1 Introduction
The Forest Policy Group is a new informal policy grouping representing those working at community level and/or on the native woodland agenda who share common ground in their vision of and aspirations for forestry in Scotland. The group consists of representatives of community and native woodland organisations, and the private sector.

We would like to present the following as our joint response to the consultation draft of the Scottish Forestry Strategy. If useful, we would be glad to work up some of our points further, and would therefore welcome an early opportunity for discussion.

2 General comments
We welcome the draft Strategy which we believe is a “good step on” from the 2000 Strategy. We are in broad agreement with the Vision and aspirations, and are particularly glad to see the extent and manner to which social and environmental issues are incorporated.

Articulation of its numerous objectives has necessarily made this draft a complex document, in which the relative emphasis amongst/between the proposed outcomes and objectives is not readily discernible. We suggest that the following points on structure and format of the Strategy would strengthen the overall approach.

2.1 Timescale
Whilst we agree the need for a 5 year framework to guide delivery, we feel it is essential that the Strategy recognises forestry’s inherently long timescales, and takes a longer term perspective.

- Page 24: Our Vision for 2025 and beyond, the table should be expanded to 2050. The first box under 2025 and 2050 should give a more detailed indication of the quantity and composition of future forest (productive and otherwise).

2.2 “How?”
As stated, we welcome the draft and believe that it contains many of the right words. However, its analysis of threats and hurdles, opportunities and solutions is thin, and we suggest the document would gain much by detailing the mechanisms by which objectives are to be delivered. A prime example of this is the need to describe how climate change will be tackled. In the absence of this level of detail, we find Part Three: Delivery unconvincing, being rather more a statement of how things are than a description of how the Strategy will meet its goals.

This could be remedied by the addition within each Key Theme, after “What needs to be done?”, of a section which asks and answers “How will it be done?” Key mechanisms and requirements from these new sections would give greater focus in the Delivery section, and could potentially be cross-referenced with Resources (see 2.4 below).

2.3 Targets and outputs
We believe that the Strategy would also be enhanced by the inclusion of many more measurable targets and outputs. These could be incorporated per Key Theme under “What needs to be done?” by the addition of tables setting 5, 10, 20 and 50-year measurable targets.

2.4 Resources
Finally in this section, we suggest that the Strategy would be made more “business-like” and have much greater applicability if it were to include information on resources and their allocation under the different themes.

3 Scottish forestry in context
We welcome the analysis of context (Part One), but believe that the following 3 points need to be made more explicitly:

3.1 Energy efficiency of the forest industry
Energy efficiency as a sine qua non of sustainability. The draft recognises the need to tackle climate change, to insure against future uncertainties by broadening the range and scale of business opportunities in forestry, and to reduce road miles, but falls short of articulating energy efficiency as a stand-alone element of the context.

The impact of energy costs on the forest industry and the viability of its trade should be a major driver in planning our future forest and its management and use. Given current and likely future trends in oil/energy availability we feel strongly that Part One: Context should include an explicit self-standing section on energy efficiency, setting ambitious targets for increased energy efficiency, and self-sufficiency in timber supply.

Increasing energy scarcity (or costs) could quite quickly demand a much closer correlation between location of forests, processing facilities and markets, as well as more home-grown timber overall, and a greater diversity of sawlogs including higher quality timber. It is therefore vital that the Strategy begins now to address this case.

The inclusion of this as a major element of the Context and its reiteration in Principles (2.1.1) would underpin many of the draft’s laudable aims, such as “enhancing local economic value” (1.4.20) and “encouraging investment in a broader range of ... forestry-related businesses” (1.4.27), not to mention “improving the competitiveness of ... forestry” (1.4.26). It would be useful if the Strategy could incorporate a summary of the industry’s current energy consumption, as the basis for targets.

Obviously energy efficiency is a huge challenge, but it is also the opportunity to build a much more resilient industry for the future. One significant opportunity to which the Strategy should play is the potential for rapid innovation and development in processing plant over the decades to 2025 and 2050.

3.2 Climate change
We are glad of the priority given to climate change amongst the Key Themes, but alarmed that delivery of action will in effect lag behind other Themes. We recognise that the draft Strategy awaits publication of the Executive’s Scottish Climate Change Programme, but feel that circumstances require much greater urgency of action than is suggested in Key Theme 1. Development - indeed implementation - of an adaptation strategy for climate change is of paramount importance and we hope that the final revised Strategy will contain at least the bones of this, and be more action orientated. This is an obvious area of the draft which would be strengthened by the suggestions we have made in 3.1, and 2.2, above.

We would also like to express caution about the following:

- 2.4.8 and 2.4.9, last bullet points of each, regarding forest expansion on agricultural soils and establishment of SRC. Forest establishment on agricultural land is hard to reverse, and it would be undesirable to initiate a “knee-jerk” reaction here. We suggest
the addition of “... guided by strategic assessment of the respective land requirements for forestry and agriculture in the future”. (And see 3.3 below).

- **2.4.9, 2nd last bullet point**, regarding the favouring of faster-growing species. There is a danger that this provides a false rationale for increasing the supply of Sitka spruce, which would fly in the face of the Strategy's aims for diversifying into hardwoods and other slower-growing softwoods. We suggest this bullet be deleted, or amended with clear guidance about which species provide the best long-term carbon sequestration.

With regard to both climate change and energy efficiency, we consider that the draft underplays what forestry is capable of delivering to other policies of the Executive. Increasing the diversity, adaptability and localness of forestry would at once help to tackle the threats of oil scarcity and climate change, as well as contributing to the long term sustainability of rural land use, the health, well-being and resilience of rural communities, and the Scottish economy as a whole.

### 3.3 Forestry with respect to other land uses

We also believe that the Strategy needs to look at integration with land use sectors, notably agriculture and also sporting, recreation and increasingly energy generation.

### 4 Specific recommendations

#### 4.1 Native Woodland Targets

The draft suggests some highly appropriate medium and long term targets for the increase in the proportion of native species in the resource (e.g. 35% by 2025, 40% in FE woodlands by 2050), which we support, with the following caveats:

- private sector woodlands are already at or exceed this target, so this fails to send a signal to the private sector that a continuing programme of species diversification in favour of native species is sought;
- with the exception of one target for short term new planting (40k ha by 2015) it is not made clear how the increase in native species is to happen, and the scale of change required (i.e. an extra ca 150 Kha of native species by 2025);
- the 40% target for the FE, whilst highly appropriate, can only be achieved by significant conversion of conifer woodland to native species managed for both conservation and timber, and this is not signalled clearly in the draft.

The current draft could be strengthened by:

- **Page 27, Outcome 3** adding a bullet point in bottom right hand box “conversion of significant areas of conifer woodland to native species managed for both conservation and timber, especially by FE”.
- **Key theme 7: Biodiversity**. In “What needs to be done”, add bullet point under Landscapes and Ecosystems, “conversion of significant areas of conifer woodland to native species especially by FE”.
- **page 48, Delivery: the national forest estate**. This section is weak and needs to be more specific about FE’s contribution to:
  - native woodland restoration and forest landscape restoration projects;
  - PAWS restoration;
  - growing broadleaves for quality timber.
4.2 Hardwood timber

We support the references to growing broadleaves for quality timber in the text and the fact that hardwoods are acknowledged alongside softwoods as being suitable for timber production. However, the potential of the hardwood sector should be brought out more clearly. The use of Scottish hardwood has been championed by regional initiatives such as Woodschool and there has been a 50% increase in Scottish hardwood use from 1996-2003 (Watt 2003). This increase has been in a domestic hardwood processing sector and has compensated for the drop in chockwood use. The role of Woodschool, AGWA and others such as ASHS in developing this market needs flagged up in the descriptive text relating to economic development and a statement relating to this NGO and private sector growth as a contributor to economy and jobs should also be included.

Existing references in the text need to be augmented by:

- **Context**: Inserting after section 1.4.18 “The quality hardwood sector in Scotland is not well developed. Whilst Scotland produces more softwood timber than it consumes, it still has large net imports of hardwoods. This situation could be remedied by greater investment in:
  - quality hardwood crops in Scotland,
  - marketing assistance to small scale processors and
  - the further development of the Albanach brand.”
- **Our vision for 2025 and beyond**: Insert in column 2, 6th box from top (under native woodland): “Growing hardwoods for quality timber will be well-established.”
- **Key theme 8: Timber: Key indicators**: add to bullet point “and covering both softwoods and hardwoods” Other indicators: add bullet point “Area of broadleaved woodland established at densities suitable for quality timber production”

4.3 Wood energy

It is encouraging that the draft strategy places emphasis on the need to promote use of wood as a renewable energy source and facilitate the development of an efficient supply chain for wood fuel. There is a concern that existing wood fuel suppliers, who operate on a small-scale and are providing the basis for developing future Scottish wood fuel markets, will be put out of business by larger scale operations once the market has been established. This would have significant negative impacts on employment and infrastructure of rural communities and a poor legacy to leave these current market drivers. The Strategy should make a commitment to supporting small-scale locally based wood fuel suppliers, through supporting them in providing a competitive quality product and promoting their role in the domestic energy market. The strategy should reflect this in the following ways:

- **Page 26, Outcome 2.** In the “support development of markets for forest products” box add a bullet point: “Providing support to enable small-scale business (such as wood fuel suppliers) to provide high quality and competitive products for local domestic markets”.
- **Key theme 1: Climate Change, under “What needs to be done?”**, modify the following bullet point: “Promote and facilitate the development of an efficient supply chain for wood fuel, including small-scale and large-scale suppliers of high quality product, and establish a cost-effective basis for monitoring wood fuel use and carbon saving”.
- **Key Indicators, 2.4.11**, Add the following indicator: “Proportion of wood fuel and other wood products available from local outlets in forest/woodland areas”.
- **Key theme 2: Business Development**, add the following bullet point: “Provide support to enable small-scale business (such as wood fuel suppliers) to continue to provide high quality and competitive products for local domestic markets”. This will include working with local authorities and developers, and supporting a programme to increase quality of wood fuel production by small-scale producers.
4.4 Land Management Planning and role of FE
Recognising the role that Land Management Planning will have in the delivery of Land Management Contracts, it is vital that both the private and state forestry sectors play a full role in this so as to ensure that opportunities in various themes identified in the Strategy are not lost. This is particularly relevant to the state sector which may go through a process of adjustments to its land holdings over the next five years, and any sale of state land needs to have taken into account regional/local priorities identified through Land Management Planning and other processes. This could include issues covered under the themes of Climate Change, Environmental Protection and Biodiversity. The following sentences should be inserted into the Strategy:

- **Key Theme 1, Climate Change: 2.4.4.** “Engage in and utilise Land Management Planning as it develops alongside Land Management Contracts to ensure that both the private and state woodlands play a full role in developing regional adaptation strategies”.

- **Key Theme 6, Environmental Protection: 2.9.8.** “Use Land Management Planning to enable Forest Landscape Restoration opportunities to be identified, utilising both the State and Private Sector’s land holdings”.

- **Key Theme 7, Biodiversity: 2.10.3.** under sentence starting “ensure biodiversity is an integral consideration...”, add “.. and Land Management Planning”.

4.5 Affordable Housing/Forest Crofts
We fully support the acknowledgement within the draft of the importance and diversity of ways in which woodlands can contribute to housing need, sustainable use of woods, and healthy communities/living. This relevance is somewhat buried within the document however and the huge importance this area could have in promoting a forest culture in Scotland risks being lost.

(Affordable housing/building material gets a mention on pages 25, 26, 33, 34, 35 and 45, with Forest Crofts on 33 and 35).

It might therefore be appropriate to include this relevance as follows:

- **Page 24, Our Vision for 2025 and beyond, in 2nd 2025 box, “...and supplying a substantial provision of a home grown and fabricated, affordable housing industry.”

- **And in 3rd box, “Community engagement with, ... woodlands is widespread, with timber built housing and forest croft type communities further contributing to the development of a healthy forest culture”.

- **Similarly, on Page 25, Outcome 1, Objectives.** The addition of a further bullet point: “Providing land for affordable, wooden housing and forest smallholding/croft type settlements” would further help promote this essential part of the vision.

4.6 Targets relating to social benefits
We support the incorporation of community development, learning and skills, access and inclusion and business development into the 8 key themes through which progress towards outcomes will develop. However we are disappointed with the associated indicators and targets. Specifically we note that:

- Despite a commendable strong emphasis that forestry in Scotland should be developed for the benefit of people there are no targets relating to the intended social benefits of the strategy

- The suggested indicators for community development (2.5.7/ 2.6.6/ 2.6.7) and life-long learning (2.7.8/ 2.7.9) will not reflect the quality of the processes i.e. the quality of the jobs provided and community group partnerships established; or the impact of these on wider community development, inclusion, life-long learning etc.
The strategy should make commitments to developing a means of monitoring its social impact on these themes, as well as a commitment to regular evaluation of progress. We recommend the following changes:

- **Our Vision for 2025 and beyond (p24).** “By 2025 the health and social benefits of public and private forestry are well established. The role of forestry in achieving health, education, development, and environment and rural development sector goals is clearly outlined in respective departmental strategies and activities.”

- **Outcome 1: Improved health and well-being of people and their communities (p25).** In the “Support community development” box add a bullet point: “Developing and implementing a method for monitoring the social impact of forestry that will demonstrate value of a sustainable forestry culture across all Scottish Executive land use and development departments in the long term”. Key theme 2: Business Development (p32-34), Modify the following key indicator: “Number of farm holdings/local businesses involved in woodland creation, management or processing of woodland products” and add “Impact of spending by forest-related business on local economies” (i.e. local multipliers of forest-related business).

- **Key theme 3: Community Development (p34-35),** Add bullet point under “What needs to be done?”: “Develop a monitoring and evaluation framework that allows the social benefits of forestry, across all 8 themes to be monitored and targets for improvements to be established”. In order to effectively and cost-efficiently monitor social benefits this is likely to include a combination of quantitative and qualitative indicators and participatory evaluation exercises.

- **Key Theme 3: Community Development, 2.6.6.** A key national indicator for community development should refer to a ‘community development or empowerment index or narrative’ that is developed as part of the monitoring and evaluation framework outlined in section 2.6.3. The indicator will be both quantitative and qualitative and will seek to demonstrate change in development of social capital (such as active citizenship, involvement in social networks, participation in the community and community power) associated with ownership of and involvement with forest and woodland. Some aspects of the index may be monitored at a national level, whereas others will be monitored through participatory evaluation of random, stratified intervention areas. This could be applied to a range of schemes from community ownership and the National Forest Land Scheme to forest education schemes and communities living in the vicinity of wood fuel management areas.

- **Monitoring and reporting (p51)** This section needs to outline the commitment to developing a monitoring and evaluation framework that establishes the impact of the SFS on people and sustainable development. This is a priority and should be informed by recent studies commissioned by the Forestry for People Panel and Central Scotland Forest Trust A baseline should be established in 2006 – 2007, and as with other indicators, monitoring should take place on a 5 yearly basis.

4.7 Core support for organisations

FCS will recognise that small community- and native woodland organisations have long played a significant part in helping to develop and implement forestry policy. We welcome the draft’s spirit of engagement with community groups in **Key Theme 3: Community Development** and identification of the need to maintain constructive involvement with them (1st bullet point). We are aware that the successor to the SFGS will provide support for such organisations under its Partnership Programme.

However we would like to underline the importance of core funding as opposed to project funding, and suggest an additional bullet point “Providing support to community woodland based
organisations which own or manage woodland, and to NGOs which deliver native woodland management advice or support small scale rural development”.

5 **Further information**

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