

## Response to Defra Consultation on Environmental Targets

### About the Institute

The Institute of Chartered Foresters is the Royal Chartered body for tree professionals in the UK. Its membership covers the full range of tree professionals, and this range of expertise is one of its greatest strengths. It has 2,000 members who practise forestry, arboriculture and other related disciplines in the private and third sectors, central and local government, research institutions, universities and colleges throughout the UK. The Institute regulates standards of entry to the profession. It provides support to members, guidance to professionals in other sectors, information to the general public, and educational advice and training to students and tree professionals seeking to develop their careers.

In spring 2022 the Institute convened a cross-sector group to discuss proposals in the Nature Recovery Green Paper and the environmental targets consultation. This group included practitioners, sector leaders and policy experts from Confor, Woodland Trust, Small Woods Association, CLA, private consultancy and more. There is significant agreement across the forestry sector about key issues, and appetite to support policymakers develop informed interventions that work for the environment, the sector and the economy.

Our diverse membership is our greatest strength, and we have members working across the spectrum of forestry interests. This response has been informed by our members, but also by our mission to be a balanced and impartial voice, representing professional forestry and upholding its values of high standards, evidence-based decision making and social and environmental responsibility.

### Our Response

We welcome the opportunity this target-setting exercise presents to set a clear purpose for our environmental ambitions, as per the Environment Act 2021, and appreciate the chance to feed in.

The choice of a particular target is largely political. This month's published tree planting statistics are not encouraging reading as we have again failed to achieve the target that we set for ourselves. We acknowledge that it is important to have something to work towards, but as a professional body we are more focussed on how to achieve it and the barriers to doing so. This is what we focussed on with the Office for Environmental Protection when we were interviewed for their response to this consultation. The main barrier as we see it is the critical skills shortage, which in turn threatens standards. We dispute the assertion in the evidence pack for woodland targets that the forestry sector capacity is being appropriately addressed, as detailed in our position paper on the skills crisis<sup>1</sup>.

While there is some good evidence and thinking in the consultation, overall there is a lack of detail and some oversimplification, limited mention of delivery mechanisms, notably funding, and when viewed together the targets lack coherence.

By now we should all understand the importance of addressing the nature crisis in parallel with the

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<sup>1</sup> <https://www.charteredforesters.org/forestry-skills-crisis-puts-climate-targets-at-risk>

climate crisis – they cannot be tackled separately and any interventions for one relate to the other. The target-setting exercise clearly recognises the value of trees for habitat but does not acknowledge the contribution that can be made by all kinds of woodlands, including productive conifer woodlands which can provide valuable habitat. When well-designed plantations are silviculturally managed, structural changes to benefit biodiversity can be created and species blended over time.

Crucially, while this consultation may be focussed on nature, it cannot be ignorant of society's critical need for timber and wood products. We need a clear connection to sustainable timber production for use in a low-carbon society. Without this connection there is a risk that our timber production needs are simply off shored, our progress towards wood security is impeded and we miss out on the associated environmental benefits of transitioning away from greenhouse gas heavy products. The UK Committee on Climate Change is very clear that we need to replace carbon-heavy materials like concrete in construction<sup>2</sup>, and this cannot happen if the economic driver to grow timber is not there. Achieving net zero will also help us achieve nature recovery.

We have responded to selected questions below.

## Questions

### Long-term wider habitats target

***Do you agree or disagree with the level of ambition of 'in excess of 500,000 hectares' proposed for the long-term wider habitats target?***

The Institute supports the level of ambition but queries how this relates to the woodland target.

We strongly disagree with the definition of 'wildlife-rich' habitats as including solely native woodland. The consultation states that "'Wildlife-rich' habitats are habitats that have value for biodiversity"; all woods that are UKFS-compliant – that is, planned and managed according to sustainable, modern forestry practices to balance environmental, economic and social needs – support biodiversity<sup>3</sup>.

There is a lot of misinformation among the general public and the media, often propagated by unhelpfully polarised debate among politicians, civil servants and professionals about the relative value of different types of woodland, as if it is a zero-sum game. The key is for woodland to be well managed, and we are missing a huge opportunity to deliver for nature when we neglect to bring thousands of hectares of unmanaged woodland into management – the 41% of existing woodland in England not actively managed is a failure for nature, climate and the economy<sup>4</sup>. We also neglect the huge biodiversity value of mixed species productive woodland.

***Do you agree or disagree that all wildlife-rich habitat types should count towards the target?***

We agree, which is why it should include non-native woodland. The question offers options to remove listed habitats like scrub, heathland or arable field margins, but not to add any. We recognise the challenge discussed in the evidence pack that this requires different types of woodland to be defined, but it would be short-sighted and misleading to exclude it without evidence for doing so when it can enable us to deliver so much more for nature and climate.

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<sup>2</sup> <https://www.theccc.org.uk/publication/sixth-carbon-budget>

<sup>3</sup> <https://www.confor.org.uk/media/247794/confor-biodiversity-forestry-report.pdf>

<sup>4</sup> <https://rfs.org.uk/wp-content/uploads/2021/03/woodland-management-missed-opportunities.pdf>



## **Target proposals for woodland cover**

### ***Do you agree or disagree with the proposed metric for a tree and woodland cover target?***

While we don't have strong objections, there are a few considerations to note.

It is helpful to use a percentage of land area rather than hectares per year. Given the change in approach, it is important the metric aligns with international and cross-UK reporting, for example in Forestry Statistics, and that it is discussed with the other devolved nations. We also need to be clear when reporting or comparing to explain why we are talking about 14.5% cover (inclusive of trees outside woods) instead of the 10% tree cover often reported (woodland only).

The use of the National Forest Inventory is sensible but appropriate resourcing of Forest Research and partners must be in place. The lag time for newly planted sites to show up on aerial or satellite imagery also needs considering.

### ***Do you agree or disagree that short rotation coppice and short rotation forestry plantations should be initially excluded from a woodland cover target?***

While we acknowledge again that our membership in professional forestry is broad, as an Institute we would agree with excluding short rotation coppice but disagree in the case of short rotation forestry.

Some SRF should be included as it offers many of the benefits we seek, including biodiversity, particularly when we consider that a rotation can be up to 30 years. If the site is UKFS-compliant it will often deliver more environmental benefits than orchards or hedgerow trees, which are included.

We need clarity on the status and the future of biomass; we know Defra is working on this and is aware some of these questions will need revisiting. Its potential to help us deliver on nature and climate outcomes is increasingly recognised. SRF and SRC have a part to play in the development of our farmed landscape and we need to support the transition. However, clearly it is preferable in terms of carbon sequestration if more of the timber we produce is used in housing as opposed to wood fuel, for long-term carbon capture.

### ***Do you agree or disagree with the proposed inclusion of trees in woodlands, as well as trees in hedgerows, orchards, in fields, and in towns and cities?***

We agree and welcome this. Individual trees and urban trees have significant value for nature and must not be overlooked.

### ***Do you agree or disagree with our proposed level of ambition for a tree and woodland cover target?***

As mentioned, we consider the setting of a target to be a political decision, but we support the use of evidence used to reach this figure with the exceptions and considerations discussed above. We need to focus on solving the barriers to achieving this target, specifically building the professional workforce we will need to deliver all the benefits of sustainable, modern forestry, and will continue to work tirelessly with governments, agencies and partners to this end.



## Conclusion

While we welcome much of the thinking behind the woodland targets, the approach needs to be more nuanced if it is going to enable trees and woodland to deliver for nature. The messaging in the consultation is confused about the value of woodland for biodiversity, the relationships between the different targets, and the delivery mechanisms that will be needed. Government needs to recognise timber production as one of the benefits of sustainably managed woodlands and fully acknowledge and raise awareness of the link between wood production and environmental recovery. We need all kinds of trees and woods to address the environmental crisis – for carbon capture, for nature, for substitution, for society's needs for wood products and not outsourcing our timber needs overseas – and this should be reflected in our environmental targets.