

August 2008



Forestry Commission Scotland's response to feedback from the public consultation on the draft Climate Change Action Plan (2008-2010)

A public consultation on Forestry Commission Scotland's draft Climate Change Action Plan 2008-2010 took place between 11 March and 6 June 2008. A **report** on the results of that consultation was placed on the FCS web site in early August.

Consultation respondents were asked to structure their comments under two headings:

- general comments; and
- detailed comments (relating to specific pages)

The report distilled the above comments in to 12 key messages and our response focuses on them. Our response to the large number of other general and detailed comments will be evident from the revised Action Plan.

Key messages	FCS response
Climate change assumptions will need to be reviewed once UKCIP08 ¹ is published.	Climate change assumptions will be kept under continuous review and UKCIP 08 will be part of that process. The two-year life of this first Climate Change Action Plan (CCAP) recognises the need for it to be dynamic.
The proposed actions need to have time-scales and measurable outcomes. There should be a greater sense of urgency.	We recognise the desire for a greater sense of urgency. The early actions will focus on getting the building blocks in place for an appropriate mix of short-term and longer-term outcomes while avoiding knee-jerk responses to the complexities and uncertainties of climate change. The two-year life of the CCAP sets the realistic time-scale of actions and the revised Action Plan will also indicate those actions where a shorter delivery time is appropriate. Measurable outcomes will flow from the specific actions and will be reported primarily through the Scottish Forestry Strategy Implementation Plan process.

¹ [UK Climate Impacts Programme](#)

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Key messages	FCS response
More recognition is required of the non-FCS forestry sector as this now owns/manages two-thirds of Scotland's forest resource.	The CCAP focuses on what <u>FCS</u> will do, in its leadership capacity, to increase the contribution and response of Scottish forestry to the challenges of climate change. Nevertheless, we entirely agree that the non-FCS sector is crucial to delivery. We will aim to better recognise and reflect that in the revised Action Plan.
Greater cross-linkage is required with other land uses to ensure an integrated approach to tackling climate change.	An integrated approach to land use is fundamental to Scotland's success in tackling climate change. We will use the Action Plan to help in that process.
The Plan needs to review the balance it conveys between: new woodland and existing woodland; mitigation and adaptation; and wood for energy and wood for other uses.	The challenges presented by climate change require forestry to respond effectively on all fronts. The Action Plan will help achieve the right balance of those responses and will also create better synergies between them. Underpinning the whole Action Plan are the principles of sustainable forest management.
Many of the proposed actions will require a regional perspective. The Plan should articulate how this will happen.	Like the Scottish Forestry Strategy, the CCAP presents a national perspective. We agree that regional perspectives will be crucial to delivery on the ground. The revised plan will clarify how those linkages will be made.
Robust methods of carbon accounting, coupled with life cycle analysis, are required.	We fully accept this point and current work-streams within Forest Research are addressing it. We will strengthen the appropriate sections of the Action Plan accordingly.
Appropriate funding packages will be required if the forestry sector is to play its full part in helping to tackle climate change. The effectiveness of Rural Development Contracts must be kept under review.	Support for the forestry sector will need to encompass market 'pull' mechanisms as well as the 'push' role of incentives. The revised Action Plan will confirm a commitment to monitor and review the uptake of Rural Development Contracts.
The national forest estate, managed by Forest Enterprise Scotland, should be a catalyst for action.	We accept this. The role of Forest Enterprise Scotland (FES) is to provide Scottish Ministers with a direct land management capability for delivering the Scottish Forestry Strategy and other Scottish Government priorities. That includes a key role of "providing exemplars of best practice and expertise/leadership in land management." (See FES's <u>framework document</u>).
There is a need for clear advice based on sound science rather than perception.	The science of climate change is evolving rapidly and we need to make decisions on the best available evidence. By focusing on 'no regret' options and keeping the Action Plan under regular review short-term imperatives can be accommodated within a longer-term, flexible framework of action.
Further thought is required on how progress will be monitored and reported.	The revised Action Plan will clarify the progress and monitoring framework.
The format and accessibility of the Plan should be improved.	We aim to address this point.