

## Response to FCS “Discussion Paper on New Planting in Scotland”

### Forestry Policy Group

We support woodland expansion and consider the 25% forest cover target as appropriate. We also broadly agree with types of land which are put forward as potential candidates for future expansion.

However Forestry Policy Group considers that the consultation paper would have been far better founded if it had:

- begun with a thorough analysis of the compositions *current forest resource*;
- analysed whether the current resource was fit for purpose in the 21<sup>st</sup> century;
- identified its strengths and weaknesses;
- and on the basis of this analysis, considered how forest expansion could contribute to strengthening the provision of benefits from the forest resource as a whole.

We note that the only place in which the consultation paper adopts this approach is under softwood production, where it identifies the problem of sustaining constant future levels of timber production from the current resource. If a similar approach had been taken to other economic benefits (e.g. hardwood production, biomass), environmental and social/community benefits, we would be in a better position to consider what form future expansion might take. For example, it would be possible to make some broad assumptions about what constitutes acceptable provision of local woodlands for both rural and urban communities, see how the current resource matches this and from this derive some aspirations for the scale, location and type of woodland expansion.

The Forest Policy Group’s view of the current resource is that the legacy of woodland establishment from the 20<sup>th</sup> century has left us with a “skewed” resource in which:

- Softwood production is still too dominant and that this leads to underprovision of all other benefits. Furthermore the location of this resource also requires long distance haulage of softwood round timber to large scale processing centres, with attendant high carbon costs and depressed rural employment opportunities.
- Quality hardwood timber production is far too low.
- The representation of durable softwood species suitable for local processing and niche markets and i.e. larch and Douglas fir is far too low.
- Forests are generally located too far from urban populations; and too many of the forests close to rural populations are not suitable for local use.
- There are far too few large scale “native forests” and landscape scale restoration of forests, as has been carried out in the Cairngorms and Beaully catchments, need to be extended to all other parts of Scotland.

Forest Policy Group - whilst recognising the current political realities – considers that past experience shows clearly that mistakes are made when forest policy focuses too closely on one policy objective. We feel that there is a danger of this happening at present, with the strong focus on climate change. In recent years forestry has adopted

a far more holistic view of benefits and woodland types than in the past and any attempt to change this would be misguided

The Forest Policy Groups view is that the over-riding need for the foreseeable future is to continue to diversify the forest resource and to attempt to target certain woodland types to specific types of location. To this end we urge that woodland expansion should aim to increase the proportion of the following woodland types:

1. woodland comprising quality hardwoods
2. conifer woodland with a high proportion of larch, Douglas fir and Scots pine;
3. woodlands located in a way that strengthens local utilisation of timber and reduces in the long term haulage of round timber. This generally equates with the types of woodland described under 1 and 2 above being located reasonably close to centres of population, both large and small, throughout Scotland.
4. multi-functional native woodlands, in which emphasis is placed on economic as well as social and environmental benefits;
5. naturally regenerated semi-natural woodland at a scale which leads beyond habitat networks, to landscape scale restoration

We consider that future expansion of spruce plantations should take place, but only at a rate which sees significant diversification of the overall forest resource, and in a way that produces higher quality more versatile timber.

#### **Some specific points relating to the Consultation Paper**

***Carbon footprint:*** We think that more consideration should be given to the carbon costs associated with forest management and timber utilisation; and approaches to management regime and timber utilisation should be adopted that minimise carbon costs. This suggests more natural regeneration and species selection that provides timber more suitable for local processing.

***Short rotation coppice:*** We understood that it was now acknowledged that short rotation coppice is unlikely to occur on any substantial scale in Scotland. Perhaps it should therefore be dropped from documents such as this.

***Timber production in a Scottish context:*** We note that the paper switches to UK figures for the coverage of softwood timber production.. Scotland already has a disproportionate share of the plantations that produce softwood. Use of a figure that gives Scotland's production and consumption would be more useful and would lead to adoption of policies which are better tailored to Scotland's needs.

***Regional clustering:*** The concept of regional clustering is being recognised as a appropriate model for the development of the bioenergy sector in Scotland. In a high transport cost future, it is a model that is also needs to be adopted more widely in timber utilisation.

***Mixed woodlands:*** In our experience, almost all urban, community and farm woodland occupiers will opt for native woodlands when the case is made. The "desired function" argument advanced here is weak and should not be pursued.

**Land use types for woodland creation:** The table showing “very indicative links between land use and woodland types” suggests native woodlands are best placed on “shrub heath”. This approach continues to perpetuate an unfortunate “ghetto-ised” view of native woodlands, as being solely for nature conservation; when they are capable of producing much wider benefits.