

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.:

Yes, except that the grant scheme needs fundamental reform. not just continuous improvement.

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.:

There needs to be a fundamental change in the targeting of grant support for forestry. Lowland areas, with better soil and climatic conditions, should become much more of a focus for tree planting to meet future timber needs as well as for carbon capture and biodiversity improvements. Lowland planting allows for a much wider range of species to be grown, with faster growth rates for many species and better opportunities for public enjoyment of woodlands.

The present Scottish Government position that the "focus of woodland expansion should be away from prime agricultural land" should be re-considered. The crop that is grown on any area of land should be the most appropriate for that area. There may be many tracts of prime agricultural land where the best crop to grow, to meet timber requirements, carbon capture, biodiversity needs and deliver local community needs, is a tree crop, rather than oil seed rape, barley, potatoes etc. There is no reason why the grant system cannot be re-configured to deliver this, without a massive reduction in the amount of prime land still left for growing annual arable crops.

Extensive tree planting in the lowlands will provide an opportunity to reduce the amount of land which is subject to annual cultivation, the repeated application of artificial fertilisers and pesticides, the pollution of adjacent water courses, loss of organic matter through cultivation, soil loss into watercourses and soil loss through wind blow.

It is also important to recognise that the UK is one of the most nature depleted countries in Europe, with intensive farming principally responsible for habitat loss and species decline. Furthermore, Professor Sir Ian Boyd, current co-chair of the Scottish Government's Environment Council and former Chief Scientific Adviser to the UK Government on Environment, Food and Rural Affairs said, in 2019, that half of the UK's farmland "needs to be transformed into woodlands and natural habitat to fight the climate crisis and restore wildlife". He added that farmers were potentially "sitting on a goldmine" in terms of the payments they could receive for growing trees and removing carbon from the atmosphere. He stressed the urgency to achieve this transformation - "we need a large, radical transformation and we need to do it quickly, in the next decade" (The Guardian 31st Dec 2019). Over three years of the "next decade" have already passed and it is obvious that this "radical transformation" will only take place, rapidly, if there are fundamental changes in the Scottish Forestry grant system, of which a key part must be incentivising farmers to remove land currently under intensive cultivation and convert it into woodland.

In the uplands there needs to be an increasing restraint on past tree planting practices and much future focus on natural regeneration to restore woodland rather than planting. The primary role of the uplands in Scotland in future should be to capture carbon and restore biodiversity. Planting large areas with a limited number of tree species and then harvesting those trees through the construction of massive road systems and use of huge vehicles and machinery to extract the timber needs to be scaled back, partly because of the carbon impacts of growing and harvesting trees in this way, but also because such forestry lacks resilience in the face of disease, wildfire and wind blow, but also because such industrial scale forestry has serious negative impacts on public amenity and enjoyment and biodiversity recovery.

A new vision is needed for the upland landscape in which woodland recovery and expansion is primarily based on the proper control of grazing animals, with the slow but steady recovery of trees cover but also the recovery of the huge range of other species, from shrubs, grasses, mosses, lichens to fungi. In areas where natural woodland cover is still present there should be a strong presumption against planting, with natural regeneration the focus of recovery up to the altitudinal limits for tree and shrub growth. In catchments where natural woodland is absent and planting is the preferred option it should be done in a way which maximises the carbon capture and biodiversity recovery values, usually involving planting over a long period of time to ensure a wide range of age classes. The expectation should be that timber production in the uplands in the future would be primarily to meet local needs. The focus for timber production to meet the needs of large scale processors should increasingly shift to more lowland areas where trees can more easily and rapidly grown to harvest stage and more readily extracted onto the public road system.

Where catchments contain fragments or ribbons of woodland or scattered trees, primarily along watercourses, there should be grant incentives to encourage the expansion of these remnants through natural regeneration.

It needs to be emphasised that scientific studies indicate that a naturally regenerated tree, during its lifetime, can capture up to forty times the amount of carbon captured by a planted tree over its lifetime. The carbon emitted in collecting the seed, planting and growing the sapling in the nursery,

transporting it to site, disturbing the soil in the planting process and any associated fertiliser, pesticide and tree shelter requirements represents very poor value for money as a means of capturing carbon when compared to a naturally regenerated tree which planted itself.

Meeting the above requirements will require a complete overhaul of the forestry grant system, probably moving to a more complex system, but one which is much more sensitive to modern day aspirations. It will also require massive culture and attitude change amongst landowners and foresters. The UK is unique among European countries in its dogmatic reliance on planting to meet the needs of forest replenishment and expansion. The one size fits all mentality that has dogged the forestry grant system for decades needs to be abandoned.

Aligned to new grants must be a completely new attitude to grazing animals and their relationship to tree growth. The restoration and expansion of woodland needs to be achieved without fencing. In both the uplands and lowlands the curtailment of deer fencing needs to be balanced with a substantial increase in the employment of deer stalkers. It is far better to spend public money on the employment of stalkers, especially if based in local communities, than on expensive deer fencing, with all the carbon emitted in its production and transport, and the disadvantages such fencing creates in terms of public access and enjoyment and the encouragement it gives to adjacent landowners to continue overgrazing of their land by excessive numbers of deer. Where sheep and cattle are present the use of stock fencing or "no fence" electronic solutions, which are likely to increase massively in future years, should be used where appropriate.

Finally it worth stressing that the above approach is likely to help the Scottish Government meet its net zero targets if the grant aid schemes that are promoted in the uplands recognise the value of naturally regenerating woodland for carbon capture. This is not simply about trees. When an area is subject to reduced grazing pressure, with the slow establishment and spread of naturally regenerating trees, the whole of the vegetation complex is responding. The extra carbon being captured and stored by the new growth of shrubs, especially heather, grasses, mosses and lichens, through the reduction of grazing pressure is as important as the tree growth. Targets based purely on the number of trees planted is a hopelessly simplistic way of looking at carbon capture. The carbon captured by the whole vegetation complex needs to be taken into account, with the recovery of large tracts of moorland, accompanied by the steady spread of regenerating trees, bring a key component of the calculations.

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.:

See answer to question 2

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.:

While this is a good idea in principle it needs a much stronger regulatory mechanism put in place ensure that the private finance is positively contributing to the strategy outlined in my answer to question 2, is going to achieve long term public benefit, and is contributing to the needs of both the local community and the wider public who expect to be able to enjoy the new woodlands.

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.:

See my answer to question 2.

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?:

By maximising the amount of new woodland that is established through natural regeneration, which ensures genetic diversity and promotes the widest possible range of age classes in the new woodland.

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?:

Providing examples from Norway where woodland management is regarded as a normal integral part of any farming operation. Scottish Government officials need to visit Norway and learn how their grant system helps farmers to manage woodland across a wide range of climatic zones, many of which are similar to Scotland's.

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.:

Higher grant levels, per hectare, for smaller woods.

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.:

Securing land is often problematic in urban and peri-urban areas and this frustrates attempts to establish woodland, especially by community groups. There needs to be much more willingness on the part of local authorities to facilitate this process by using their existing compulsory purchase powers. Once acquired, such land areas can be transferred, if appropriate, to local community groups or NGOs.

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.:

An important opportunity for woodland expansion relates to problems of public access in rural areas. We need to move to a position where every community is connected to its neighbours through off road paths, parallel to the public highway, for use by non motorised citizens, Such a network would have a massive impact in reducing motor vehicle use and enhancing public wellbeing in respect of contact with nature and physical activity. This could be facilitated by establishing strips of woodland parallel to the public highway and containing formal or informal paths to help citizens travel between their communities. This could be a major objective of the forestry grant scheme's application to rural areas. The strips of woodland could be of any width and contain various tree species and planting densities. They could be established by direct grant support to the landowner or to a community organisation, or local authority who had taken ownership or a tenancy of the land on which the woodland was to be established.

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.:

The existing systems for making local communities and stakeholders aware of forestry proposals seem to be satisfactory. The main problem is that too little attention is paid to the comments sent in to SF. Too often it seems that a two way dialogue between applicant and SF leads to decisions, to the exclusion of the other interests. There needs to be a better format established, such as a round table mechanism, where applicant, SF and other interests can have an open exchange of views and potentially reach agreement on the way forward. Otherwise the main outcome is usually frustration on the part of the other interests.

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.:

See answer to question 11.

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?:

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.:

See answer to question 2. The fundamental problem is explained in an email I sent to the Convener of the Cairngorms National Park in Sept 2018. The text is below. At that time the main constraint appeared to be the conditions attached to CAP payments. Essentially these conditions required the grant recipient to "do something". This was easily expressed by paying grant for the planting of defined areas, with specified species and planting density and, to try and ensure the planted trees survived, by enclosing the area with a fence, usually a deer fence. It is more difficult to provide grant aid to an area in which the management action is to prevent over grazing or loss through wild fire and where the outcome is the slow establishment of trees, often in a sporadic manner and over a long time period. But that is exactly what is required to maximise the biodiversity gains and to capture carbon in the most efficient manner, by the trees and all the rest of the vegetation. And it will produce woodland that is more resilient to disease, drought and wildfire. But there is plenty of experience in developing appropriate management agreements that deal with this sort of situation, as in other organisations, such as NatureScot/Scottish Natural Heritage and other European countries. The challenge is to get away from the mental fixation that forestry expansion equals tree planting. This attitude, combined with an excessively simplistic grant system, is completely inappropriate when today, in the uplands, we need better management of the whole ecosystem, which is not the primary purpose of the main public funders, ie Scottish Forestry. It begs the question of whether in the future the whole of the budget for SF grants in the uplands should be transferred to NatureScot who are much better placed to provide financial support for a whole ecosystem approach, through their power to make long term management agreements combined with their statutory authority for deer control.

There is also the experience gained over the last 40 plus years in the development of financial support mechanisms for environmentally sensitive farming, going back to the establishment of Environmentally Sensitive Areas in England, Scotland and Wales in the 1980s. Those schemes and their successor ones must provide enough information to develop sufficiently flexible management agreements appropriate to woodland and related situations, rather than the rigid box into which forestry grant applications have to be squeezed.

Cairngorms National Park – Forestry Strategy

[Redacted]

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?:

Effective management of deer populations will only come about when deer fencing is prohibited, except for safety reasons adjacent to public roads, and NatureScot uses its existing powers, namely section 7 AND section 8 of the Deer (Scotland) Act 1996, to control deer at a landscape scale. That requires public funding, either through SF and/or NS to employ sufficient stalkers to do the culling, with or without landowner agreement. Landowner attitudes need to change to facilitate this. King Charles could lead the way with the management of Balmoral. If he orders the deer numbers to come down many other landowners will follow his example.

Small scale mixed land use?:

Same solution as with landscape requirements - more stalkers, especially those employed within local communities.

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

Please add your comments here.:

There is a fundamental question still to be addressed - in this day and age, with carbon markets flourishing, do we actually need forestry grants? The desire of private sector interests to offset their carbon emissions, or simply to be seen to help restore the planet, is driving much of the land sales process operating today. Forestry grants seem to be just the icing on the cake. If such grants were scrapped tomorrow would it make any difference? Would corporate interests maintain their enthusiasm for buying "cheap" Scottish land and plant or regenerate woodland without generous planting grants. When Anders Polvsen started buying land in Glenfeshie and elsewhere he immediately began deer reductions to secure natural regeneration. He didn't need the temptation of forestry grants to set him on this course of action.

Of course Wildland Limited have subsequently done a lot of planting in catchments which lacked any natural woodland remnants, but more recently they appear to have received over £1million for restoring woodland through natural regeneration.

But elsewhere £millions are being wasted through the forestry grant system in paying landowners to erect deer fencing and plant rather than regenerate. One clear example of this, on the opposite side of the River Spey to Wildland's land holding, is BrewDog's Kinrara estate. Over a £1million is in the course of being paid to them to fence and plant when a fraction of this money should have been spent on reducing deer numbers and expanding the existing natural forest through regeneration, all without fencing and planting. This sorry tale is repeated time and time again across Scotland and needs to stop.

Another fundamental question is whether it is appropriate for Scottish Forestry to be both the regulator for the forestry industry and the grant supplier to the private sector. Surely there is a potential conflict of interest in such an arrangement. SEPA, for example, is not a regulator of pollution and at the same time a grant provider of pollution control equipment. A case could be made for SF's functions to be reduced to that of the regulator only, of both the state and private sector. Its grant aid function in the uplands could be transferred to NatureScot, while in the lowlands forestry grant processes could be integrated into the other agricultural grant processes, providing a simpler system and a "one stop shop" for landowners wanting financial support for both their agricultural and forestry activities.

About you

What is your name?

Name:
[Redacted]

What is your email address?

Email:
[Redacted]

Are you responding as an individual or an organisation?

Individual

What is your organisation?

Organisation:

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

Publish response with 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.

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