

Respondent Information Form



Tackling the Nature Emergency - Consultation on Scotland's Strategic Framework for Biodiversity

Please Note this form **must** be completed and returned with your response.

To find out how we handle your personal data, please see our privacy policy: <https://www.gov.scot/privacy/>

Are you responding as an individual or an organisation?

- Individual
 Organisation

Full name or organisation's name

Institute of Chartered Foresters

0131 202 8483

Phone number

Address

59 George Street, Edinburgh

Postcode

EH2 2JG

Email Address

shona.smyth@charteredforesters.org

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

- Publish response with name
 Publish response only (without name)
 Do not publish response

Information for organisations:

The option 'Publish response only (without name)' is available for individual respondents only. If this option is selected, the organisation name will still be published.

If you choose the option 'Do not publish response', your organisation name may still be listed as having responded to the consultation in, for example, the analysis report.

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

No

Tackling the Nature Emergency: Consultation on Scotland's Strategic Framework for Biodiversity

Questions

We are inviting responses to this consultation by **14 December 2023**.

You are not required to answer every question in the consultation. The consultation is set out in sections to help you identify matters in which you may have a particular interest.

Please note that Section 1 of the consultation document does not contain any questions, so question numbering starts from Section 2.

Section 2 – Scottish Biodiversity Delivery Plan

Question 2a: Have we captured the key actions needed to deliver the objective: accelerate restoration and regeneration?

- Yes

Please explain the reasons for your response:

Our members would and do welcome commitment from Scottish Government to a long-term strategic approach. The Institute raised concerns within the Scottish Forestry Grant Consultation earlier this year, around the lack of emphasis for native woodland creation, with more prominence needed on outcomes and more incentives for minor species and habitats. There needs to be a greater emphasis on management and restoration of existing woodlands including deer management and control of Invasive Non-Native Species (INNS) and it is encouraging to see these featuring within this strategy. Natural regeneration and natural colonisation also need to be encouraged, with less rigidity on timescales and stocking densities achieved. The Institute recommends that a maintenance grant and professional advice is applicable for all woodland creation types to support the ongoing management of woodlands, to allow for them to reach their full potential.

The Institute recognises the significant impact herbivore browsing and damage can have on biodiversity loss and its restrictions on regeneration. Our members are of the view that incentives need developing for better management of deer, to reduce their numbers to a sustainable level. This would greatly benefit open ground and transitional habitats. Unfortunately, it is perceived that Scottish Government view restoration targets of biodiversity in woodlands in isolation from productive woodland management. For restoration to work at a landscape scale, productive and unproductive stands need to be integrated to allow for interconnected habitats. There needs to be a desire to increase management of our small woodlands and provide support for diversifying silvicultural systems. A similar thought could be applied to

grey squirrels and government should learn from the situation in England, with the issues surrounding grey squirrel control and red squirrel protection.

In terms of our existing woodlands, and in particular ancient woodlands, a suggested improvement to the strategy in relation to restoration would be to ensure the Ancient Woodland Register is updated, rather than developing a new register. It seems an ineffective use of resources to reinvent the wheel, when amendments to the current system would be more than adequate.

Question 2b: Are the key actions, to support the objective: accelerate restoration and regeneration, sufficient to put Scotland on track to ending the loss of biodiversity by 2030?

- No

Please explain the reasons for your response:

Whilst we acknowledge the proactive approach taken to address the biodiversity crisis, there is an opinion amongst our members that there is currently a disconnect between habitats and climate change, with apprehensions raised that restoring some habitats to a previous state would in certain situations be impractical, unnatural, and poor value for money. This highlights that a review of current legislation and the Habitats Directive may be needed. The expected shifts in species distributions and habitat change due to climate change, need to be integrated, with additional thought given to natural success as a response. Unfortunately, the framework's ambition to ending the loss of all biodiversity is not a realistic goal in pure terms. We need a more realistic path towards adaptation and mitigation and a clear assessment as to which interventions are going to deliver most "value". The Institute would welcome the opportunity to engage with Government and supporting bodies to provide further guidance from a forestry perspective and convene representatives for a working group, should this be an outcome of this consultation.

Furthermore, we are concerned that the conflict between woodland planting and protected species will continue to grow if there is not a compromise amongst these priorities to find an effective balance that delivers cross-sector. There are many constraints to Government achieving biodiversity targets, including resistance to land use change, difficulties of operating at a landscape scale and the complex grant system. Our members are in full support of the forestry sector working to tackle the biodiversity, climate and timber emergencies. However, there are projects and planting schemes where striking a balance is becoming difficult, with the implication of some targets being prioritised over others.

The Institute recognises and fully supports the ambition for reducing deer densities across the Scottish landscape; this will aid improvements in ecosystem health and recovery of native woodlands. However, clarification would be welcome around how deer management will be incentivised, as this will require a long-term commitment at a landscape scale. This will require adequate support for landowners, through amended grants and systems. Confidence needs to be provided to land managers

that the strategy will assist with overcoming conflict and aid achievement of our biodiversity targets, rather than providing a further cause for polarisation cross-sector and with affiliate sectors.

Question 2c: Which actions do you think will have most impact?

Please state the actions and explain the reasons for your response:

Our members whole heartedly support the need to control and reduce deer numbers, with acknowledgment that this is one of the keyways that forest managers can support Scotland with reaching its biodiversity goals and fulfilling the strategy. The Institute recognises that the Native Woodland Survey published in 2014, acknowledges the negative impact that deer are having on the decline of ancient woodlands. In doing so, forestry professionals will be able to actively manage natural regeneration and native woodlands on a landscape scale.

We would recommend for Government to concentrate on increasing the creation of more diverse forests, on sites where deemed suitable and appropriate, in accordance with wider management objectives. However, there is concern that the haste to meet arbitrary percentages and diversity targets will lead to the wrong trees being planted in the wrong place, preceding to an increase in the percentage of failed establishment. Thus, temporarily meeting planting targets, but not supporting the biodiversity strategy long term.

Question 2g: Have we captured the key actions needed to deliver the objective: embed nature positive farming, fishing and forestry?

- Yes

Please explain the reasons for your response:

We are heartened that farming and forestry are being perceived with greater equability, with both parties needing to deliver on conservation, and business being managed across land management strategies and land uses. We need the barriers of engaging with forestry to be broken down within the agricultural sector. Our members suspect that the complexities of the accessing professional support and advice are hindering agriculture engagement, particularly with small woodlands and the incentives available not being adequate. Having a more accessible system may assist with bridging engagement between both sectors. We suggest that the farm woodland scheme and associated process which are currently applicable only to the Islands, are duplicated on the mainland as our members recognise this as an effective scheme.

Though there are two limiting factors within integrating forestry and farming successfully to create diverse woodland habitats: access to better quality ground, with greater species suitability and a significant reduction in deer numbers. The strategy, therefore, must set out a way that forestry planting can be achieved on

sufficient scale, so it can be both viable and deliver the wide variety of outcomes required.

Whilst the Institute fully supports the strategy, delivery plan and its purpose, we would question the approach to the matter. Though we would consider it to be the minority, some of our members are questioning the intentions with a general feeling that biodiversity is currently an overarching government priority, with the timber, climate and skills crisis not being effectively recognised– with the auxiliary role that each has with supporting the success of the strategic goals.

Our membership spans multiple sectors and specialisms, from commercial production to conservation and everything in between. A majority of our members consider sustainability to be at the forefront of their roles, with the economics a seemingly forgotten pillar within this strategy along with the advantages that productive forestry can bring, not just to the economy, but biodiversity and wider environmental benefits such as carbon. Whilst we appreciate that this is not necessarily a strategy to evaluate economics and production, we would welcome some clarification over the use of the term restoration and what this entails within the context of this strategy, and how Government sees the role of the rural economy being within this. These proposals in large speak to the converted who are already pursuing forest certification and sustainable practices. Increased focus is required for the minority, as the process of restructuring features highly within many forest management plans.

The concepts mentioned concerning restructuring and management interventions for species diversity within forest management objectives are not new. However, we appreciate that these require greater awareness, alterations in traditional practice and encouragement to implement for some professionals. As part of this strategy, we would like to see incentives to plant native woodlands in fewer larger blocks within a productive unit, providing larger areas to support biodiversity within the unit, ensuring that it would be actively managed as part of a certified plan. But this must only be implemented where conditions allow for effective establishment of a varied palate of species.

Question 2h: Are the key actions, to support the objective: embed nature positive farming, fishing and forestry, sufficient to put Scotland on track to ending the loss of biodiversity by 2030?

- No

Please explain the reasons for your response:

The suggested objectives currently feel too diluted with clearer messaging needed as the strategy does not seem to address how the conflict between different land uses will be balanced.

With the potential for increased biodiversity regulations reducing productivity and this impacting the sector's ability to achieve sustainable forestry, we are expressing concern over how any new regulations and processes will be enforced and whose

responsibility it will be. We would like to see more support for forest certification schemes, particularly the UK Woodland Assurance Scheme (UKWAS) as this is a positive driver for woodland owners. However, one of the barriers is the administrative time for processing and approving plans.

The suggestion to update woodland management guidance and plans to reflect greater emphasis on biodiversity, does not accurately reflect the outcomes of sustainable management, happening on a significant scale through UKWAS, under Forest Stewardship Council (FSC) and Programme for Endorsement of Forest Certification (PEFC) requirements already throughout Scotland. Though we acknowledge there is scope for improvement. This would certainly assist with site monitoring, avoiding duplication and ensuring consistency when updating woodland management guidance and plans. Our members would appreciate clarification on how the proposed monitoring is going to influence management without becoming an administrative exercise.

There needs to be further recognition for economic resilience. Our members would like to see a wider promotion of mixed woodlands, in parallel with the current productive systems which are encouraged. Consideration needs to be given to the costs associated with diversifying species, both in the forest and at sawmills with technology and processing. There has been a significant upsurge in native woodland expansion, which has resulted in concern within our membership over the continuity and quality of forests, amending the conifer default would encourage planting of mixed commercial woodlands. The Institute recommends that Government provides support for a wider variety of silvicultural systems, such as Continuous Cover Forestry to encourage diversity. This could then reduce the opportunities for land managers to manipulate the system and would encourage bigger picture thinking. Largely, we need to realise that for forests and woodland to deliver increased biodiversity and habitat connectivity alongside timber production and carbon outcomes, new woodland planting will need to increase within the lowlands. Unless there is proper integration this will clearly put it in conflict with agriculture.

As in all policy development there is a need for an integrated approach to delivery. The carbon scheme is a developing and changing market. To make this fit for purpose, our members feel that the natural capital needs to have a separation from other finance and regulatory work, as there is too much uncertainty and currently opposition is too great. Natural capital and carbon schemes should be an additionality, to avoid the perceptions of green washing. The Institute would like to see natural capital proposals considered alongside and connected to other strategic goals and policies, including climate change mitigation, flood alleviation and 'levelling up'.

Question 2m: Have we captured the key actions needed to deliver the objective: invest in nature?

- Unsure

Please explain the reasons for your response:

We are in support of the strategies proposals to develop guidance and support a programme of training and education for land managers to support best practice on a range of topical forestry issues. We recognise through our collaboration with other industry bodies, groups, fora and outreach work that the forestry sector is facing both a skills gap and a pay gap in the sector which are presenting a barrier to forestry businesses and organisations meeting their staffing needs. In turn, there needs to be consideration as to how this will impact development and implementation of new codes relating to the woodland carbon code and peatland code.

The Institute asks that Scottish Government continues to listen to sector expertise and work with the sector to commit to and deliver more funding for recruitment and training. Employers are wanting to invest in professionalism, and this can be achieved through the Institute of Chartered Foresters. We would encourage novel approaches, such as government supporting an internal Erasmus scheme whereby students anywhere can take forestry modules and receive credit for them. Furthermore, support should be provided for short practical training courses such as those recommended by the Forestry Skills Forum.

A change in direction of the forestry sector has been highlighted by the increase in business skills and greater demand for leadership-based roles, which can include greater interaction and communication cross sector than was originally the case. Another common theme is an increased interest in pests and diseases, collaborating with plant health, control, and management.

We are aware that there is some speculation surrounding the short course and Further Education provision for forestry and affiliate sectors. There seems to be a disconnect between industry and education establishment when delivering what is perceived to be needed, over what is needed. Very little will change if these issues around communication are not addressed. Government needs to make training accessible for all with an interest in the sector, this should include a provision for contractors who provide the technical skills needed to maintain our forest resource. There is a need to improve the perception of the sector, by raising awareness of the positive impact forestry has.