale can't be achieved. In addition, extra credit or points should be given for collaboration to encourage smaller landowners to work with neighbours to deliver larger, landscape scale projects with larger landscape scale benefits for climate change and biodiversity. Funding for facilitation and advice would help in this regard.

Small woodland schemes could attract greater funding streams if tied in with 'other' benefits e.g., animal welfare from shelter belts. Hedgerow planting will be linear and small scale in terms of area/volume compared to traditional woodland schemes, but if planted either side of the barbed wire fence, will dramatically improve habitat potential for birds and wildlife as well as providing an improved 'vista' for local tourism. Animal welfare would also improve from shelter benefits. Hedgerow planting would also generate a 'need' for trained operators in traditional methods which can also stimulate a college training course demand as well as an economic bonus in job provision in traditional countryside management.

#### 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.:

Woodlands close to urban areas often have specific design criteria which may influence the species of tree planted, accessibility and public safety measures. Option requirements and conditions, payment levels, supporting capital items etc will help to support the development of woodlands in urban areas. Payment levels should recognise the multiple benefits woodlands and open green spaces can have on personal well-being and mental health.

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.:

As previously mentioned, agroforestry has much to offer rural business.

Spatial targeting is a fundamental element whereby grants can be focused in areas where need or potential benefits are greatest. Multifunction woodlands which provide environmental benefits including carbon sequestration and nature restoration will provide wider public benefits. In areas where flood risk is present, targeted tree planting can offer longer term sustainable protection from flooding. Carefully designed woodlands can also offer opportunities for recreation and tourism which will benefit local residents, provide jobs and income for local businesses.

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.:

Woodlands have a significant impact on the landscape and communities where people live and work. Giving local people a greater say in how woodlands are established and managed should be encouraged. Schemes could encourage such community involvement by providing funding specifically for community engagement activities and potentially offer extra points or credit for those projects which have genuine local support.

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.:

Being open and publishing a summary of applications together with the reasons why applications have been funded or refused would be the simplest method. This would also encourage better quality applications by demonstrating the criteria which attract support. In addition, it would demonstrate to the public how public funds are used to deliver public benefits. In addition, greater use of Local Stakeholder Forestry For a to discuss and ensure local issues are addressed by the reviewed FGS which should contain a degree of flexibility to cater for local pressures and/or local variations which cannot be catered for via a nationally uniform, fixed and rigid FGS. For our rivers, such local pressures, variations and differences are outlined in Scotland's River Basin Plans.

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.:

The Forestry Grant Scheme 'Value for Money' [VFM] criteria simply focus on timber production and the ratio of area planted to the cost of tree protection/fencing. Thus, the linear nature of riverside woodlands often means they score badly. There should be more value attached to the wider benefits from riparian woodland planting such as reducing water temperatures, flood alleviation, diffuse pollution control, erosion control, biodiversity and providing ecological linkages. This will contribute to tackling both climate change and biodiversity loss. This can be achieved by expanding VFM scoring to recognise the wider benefits.

The Forestry Grant Scheme generally requires broadleaved trees to be planted at 1600 stems/ha. However, best practice suggests densities between 550-1100/ha would be more suited to create the most beneficial habitat for river systems. Similarly, open ground allowance is limited to 15% of the overall design. Allowing flexibility on planting density and open ground allowance within targeted riverside areas such as those identified as downgraded in Scotland's River Basin Plans, would enable more beneficial, better-quality schemes to progress.

Grant aid should also support assessment of land condition (soils, vegetation) for strategic land-use decisions and strategic planting or promotion of natural regeneration of trees to aid biodiversity net gain. The headwaters of our catchments need to be assessed well and to aid restoration initiatives to protect the water and land environment and downstream. And to aid a rebalance of nutrient cycling in our systems. With planting practice in general and especially away from core woodland remnants, for more successful establishment, mycorrhizal associations also need to be considered and how that can be addressed (and supported).

There have been recent changes to the Woods for Water target mapping element that are a significant step forward from previous versions in highlighting priority areas for planting. The target areas have also been increased to enable better, larger schemes to be considered. This should be viewed as a positive step forward and should aid the expansion of riparian woodland. However, the associated uplift grant payments are minimal offering little financial incentive and are further limited by the qualification parameters. The solution is to implement revised target area mapping and enable minor changes to occur on an ongoing basis to enhance viability of schemes.

To accompany the revised target area mapping, there is an uplift payment equivalent to 12.5% above basic area & maintenance payment rates that equates to £230/£34, respectively. Given that average riparian schemes are running at an average of 30-40% shortfall against the FGS, this uplift rate is too low to make a significant difference. Secondly, the uplift rate only applies if 50% or more of the scheme lies within the recognised uplift areas. This could limit the size of the scheme where maximising income is a priority. The answer is to offer significantly better uplift grant payments beyond 12.5% as financial incentives for riparian schemes. Remove the 50% eligibility rule to allow any areas within the recognized uplift area to be eligible for uplift payments and the equivalent area out with, if it is a connected native woodland compartment regardless of overall scheme size.

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?:

Fencing FGS offers a standard rate (£7.60/m) or in recognised areas an enhanced rate (£9.90/m) for deer fencing. FGS grant rates are fixed during the overall FGS scheme lifetime and this allows no flexibility against increased capital costs incurred, thus reducing the effective intervention rate making schemes less attractive financially. Fencing is one of the most significant costs incurred and currently the grant rates don't reflect the prescribed 80-85% intervention rate against current actual costs of £17.00-£23.00 depending on deer fence specification. This is particularly true in very remote areas where significant access issues exist and/or airlifting materials is the only option. It would make better sense if woodland officers had the ability to offer an enhanced uplift where really good schemes warranted it. We would expect to see a preference for planting on sites with proactive deer management taking place and management plans in operation. A revised FGS could offer greater flexibility on deer fencing uplift grant rates taking into consideration individual scheme restrictions and enable flexible standard fencing grant rates to address fluctuations in actual capital costs. Any promotion of deer fencing would also have to be accompanied by funding for redundant deer fencing removal for material reuse or recycling.

Current grant guidance for woodland creation does state that fencing is the preferred protection method as well as tree shelters. There is no mention of grants for supporting culling and support to the stalking industry to move to a more sustainable model for a more balanced approach to protect livelihoods but also land quality (soils, nutrients, habitats and biodiversity) and for a more resilient landscape. There is an agroforestry grant to include sheep and trees but what about deer and trees? Further support for a more integrated land-use model and training for land managers so farmers can also be foresters as well as hunters.

The installation of extensive lengths of deer fencing along linear riparian zones is questionable. Why we need to abolish forestry grants in their current form – the lessons from the Cairngorms - parkswatchscotland

The article sums up concerns in the Scottish Uplands, with grazing pressures and concerns relating to fencing and planting practices supported by the current grant scheme. This is also relevant to riparian woodland network expansion as fencing along long linear features are extremely challenging both practically and economically. Often increasing the length and width of the riparian strips will be more effective at delivering multiple benefits and can be linked to effective functional design elements of the woodland measures as well. Effective deer management and numbers control combined with larger riparian buffer strips and a 'no fencing' policy has worked successfully in Norway and there is no reason it could not work here.

Small scale mixed land use?:

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

Please add your comments here.:

For the forestry sector, there needs to be some form of Cross Compliance Scheme linking environmental performance [Compliance with standards & operational delivery] and certification. This can be used as a measure of operator/company 'competence' the measure for which is currently absent in the sector and is desperately needed given the non-compliance issues and contract focus on operator competency. This overall assessment of 'operator competency' can be linked to payment of FGS. Good quality operators working to a high standard of forestry excellence will receive good payment in a timely fashion. Conversely, poor quality contractors working to a sub-standard level and causing, or at risk of causing, environmental issues will receive a penalty payment scaled to the severity or number of issues caused. This is similar to the current Cross Compliance Scheme applied to the Agricultural sector and will align the 2 land use sectors for environmental compliance.

## About you

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Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:

SEPA

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