Questions

1 FLS Corporate Structure

1 - To what extent do you agree that the Corporate Plan provides a good introduction to the organisation and structure of Forestry and Land Scotland?:

Disagree strongly

Please use this space to comment further:

We do not agree that the draft Corporate Plan provides a good introduction to the organisation and structure of Forestry and Land Scotland (FLS).

Text on p6 says “There are five regions, each of which has a high degree of responsibility for delivery through a network of local offices as illustrated below”, however whilst the map on p7 identifies the five regions and the distribution of the estate, it does not show the location of offices.

Section 3.1 of the draft Plan names the five “functional areas”, but does not describe their activities, or distinguish between Corporate Services and Business Services, or Land Management and Estate Development; it’s difficult to see how anyone unfamiliar with the organisation could derive any meaningful understanding of FLS’s structure from this.

The Corporate Plan should list the main responsibilities of each functional area. In the interests of transparency the Plan should indicate the approximate staffing level and operational budget of each functional area, and commit that this information will be reported in FLS’s annual report and accounts.

The Plan should also provide more information on the identity and remit of the non-executives (or provide a link to this information on the FLS website).

2 FLS vision and mission

2 - To what extent do you agree with the FLS Vision and FLS Mission contained in the Corporate Plan?:

Disagree slightly

Please use this space to comment further:

The wording of both the vision and mission gives the impression that FLS’s role is to look after all of Scotland’s forests and land: they would be better phrased “National forests and land that Scotland can be proud of” and “To look after Scotland’s national forests and land, for the benefit of all, now and for the future.”

3 Outcome 1: Supporting a sustainable rural economy

3 - To what extent do you agree with the following Outcome: By 2022: FLS supports a sustainable rural economy by managing the national forests and land in a way that encourages business growth, development opportunities, jobs and investments?:

Agree strongly

3 - To what extent do you agree the actions for delivery will be sufficient to deliver this Outcome?:

Disagree slightly

Please use this space to comment further:

Forestry can and should make a major contribution to developing and supporting a sustainable rural economy and as the manager of 9% of Scotland’s land area, Forestry and Land Scotland has an important role to play.

National forest and land already contributes to the rural economy in a number of ways but there is substantial scope for growth and diversification beyond the narrow focus on timber supply to a small number of downstream processors. The figures for GVA and jobs quoted in section 3 may seem impressive but are inflated by the multipliers used in the research methodology; a significant proportion of those counted have no awareness that they are part of the forest industry, whilst many others (e.g. in timber mills) are not “rural”.

There is a need to unpack and address the contradictions inherent in the SFS priority: “Improving efficiency and productivity, and developing markets”. Over recent decades ‘efficiency and productivity’ have been understood in a very limited way; how cheaply can timber be delivered to processors; how much timber can be produced per job. The effect of this is to minimise forestry’s overall contribution to the rural economy. “Efficiency and productivity” should be understood and assessed in terms of how to most efficiently use all of the timber and land to deliver public benefits and how to increase the productivity of the estate in terms of supporting the rural economy.

A new approach is needed to enhance forestry’s contribution. Part of this change in approach should be a fresh look at the way in which FLS allocates contracts for work on the national forest estate. The use of Framework Contracts (and the levels of bureaucracy required) can act as a barrier to entry to small scale enterprises, and FLS should be encouraged to show leadership in finding ways of overcoming these barriers to rural businesses working on the public estate.

The ongoing and day to day actions include:

• Supporting commercial activity on the national forests and land including agricultural management, rural housing and renewable energy opportunities, all of which help to sustain rural communities.
• Work proactively with our tenants and stakeholders to identify potential added-value opportunities.
Whilst these are welcome the phrasing is vague and they could be more explicit in saying that FLS will work with communities and local businesses to identify and overcome barriers and to support the development of a sustainable local rural economy.

We welcome the key actions
• Development and implementation of a Timber Access Strategy
• Development and implementation of a Timber Marketing Strategy

FES’s marketing strategy of locking up much of the timber harvest in long term contracts, often at a discount to market value, has caused significant financial loss, weakened management control of forests by local staff and inhibited market development.

It must be recognised that long term contracts provide significant competitive advantage to holders and this should be incorporated in the pricing: any future long term contracts should be signed at a significant premium, and collectively these contracts should cover a smaller proportion of the annual harvest.

It has long been recognised that the forest industry lacks good quality inventoriable data, which has hampered the development of more accurate yield models. Modern harvesting machinery collects such data – it should be a condition in all new harvesting contracts that this information is passed to FLS.

We welcome the key action
• The review and implementation of a refreshed New Woodland Investment Programme, to deliver strategic objectives on new planting and repositioning of the national forests and land (through acquisition and disposals)

We look forward to this review and trust that there will be an opportunity for stakeholder input, particularly with respect to the identification of sites for disposal or the development of a process for such identification. Selection of sites for disposal for any future privatisation programme should move away from a negative sift (i.e. which bits of the estate does FLS want least) and take a genuinely strategic view of how best to deliver the Scottish Forestry Strategy.

The review should also be used to increase opportunities to progress land reform and release land locally. In particular FLS could consider creating woodland crofts for sale or lease to individuals and releasing land to appropriate NGOs for the creation of woodland crofts.

There should be greater consideration of what happens to assets sold into the private sector. Relatively small proportions of the land sold since 2005 have been acquired by community bodies and environmental bodies through the National Forest Land Scheme and now CATS; these purchasers were required to lay out their plans for future management. However no such commitments were required of private sector purchasers and there is a need to understand what has happened since disposal: e.g. what proportion is managed to UKFS and/or is now covered by an approved management plan.

We note that the Forestry and Land Management (Scotland) Act 2018 says:
2 (1) The Scottish Ministers must promote sustainable forest management.
3 (1) (b) The forestry strategy must set out the Scottish Ministers’ objectives, priorities and policies with respect to the promotion of sustainable forest management.
6 (e) The Scottish Ministers must have regard to the forestry strategy when disposing of forested land under section 20(1) and that the duty to promote sustainable management is not confined to national forests and land. We therefore consider that the legislation requires Scottish Ministers to consider SFM throughout the disposal process – not just in selecting land for disposal – and that all buyers of land and other assets be required to outline their future plans and (where acquiring woodland >10ha) commit to production of a Scottish Forestry approved management plan / long-term forest plan for 20 years.

We support the “ongoing and day-to-day actions” but a number of these need to be delivered proactively: e.g. FLS inherits a very substantial backlog of restocking which should be addressed as a matter of urgency.

4 Outcome 2: Looking after Scotland’s national forests and land

4 - To what extent do you agree with the following Outcome: By 2022: Scotland’s national forests and land are looked after; biodiversity is protected and enhanced and more environmental services are provided to people?:
Agree strongly

4 - To what extent do you agree the actions for delivery will be sufficient to deliver this Outcome?:
Agree slightly

Please use this space to comment further: :
We agree with the principle but question the wording: “Scotland’s national forests and land are looked after” which seems rather weak.

As with the previous outcome, the scale and extent of the national forests and land gives FLS a key role, environmentally, however the claim that “the scale of our national forests and land allows us to manage whole landscapes” is misleading, and gives the impression that FLS can work “in a bubble” without reference to the outside world. In practice there are always other landholdings and a need to work in partnership.

FLS sets great store by Sustainable Forest Management, but SFM is not in itself a guarantor of positive environmental outcomes: the UKFS and UKWAS are more aimed at limiting and mitigating environmental damage from the pursuit of economic objectives. In particular the facility within UKWAS to allocate compliance (whereby key environmental measures have to be achieved in aggregate across the landholding, but not necessarily within each forest unit) allows the estate to maintain its certification even when many individual forest blocks do not meet the requirements of the standard.

There are broader questions around the use of the word “sustainable”: timber harvesting and transport in modern forestry is dependent on fossil fuels – heavily subsidised for in-forest use – it is unlikely that this practice is defensible for long in the context of the climate emergency declared by the First Minister.
The Scottish Government’s response to climate change has to date been largely focussed on woodland creation, but there is limited scope for this within the existing FLS landholding and there are important questions to be asked around the cost effectiveness of acquiring and establishing new woodland.

However, mitigating climate change is not just about woodland creation and timber use; management of soil carbon stocks is increasingly being seen as a critical component. Whilst soil carbon fluxes are not yet fully understood it is clear that that ground preparation (at restock as well as initial establishment) and disturbance at harvesting cause emissions, and that where disturbance is inappropriate and excessive, particularly on organic soils, this can be at a sufficient scale to undermine sequestration claims.

FLS should show leadership and demonstrate best practice by adapting and developing silvicultural practices to move away from clearfell wherever possible and minimise carbon losses during establishment and restocking.

5 Outcome 3: National forests and land for visitors and communities

5 - To what extent do you agree with the following Outcome: By 2022: everyone can visit and enjoy Scotland’s national forests and land to connect with nature, have fun, benefit their health and wellbeing and have the opportunity to engage in our community decision making?:

Agree strongly

5 - To what extent do you agree the actions for delivery will be sufficient to deliver this Outcome?:

Agree slightly

Please use this space to comment further.:

The ability to deliver social outcomes is a key rationale for the existence of the national forest estate, it is an area where some important progress has been made over the past decades but there is scope to do more. We are very pleased to see the commitment to develop a Communities Strategy and trust there will be opportunities for stakeholder involvement.

As the draft plan notes there are a wide range of options and models for greater involvement: some work well but not all function effectively: notably the process of public consultation on Land Management Plans often operates as a tick-box exercise for UKWAS certification, whilst in recent years community partnerships operating through management agreements have been under-resourced and of limited effectiveness.

Delivering this outcome requires a commitment to on-going cultural change within FLS. Our experience of supporting community groups working with FES/FLS or seeking to use the NFLS/CATS is that levels of understanding of and commitment to the community agenda vary significantly across the organisation; between regions, and also between functions. Many aspects of the CATS process, notably the promotion and central administration of the scheme, are functioning well however it is apparent that some parts of FLS are more helpful / less obstructive than others.

We note that there is an ongoing action re “maintaining walking and biking trails” - a significant number of trails have been effectively decommissioned in recent years, which seems to conflict with this action.

We believe there is a significant opportunity to make much more effective use of IT in the promotion and marketing of the estate.

6 Outcome 4: A supportive, safe and inclusive organisation

6 - To what extent do you agree with the following Outcome: By 2022: FLS is a supportive, safe and inclusive organisation that provides exciting careers, professional development and strives to be an employer of choice?:

Agree strongly

6 - To what extent do you agree the actions for delivery will be sufficient to deliver this Outcome?:

Agree slightly

Please use this space to comment further.:

We agree that FLS should be a “supportive, safe and inclusive organisation” and that the establishment of the new agency is an opportunity to deliver on this, but doing so will require substantive culture change. Although FES has evolved considerably the perceived primacy of timber harvesting has allowed the persistence of a “boys with toys” mentality in some areas which mitigates against inclusivity.

We support the objective to eliminate avoidable work accidents but it is critical that FLS’s health and safety culture is empowering, and does not become a pretext for inhibiting or preventing partnership working and other third party activity on national forests and land. There is a need to recognise that FLS’s mechanisms and processes for managing H&S are not the only possible or legitimate mechanisms.

The corporate plan needs a key action to improve and upgrade IT systems and equipment, particularly to facilitate in-forest connectivity with systems. FCS/FES has fallen well behind the private sector in recent years in this respect. Enhanced IT would increase both operational efficiency and the attractiveness of the job, helping retention of skilled staff.

The Plan should acknowledge that past practices (remote management, functional silos, poor IT) mean that FLS inherits increasingly poor understanding of the forest estate it manages: if FLS doesn’t know what’s in the forest (and our experience is that the information provided to communities using NFLS / CATS is often very poor) then it makes planning for more complex silviculture and developing resilience more difficult and undermines the claim to deliver Sustainable Forest Management. There should be an action to improve the quality of inventory information and estate mapping.

It is notable that the reduction of FLS’s “resource consumption and waste footprint” is the last ongoing and day to day action under this outcome – this action deserves a higher profile.
7 Outcome 5: A high performing organisation

7 - To what extent do you agree with the following Outcome: By 2022: FLS is recognised as a high performing, efficient and effective, financially sustainable organisation that continues to transform and adapt?:

Disagree slightly

7 - To what extent do you agree the actions for delivery will be sufficient to deliver this Outcome?:

Disagree slightly

Please use this space to comment further.: We agree that FLS should be “a high performing, efficient and effective, financially sustainable organisation” but are unclear as to whether this needs to be a separate outcome. These objectives might perhaps be taken as read: if they do need stating explicitly rather than being seen as standard practice (as the draft plan notes “all public bodies in Scotland have a duty to deliver best value based on sound governance, good management, public reporting on performance and a focus on improvement”) then perhaps they should be incorporated with the previous outcome.

We are concerned that, for example, “developing lots of strategies to meet Scottish Government policy requirements” sounds like a recipe for a top-heavy organisation focussed on internal processes and telling a good story to Ministers, rather than actually delivering for the Scottish people.

We are not convinced that this proposed outcomes links to the SFS priority “improving efficiency and productivity and developing markets”, which is concerned with “encouraging the development and expansion of markets (including wood fibre products and forest-based recreation and tourism), and promoting efficiency, safety and productivity improvements throughout the wood fibre supply chain” i.e. actions which are covered by previous outcomes.

We think it would be helpful to unpack what “financially sustainable” means in the context of Forestry and Land Scotland. Historically FES has operated on the basis that the forest management side of the organisation should at least break even, whilst “additional” social and environmental outcomes were funded by grant from the Scottish Government. We support this model, however much greater accountability and transparency is required around how these SG grants are spent, to demonstrate value for money and ensure that they are not cross-subsidising timber harvesting.

The table in section 10 is unhelpful: the figures presented are gross and it’s difficult to get a sense of how the income and expenditure figures interact: in particular, what are the costs involved in producing timber income of £74m? We understand that this opacity derives in part from the internal accounting systems inherited from FES which do not facilitate effective management understanding of the organisation’s finances: this should be addressed as a matter of urgency.

We note also that FES annual accounts show very large reserves being carried forward (£37.8M at 31 March 2018), at the same time as lack of resources is cited as the reason for reduced community engagement effort, the on-going backlog of restocking and the decommissioning of trails. Whilst the ability to carry forward reserves is an invaluable mechanism for FLS given the volatility of timber income we do not consider this level of reserves to be necessary, especially when other aspects of FLS’s work are starved of investment and there is the ongoing risk that the reserves will be siphoned off to deliver Scottish Government objectives outwith the FLS estate.

8 Overview of the outcomes

8 - To what extent do you agree the Corporate Plan provides a sufficient strategic overview of the types of work we will deliver over the next three years?:

Disagree strongly

Please use this space to comment further on the coverage of the outcomes.: The draft plan includes an extensive list of actions, however there is little to give a sense of resource allocation to these actions, and without this it is difficult to agree that it provides a sufficient strategic overview of FLS’s plans.

We disagree strongly with the statement in chapter 7 that “not all of our outcomes can be delivered across all of our regions”.

Whilst there will inevitably be individual forest blocks where not all objectives can be delivered, and there may be a regional “flavour” to the mix of outcomes (e.g. Central Scotland might be expected to have a stronger focus on some social benefits), broadly speaking FLS should seek to deliver economic, environmental and social outcomes across the estate. Furthermore, the implication of the statement is that there are regions where FLS would not seek to be “a supportive, safe and inclusive organisation” or “a high performing organisation” – surely not what was intended.

We understand that the map on p25 is intended to illustrate diversity of activity, and that the points identified (many of which are not forested or part of the estate) are not intended to correspond with specific FLS holdings, however it is not helpful in this respect and may reinforce the impression that particular outcomes will be delivered in specific regions, rather than nationally.

We note that the draft plan states “we will ensure that we target investments – of staff time and effort as well as finances – on the basis of in-depth spatial analysis, so that corporate commitments are taken forward in the places where they will make most difference”. Whilst we agree that investments should be directed to where they have the greatest impact, it is important that the analysis which informs the targeting is undertaken with external stakeholder input and a “look over the fence” at developments outwith the FLS estate to optimised overall delivery of SFS objectives – this has not always been the case in the past and has led to misplaced investment and duplication of effort.

9 Diversity and inclusion

Are there any key issues or opportunities we should consider to make sure that the Corporate Plan works for different equality groups or for people from different socio-economic backgrounds?:

As noted previously the evolution of corporate culture towards a more inclusive and genuinely multi-functional organisation will be welcome and will support the diversity and inclusion agenda.
Do you think any of the outcomes or actions in the Corporate Plan will impact differently on people who share protected characteristics? (for example, in relation to their age, disability, gender, pregnancy/maternity, marital status, gender identity, sexual orientation, race, religion or belief).

As is widely recognised, the distribution of the national forests and land does not correlate well with the distribution of Scotland’s population, and that of some protected characteristics groups in particular. The extent to which this can be addressed by repositioning is limited in the short to medium term.

We agree that it is important that all of Scotland’s people, including those who share protected characteristics, benefit from and have the opportunity to access Scotland’s forests, however it does not necessarily follow that these benefits and this access must be provided by FLS.

As per our comments re targeting above, any decisions on investment by FLS to address perceived imbalances of access needs to fully consider the role of (and existing and potential delivery by) other forest and woodland owners: community, private or other public bodies, and whether support of these landowners to deliver these outcomes might be a more effective use of resources.

10 Final comments

Please use this space to provide any other comments you think are relevant to the Corporate Plan.:

It is unclear why a 3-year time frame has been chosen for the corporate plan – it does not align with either the electoral cycle or the Scottish Government’s 5 year timescale for developing a revised rural policy following Brexit; this should be clarified.

Deer impacts are a huge issue for many FLS land management objectives. The Corporate Plan should unambiguously highlight the breadth of these impacts and the difficulties of managing them with high deer populations and in the existing deer management framework.

There’s an ‘implementation gap’ - the draft Plan says very little about how the organisation will deliver the objectives it sets for itself, has no performance indicators available for consultation and no indication of how stakeholders will be involved in the organisation's work.

About you

What is your name?

Name: Jon Hollingdale

What is your email address?

Email: jon@communitywoods.org

Are you responding as an individual or an organisation?

Organisation

Organisation: Community Woodlands Association

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

Publish response only (without 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

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?:

Very satisfied

Please enter comments here.:

Very pleased that this consultation (unlike many) gave adequate opportunity for respondents to explain their answers, rather than constraining responses to closed yes/no type options.

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.: