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Submitted to Forestry and wood processing sector plan
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Introduction

1 What is your name?

Name (optional):
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2 What is your email address?

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3 What is your interest in the Forestry and wood processing sector plan?

Answer:
The Community Woodlands Association represents Scotland's 200 community woodland groups.

Forestry and wood processing sector plan

4 We outline four key points within our vision for the Forestry and wood processing sector plan. In your opinion, do you agree with our vision and level of ambition?

Disagree

Do you have any comments on the scope of the plan?:
The CWA welcomes the opportunity to respond to SEPA's consultation on its Forestry and Wood Processing sector plan. CWA was established in 2003 as the representative body for Scotland’s 200 community groups who collectively own or manage tens of thousands of hectares of woodlands and other habitats, delivering a very wide range of social and economic benefits for their local communities and the nation.

We are pleased to see a Scottish Government agency apparently responsive to the climate emergency and we are entirely supportive of efforts to ensure compliance with (and where possible to exceed) regulatory standards, however we are unclear as to the extent to which this draft strategy signals a move away from SEPA’s role as currently defined, focussed on compliance with specific legislative requirements, into a much broader engagement with forestry’s environmental impacts. Thus, section 5 tabulates a wide range of environmental risks and impacts from the sector; however, many of the actions appear to take a business as usual line, with very little information on how SEPA might actually mitigate most of the environmental risks and impacts identified.

It’s fundamentally unclear as to what issues this sector plan is intended to tackle (over and above the on-going need for operators to comply with environmental legislation) as it frequently appears to take the industry’s assertions of sustainability at face value. We note that the document states that “In 2015, Scottish forestry contributed almost £1 billion gross value added (GVA) to the economy and employed over 25,000 full time employees.” The study quoted actually concluded that direct employment in Scottish forestry was ~12,000 FTE, with the remaining 13,000 jobs being indirect and induced employment estimated using employment multipliers or representing forestry’s contribution to tourism.

We have a number of specific concerns about the impact of any extension of scope or increased regulation on our members:

• clarity of approach: the SG regulatory landscape is very cluttered, with a plethora of agencies and departments asserting their regulatory roles. Negotiating the gauntlet of often contradictory advice and instruction from SG agencies (which supposedly are all focused on delivering the SG’s priorities) can be a considerable headache for community groups, especially those which are primarily volunteer-led.
• innovation and new regulation: our members are often seeking to use their woodlands in innovative ways to facilitate sustainable development, our experience is that regulators, especially those from outside the sector, tend to be more comfortable with historic practice, however unsustainable, and struggle to see the “big picture” when innovative and sustainable projects are presented to them. This mindset will not facilitate the changes required to deliver One Planet Prosperity.
• scale and new regulation: our concern is that, in our experience, new regulatory proposals are usually accompanied by a disproportionate bureaucratic burden on small operators. Scottish forestry has become very centralised and dominated by a few big operators - indeed the need to support smaller scale business is recognised as a priority in the new Scottish Forestry Strategy – additional regulation that places a disproportionate burden on small (and community) scale businesses will only exacerbate this.

We do not agree with the vision. At 94 words it is far too long and is less a vision than a listing of four bland aims. Fundamentally it has no stretch: two of the elements are about continuity of current practice (although there are many who might question whether the industry is as resilient and sustainable as claimed), one is about “encouraging consumers” and one is about partnership working.

If you’re going to have a vision then be visionary. Be clear as to what’s wrong with the status quo and then whether SEPA is going to do anything meaningful about it. If you believe that Scotland already has “a resilient, sustainable forestry and wood processing sector that delivers environmental, social and economic success to Scotland’s people and businesses” and is “valued nationally for its expanding contribution to reducing the effects of climate change and contributing to a low carbon, circular economy” it begs the question as what this sector plan is for and what it seeks to achieve. Everyone agrees that “strong and effective partnership working” is a good thing and that consumers should be “encouraged to choose locally sourced products” but it’s difficult to see that SEPA has any particular remit or leadership role in these areas.
5 Do you think the plan captures the main environmental risks and impacts of the sector, as outlined in Figure 7?

Disagree

Are there any other environmental risks and impacts that should be included?:
The list captures most of the main environmental risks and impacts, although we suggest some additional items below. A much more significant issue for the strategy is that whilst this may be a great list there’s absolutely no clarity about what SEPA (or anybody else) is going to do to tackle or mitigate most of the items on it.

A significant number of the impacts identified are consequences of and exacerbated by the dominant model of forestry in Scotland, which whilst meeting, more or less, the minimum standards set by the UKFS, has a number of characteristics which can have significant negative environmental consequences:

- Prevalence of exotic conifer monocultures, managed under no-thin silvicultural regimes;
- Dominance of clearfelling in large coupes, with resulting prevalence of clearfell harvesters. There is limited equipment or operator skills for more environmentally sympathetic low-impact silvicultural systems: when thinning is done it is often with inappropriate machinery / inadequately trained operators;
- Relatively poor recovery rates from harvesting sites (inhibits restock, necessitates additional ground prep, reduces climate change impact);
- Reliance on (subsidised) diesel use in the forest;
- Relatively few, large, timber processors, resulting in high timber miles;
- Significant in-forest carbon footprint from ground disturbance during ground preparation (woodland creation and harvesting/restocking), roading etc.

We agree that these are issues which need to be addressed, however SEPA’s role is unclear: the primary routes for influencing and driving change are the UKFS and SFS and a future equivalent of the Forestry Grant Scheme to provide financial incentives where appropriate.

Three further items that should be included are as follows:

- Deer
  The most important omission from the list is deer, which are responsible for significant CH4 emissions, perhaps equivalent to 0.5% of Scotland’s net man-made GHG emissions (conventionally deer don’t get included in GHG inventories because of the rather bogus argument that they are “natural”, but that doesn’t mean the methane isn’t emitted, or that reducing deer numbers wouldn’t have a real impact on climate change) as well as damage to native woodlands and other habitats, and the environmental cost of control.

  The deer problem is not confined to forestry: arguably the root causes with respect to red deer are in open habitats where deer numbers are maintained at an unsustainable level. However, they are a considerable obstacle to better silviculture (or wider species choice): foresters, especially those attempting to move beyond the standard sitka model, are expected to fence other people’s deer out – there is no expectation on those who want unsustainable deer numbers to fence them in (let alone manage their deer herds responsibly).

- Weevil
  Weevil damage to young trees has a range of environmental impacts, potentially causing considerable losses at restocking, delaying successful establishment of restock and having knock-on effect on carbon sequestration. With the removal of permission for permethrin the primary chemical treatment is acetamiprid (a neo-nicotinoid) which raises other issues. There is an urgent need for effective alternative strategies.

Species choice
Scottish forestry has become over-reliant on one exotic species, which has limited biodiversity value. We are not opposed to sitka spruce per se: we recognise the economic and environmental (climate/soil and unpalatability to deer) factors that drive its dominance, but the over-concentration on one species incurs obvious risks for resilience.

6 Have we identified all the main partners and influences for this sector in order to achieve the vision, as outlined in Figure 8?

Disagree

Are there other influences that you think should be included?:
This is a slightly curious typology: we are not sure that Crown Estate Scotland qualifies as a government agency or regulator, or why Scottish Enterprise is included but not HIE (or the new South of Scotland enterprise agency). We would also question the extent of influence of the Natural Capital Initiative.

Landowners and managers are not listed although they are key influencers of on-the-ground operator practice, particularly in terms of moving beyond compliance – what they are willing to accept in terms of harvesting site condition, etc. Our experience is that where land owners and managers (whether private sector or community sector) are fully engaged with silviculture, very high operator standards can be achieved, but this is not, unfortunately, generally the case. FLS, whilst a government agency, is the largest forest land manager, and could have a very significant role to play in driving up contractor standards (if it was interested in so doing).

Please tell us about any relationships you have with any of the influences that we might be able to use to help implement the sector plan?:

7 Have we identified all the actions we should take to solve compliance issues in the sector?

Disagree

Are there other actions that you think we should be taking to improve compliance?:
Section 6 says “We will help responsible compliant businesses to operate by making it significantly harder and more expensive for those who persistently fail to comply with environmental regulation to operate. We will achieve this by increasing scrutiny, prescription, fees and the use of enforcement and monetary penalties for those who fail to comply.” But this apparent threat of the big stick is not reflected in the proposed actions in section 7 “We will engage with senior management at processing sites to help businesses recognise the value of improved compliance and community engagement.”
Too many actions are unclear / weak and do not indicate a direction of travel: “we will work in partnership with SF and SG to review the diffuse pollution GBRs and guidance that relate to forestry activities” but it’s not clear whether this is with a view to strengthening or weakening the guidelines. Others appear to be business as usual e.g. “identify opportunities to engage regularly with Confor and private sector companies”.

We note that three of the actions involve discussion with other Scottish Government agencies: this should be standard practice when all are supposed to work together as part of Team Scotland delivering the Government’s national outcomes. It’s also unclear how e.g. working “with Scottish Forestry to update our memorandum of understanding protocol to reflect recent government forestry organisational changes and the content of the Scotland’s Forestry Strategy” will contribute to tackling non-compliance.

8 Have we identified the correct opportunities we could take to help businesses to go beyond compliance?

Disagree

Please tell us about any other opportunities that you think could be included to help businesses in this sector to move beyond compliance:

Whilst the actions proposed is this section are generally laudable, too many are vague and essentially non-committal, and it’s unclear what SEPA’s role might be in delivering them. For example: what does SEPA actually intend to do to “work across the supply chain to minimise transport and associated noise, fuel use and emissions”. Will SEPA be supporting the establishment mobile or small scale sawmills closer to forests, or to developing hydrogen fuelled timber lorries?

9 Do you think the actions are ambitious enough?

Disagree

Which of the actions and aspirations proposed in this plan do you consider to be of the highest priority?:

We do not think that these ambitions are very ambitious, and certainly do not justify the rhetoric of progressing “powerful actions that contribute towards achieving our One Planet Prosperity goal for Scotland”.

There are three “actions” under the heading of “Protected Communities”, none of which seem to have any significant relevance to protecting communities (from whom or what?), e.g. “We will update our memorandum of understanding with Scottish Forestry to reflect recent government department changes as set out within the Forest and Land Management (Scotland) Act 2018 and the Scottish Forestry Strategy, to clarify roles and responsibilities in achieving environmental compliance” – we would’ve thought this a technical matter between Scottish Government agencies which would be done as a matter of course.

10 Do you have any other comments?

Please tell us any other comments you have here.:

Whilst public consultation on the strategies of Scottish Government agencies is always welcome, this one is very poorly constructed. In particular it fails to explain why the strategy is needed at all and there is a disconnect between the broader environmental impacts of the forestry sector and SEPA’s role and proposed activities.

We do agree that there is much the forestry sector could do to reduce negative impacts, beyond compliance with environmental legislation, however there is little here to suggest that SEPA has the remit or expertise to lead this work; indeed it seems rather too eager to accept the industry’s declarations of sustainability.

Finally, we note that the questions in the online response system are not all the same as those in the consultation document; this doesn’t seem like very good practice.