

The Environmental Assessment of Plans and Programmes
(Scotland) Regulations 2004

Strategic Environmental Assessment (SEA) of the Scottish
Forestry Strategy

POST ADOPTION SEA STATEMENT

Prepared for The Forestry Commission Scotland
By
Land Use Consultants



November 2006

POST-ADOPTION SEA STATEMENT – COVER NOTE

COVER NOTE - SECTION 1

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COVER NOTE - SECTION 2

A Post-Adoption SEA Statement is attached for the plan/programme entitled: The Scottish Forestry Strategy. The Responsible Authority is The Forestry Commission Scotland (FCS).

COVER NOTE - SECTION 3

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Signature & date:



9th November 2006

1. BACKGROUND

Post-Adoption SEA Statement for The Scottish Forestry Strategy, 2006

Adopted on: **9th October 2006**

Responsible Authority: **Forestry Commission Scotland.**

2. INTRODUCTION

This document (referred to here as the Post-Adoption SEA Statement) has been prepared in accordance with the provisions of Regulation 20(2) (3) of the Environmental Assessment of Plans and Programmes (Scotland) Regulations 2004.

3. AVAILABILITY OF DOCUMENTS

The full Strategy as adopted, along with the Environmental Report and Post-Adoption SEA Statement are available on the Responsible Authority's website at:

www.forestry.gov.uk/sfs

The Strategy, as adopted, along with the Environmental Report and this Post-Adoption SEA Statement may also be inspected free of charge at the principal office of the Responsible Authority:

Forestry Commission Scotland, Silvan House, 231 Corstorphine Road, Edinburgh, EH12 7AT.

Times at which the documents may be inspected or a copy obtained:

Monday to Friday 0900hrs to 1700hrs.

To minimise delays for those wishing to view the documents we would be grateful if you could let us know when you would like to visit. Please telephone: 0131 314 6156 or e-mail: fcscotland@forestry.gsi.gov.uk

4. KEY FACTS

Name of Responsible Authority: Forestry Commission Scotland (FCS)

Title of Plan/Programme: Scottish Forestry Strategy 2006

Plan purpose: The Scottish Forestry Strategy (SFS) provides an integrated framework for the development of forestry in Scotland over the first half of the 21st century and beyond, with a focus on the key priorities over the next decade.

What prompted the plan (e.g. - a legislative, regulatory or administrative provision?): The first SFS was produced in 2000 as part of the commitments made in the post-devolution Partnership Agreement. It contained a commitment for a review of the Priorities for Action after 5 years.

Plan topic (e.g. transport): Forestry

Period covered by Plan: Focused on 2006-2016 but with long term strategic aims for the century.

Frequency of Plan updates: The need for review will be considered every 5 years.

Plan area: Scotland

Summary of nature/ content of plan: The SFS sets out the long-term directions for forestry in Scotland. It focuses on the ways in which the environmental, social and economic aims of the sector can be balanced, and sets an agenda for future action by identifying a series of key outcomes and themes for Scottish Forestry.

Date adopted: 9th October 2006

Contact name & job title: Hugh Clayden, Policy Advisor, Sustainable Forest Management, Forestry Commission Scotland, Silvan House, 231 Corstorphine Road, Edinburgh, EH12 7AT

Date: 9th November 2006

5. STRATEGIC ENVIRONMENTAL ASSESSMENT PROCESS

The Scottish Forestry Strategy 2006 (SFS) has been subject to a process of strategic environmental assessment (SEA), as required under the Environmental Assessment of Plans and Programmes (Scotland) Regulations 2004. This has included the following activities:

- Taking into account the views of the Scottish Environment Protection Agency, Scottish Natural Heritage and the Scottish Ministers (Historic Scotland) regarding the scope and level of detail that was appropriate for the environmental report.
- Preparing an Environmental Report on the likely significant effects on the environment of the draft Scottish Forestry Strategy which included consideration of:
 - the baseline data relating to the current state of the environment of Scotland;
 - links between the plan and other relevant policies, plans, programmes and environmental objectives;
 - existing environmental problems and issues affecting the plan;
 - the plan's likely significant effects on the environment (positive and negative);
 - the mitigation and enhancement measures envisaged;
 - an outline of the reasons for selecting the alternative chosen;
 - monitoring measures to ensure that any unforeseen environmental effects will be identified allowing for appropriate remedial action to be taken.

Consultation on the Environmental Report was undertaken in parallel with the second 12-week consultation period on the content of the draft Scottish Forestry Strategy itself. Both the SFS and the accompanying Environmental Report were made available online and at the premises of the Forestry Commission Scotland (FCS). The consultation period ran from 6th March to 29th May 2006.

Following the consultation period, the Environmental Report and the results of consultation on it were taken into account and used to guide the final decisions regarding the content and scope of the Scottish Forestry Strategy 2006 (SFS).

The final version includes a commitment to monitoring the significant environmental effects of the implementation of the SFS to identify any unforeseen adverse significant environmental effects and to take appropriate remedial action. This has been integrated with plans for monitoring the progress made to delivering the SFS itself.

6. How environmental considerations have been integrated into the Scottish Forestry Strategy and how the Environmental Report has been taken into account

Although no significantly adverse environmental impacts were identified, the SEA of the Draft SFS raised a number of minor environment issues that could be addressed by amending the content of the Strategy as it evolved. Most minor impacts relating to a specific outcome or theme were addressed by other components of the SFS, as noted in further analysis undertaken during the SEA. Some recommendations were also made on mitigation and enhancement and these were built into the SFS as it was drafted and finalised.

Table 6.1 below sets out the key findings raised in the Environmental Report, and explains how they were integrated into the SFS.

Table 6.1 Environmental considerations raised in Environmental Report, and response taken in finalised SFS

Draft SFS component	ENVIRONMENTAL CONSIDERATIONS AND FINDINGS FROM ENVIRONMENTAL REPORT	INTEGRATED INTO SFS?	HOW INTEGRATED/TAKEN INTO ACCOUNT OR REASON FOR NOT BEING TAKEN INTO ACCOUNT
Outcome 1	Potential tensions between providing accessible woodland and maintaining biodiversity	Yes	Addressed by balancing Key theme 5 with Key theme 7 within the finalised SFS
Outcome 2	Potential uncertainties in relation to sustainable soil and water management and minimising the use of resources	Yes	Addressed by balance with Outcome 3 of the finalised SFS. Includes aim of increasing the use of low impact systems of forest management and refers to importance, and the overall objective, of contributing positively to soil, water and air quality.
	Potential negative impact / uncertainty arising from need to reduce harvesting and transport costs in relation to communities and well-being	No	SEA also concluded positive contribution of this outcome and identified that an appropriate balance could be struck.
Outcome 3	Potential uncertainties / tensions in terms of increasing contribution to renewable energy resources	Yes	Notes that renewable energy schemes should be subject to environmental safeguards under Key theme 1 of the finalised SFS.
	Possible biodiversity impacts arising from rapid net sequestration of carbon and development of wood fuel sector	Yes	Will be borne in mind during preparation of a forestry sector Climate Change Action Plan, as proposed in the finalised SFS. Strategy also states a commitment to refining carbon sequestration modelling to reflect the Scottish situation. Will require further consideration at local level and has been raised in relation to SEA of Forest District Strategic Plans (FDSPs).

Draft SFS component	ENVIRONMENTAL CONSIDERATIONS AND FINDINGS FROM ENVIRONMENTAL REPORT	INTEGRATED INTO SFS?	HOW INTEGRATED/TAKEN INTO ACCOUNT OR REASON FOR NOT BEING TAKEN INTO ACCOUNT
	Uncertainties regarding effective waste management	Yes	Finalised SFS includes objective of securing effective waste management by participation in the Executive's National Waste Plan.
	Possible landscape impacts arising from increase in rapid net sequestration of carbon	Yes	Key theme 6 of the finalised SFS sets parameters for landscape management and enhancement that will require to be balanced with Key theme 1 Climate Change at the implementation level. Will require further consideration at local level and has been raised in relation to SEA of FDSPs.
Theme 1 Climate Change	Potential negative impacts of biomass on soil	Yes	Sustainable soil management noted in finalised SFS (e.g. under Key theme 6) and raised also in relation to climate change adaptation (Key theme 1). Will require further consideration at local level and has therefore been raised in relation to SEA of FDSPs.
Theme 2 Business Development (now Theme 3)	Uncertainties regarding impacts of business development on biodiversity and sustainable deer management	Yes	Improved reference to best practice deer management made within SFS and need for collaborative working in line with national level partnership agreement now emphasised.
	Uncertainties about impacts of increased woodland on landscape	Yes	References to positive role in landscape conservation made under Key theme 6. (see final point under Outcome 3 above).
Theme 3 Community Development (now Theme 4)	Uncertain contribution to valuing existing and new trees within the development control process	Yes	Finalised SFS makes specific reference to need for development control to play a positive role in providing further trees and woodland to assist with providing biodiversity benefits
Theme 4 Learning and Skills	No issues raised	N/A	N/A. Now incorporated under relevant themes in finalised SFS.
Theme 5 Access and Inclusion	Potential conflict between biodiversity and access	No	Unlikely to be resolved completely at a national or strategic level. Requires further consideration at local level and as part of implementation process.
Theme 6 Environmental Protection (renamed Environmental quality)	Potential minor negative impacts associated with removal of waste timber on biodiversity	No	As above
	Uncertainty regarding impacts on landscape and historic environment with increased forestry	Yes	Increased reference to both landscape and historic environments (also noting their interrelationship) under Key theme 6
Theme 7 Biodiversity	Possible tension with deer management due to non specific statements	Yes	Improved reference to best practice, collaborative working for deer management throughout the document

Draft SFS component	ENVIRONMENTAL CONSIDERATIONS AND FINDINGS FROM ENVIRONMENTAL REPORT	INTEGRATED INTO SFS?	HOW INTEGRATED/TAKEN INTO ACCOUNT OR REASON FOR NOT BEING TAKEN INTO ACCOUNT
Theme 8 Timber (now Theme 2)	Uncertainty regarding impact on quality of life	Yes	Addressed by balance struck by overall SFS. Document makes reference to Quality of Life indicators under Key theme 4. Key theme 3 also aims to secure business development in a sustainable way, thereby providing community benefits (e.g. rural diversification and supporting fragile communities). Specific reference is made to reducing the environmental impact of timber transport.
	Potential soil, air and water quality issues arising from timber production	Yes	SFS Section 3 notes that the SFS is underpinned by the UK Forestry Standard, Sustainable Forest Management, and the UK Woodland Assurance Standard. Theme 2 notes that production must be undertaken without compromising sustainable forest management.

For the purposes of cross checking the findings from the SEA, **Table 6.2** below sets out the key findings that arose in relation to each of the topic areas, across the outcomes and themes of the SFS.

Table 6.2: Issues arising in relation to SEA topic areas, and response within finalised SFS

SEA topic	Issue	Addressed in revised SFS?	How addressed / reason for not taking into account
Biodiversity flora and fauna / climate	Potential uncertainties regarding effects on biodiversity of growing timber for carbon sequestration and wood fuel	Yes – as far as possible	Will be borne in mind during preparation of a forestry sector Climate Change Action Plan, as proposed in the finalised SFS. Strategy also states a commitment to refining carbon sequestration modelling to reflect the Scottish situation. Will require further consideration at local level and has been raised in SEA of FDSPs.
Landscape	Minor negative effects arising from planting for wood fuel, bio energy and carbon sequestration	Yes – as far as possible	Key theme 6 of the finalised SFS sets parameters for landscape management and enhancement that will require to be balanced with Key theme 1 Climate Change at the implementation level. Will require further consideration at local level and raised in SEA of FDSPs.

SEA topic	Issue	Addressed in revised SFS?	How addressed / reason for not taking into account
Population and human health	Possible issues arising from increases in transportation of wood products and wood fuel on biodiversity and access	Yes – as far as possible	Difficult to resolve at a strategic level but specific reference is made to reducing the environmental impact of timber transport. Key theme 2: Timber makes reference to the Strategic Timber Transport Scheme and Forum, and Timber Transport Groups. Finalised SFS aims to develop a system for monitoring timber miles. Has been raised as an issue requiring further consideration in the SEA of FDSPs.
Air quality	Possible impact of transport arising from wood fuel / biomass on air quality		
Water and soil	Uncertainties regarding effects of increased planting and harvesting on soil and water quality	Yes	Improved references under Key Theme 6 relating to soil and water quality in finalised version. SFS Section 3 notes SFS is underpinned by the UK Forestry Standard, Sustainable Forest Management, and the UK Woodland Assurance Standard.

As noted in Section 4.4 of the Environmental Report *“the only outstanding issue is a degree of uncertainty about the interaction of a number of SFS objectives and themes with the SEA objective of securing sustainable deer management. This may reflect that the potential raised by the SFS in terms of woodland expansion, carbon sequestration, improved timber quality etc. is likely to be most easily achieved if the deer population is reduced to a level that other interests might consider to be lower than that required to achieve their objectives (e.g. sporting interest).”*

Scottish Natural Heritage (SNH) subsequently commented on this issue and noted that these problems were possibly overstated as a result of established deer management approaches and the accepted need for risk assessment to be undertaken in line with the Joint Agency Statement on deer management. As noted in Table 6.1 above, the finalised SFS makes reference to best practice in deer management and notes that no simple solution can be reached at a strategic level.

SECTION 7 HOW OPINIONS EXPRESSED DURING CONSULTATION HAVE BEEN TAKEN INTO ACCOUNT

Table 7.1 below summarises the comments received on the Environmental Report, and sets out how they were taken into account in finalising the Scottish Forestry Strategy.

Some of the comments related to the content of the Environmental Report, as opposed to advising on its implications for finalising the SFS. These have been noted and will be taken into account as far as possible during the subsequent SEA of Scotland's 14 Forest District Strategic Plans (FDSPs).

Table 7.1 Consultation responses and consequent amendments to the Environmental Report

CONSULTEE / RESPONDENT	SUMMARY OF COMMENTS	HOW THE COMMENT WAS TAKEN INTO ACCOUNT IN MAKING THE DECISION TO ADOPT THE FINAL PLAN/PROGRAMME
Historic Scotland	Comments on datasets to be included in baseline for Environmental Report, including historic gardens and designed landscapes (HGDL) and Historic Land-use Assessment (HLA).	<p>Noted – defined as an issue for future analysis. SFS refers to both datasets. SEA took into account HGDL but not HLA given partial coverage at national level (c.60% of Scotland).</p> <p>Theme 6 notes that the HLA should be referred to in Forest Design processes and that the IGDL should be a guide for sympathetic management.</p> <p>Recommendation that this is also reviewed in the SEA of FDSPs.</p>
	<p>Focus on nationally important cultural heritage sites. For example, in relation to scenario exploring 'evolution without SFS' should note potential impacts on undesignated archaeological sites.</p> <p>Would also welcome further information on how FCS will manage potential impacts on local sites, particularly for planting proposals.</p>	<p>SFS makes reference to wider historic environment by applying Guidelines relevant to the Historic Environment and the UK Forestry Standard.</p> <p>Finalised SFS makes reference to broader indicators, as agreed with Historic Scotland. It also encourages integration of online data sources.</p> <p>Issue also for further consideration in SEA of FDSPs.</p>
	Lack of specific reference to cultural heritage within assessment.	<p>The finalised SFS refers to both the historic environment and cultural heritage and includes references to broader historic values – e.g. historic landscapes.</p> <p>It is agreed that it would have been useful to have an Environmental Report summary specifically relating to cultural heritage. This would not, however, have brought attention to any further significant issues. The point has therefore been noted and will be taken into account in the SEA of FDSPs.</p>

CONSULTEE / RESPONDENT	SUMMARY OF COMMENTS	HOW THE COMMENT WAS TAKEN INTO ACCOUNT IN MAKING THE DECISION TO ADOPT THE FINAL PLAN/PROGRAMME
	Assessment of alternatives: rural diversification scenarios could have adverse impacts on cultural heritage, depending on proposals encouraged – e.g. biomass developments.	Agreed. Appropriate balance has been struck through selection of alternatives leading to finalised SFS. Again, resolution of conflicts will be a matter for local consultation.
	Outcome 2 (wood fuel and bioenergy) could have adverse effects on historic environment – e.g. planting altering the level of the water table, therefore affecting archaeological remains in waterlogged areas.	Agreed. Finalised SFS refers to relevant Guidelines and UK Forestry Standard in order to ameliorate this.
	Outcome 3 ‘increasing diversity of farmed landscapes / wood fuel sector promotion’ could also have adverse effects as referred to in assessment but not summary.	Agreed.
	Potential negative impacts on cultural heritage of Theme 1 Climate change – should have been noted in summary discussion	Agreed. Forestry sector climate change action plan should take this into account.
	Theme 2 Business Development could have adverse effects on the historic environment, which could be mitigated through archaeological survey prior to woodland expansion.	Noted. Finalised SFS refers to relevant Guidelines and UK Forestry Standard. FCS is unable to commit to undertaking archaeological survey of unknown / non-designated cultural heritage prior to expansion. Close liaison with archaeological interests will be required to minimise conflict.
	Theme 4 could provide benefits – a woods for lifelong learning strategy	Agreed. This has been emphasised in introductory text relating to Key Theme 4 Community Development.
	Indicators do not provide information on the effects on the historic environment from the SFS	Indicators within finalised SFS now include reference to Scheduled Ancient Monuments (SAMs) and the National Monuments Record for Scotland (NMRS) as agreed with Historic Scotland.
Scottish Environment Protection Agency	Wording of objectives could have been improved to provide a consistent and robust assessment.	Agreed – although it is envisaged that amended wording of the objectives would not have led to the identification of any further impacts. Will be taken into account with SEA of FDSPs as far as possible.
	Proposals in Appendix H should be taken into account as the SFS is finalised	Noted and referred to in review of indicators as far as possible – balanced with wider commitment to keeping indicators clear, easy to monitor and affordable.
	Appendix A should have take into account additional plans – SCCP, SPP6, NTS, L/RTSs, National Sludge Strategy and IFSS	Noted. These were omitted from the contextual analysis in the SEA, but have been taken into account within the preparation of the SFS itself.

CONSULTEE / RESPONDENT	SUMMARY OF COMMENTS	HOW THE COMMENT WAS TAKEN INTO ACCOUNT IN MAKING THE DECISION TO ADOPT THE FINAL PLAN/PROGRAMME
	Unclear whether suggested datasets have been used in the assessment.	<p>Some of the datasets have been referred to, specifically in relation to water quality at the River Basin Management Plan level, given the national focus of the SFS.</p> <p>An alternative source of air quality information was used in the baseline assessment: the National Atmospheric Emissions Inventory (NAEI).</p>
	Sewage sludge use for forestry not covered	It is acknowledged that this could have been addressed more specifically, although the revised SFS does promote 'green technology'. There should be opportunities to develop these links further at the FDSP SEA level. Further national guidance on the use of sewage sludge in forestry is expected and this subject will also be covered by the Executive's forthcoming General Binding Rules for Diffuse Pollution (currently out for public consultation).
	Lower tier plans and SEA should be explained	Noted – The SEA of FDSPs is now progressing and this should lead to a much clearer, and more consistent, future relationship between the SFS and FDSPs.
	Suggest possible addition of specific indicators to assess proposed mitigation measures	<p>Noted and borne in mind during review of indicators. Based on this and the findings of the SEA itself, together with wider stakeholder consultation, the revised SFS has a number of additional, specific indicators, including:</p> <ul style="list-style-type: none"> • Improved indicators relating to climate change: e.g. annual net carbon savings and installed capacity of wood energy plant • Improved social indicators, including number of schools involved in learning activities, number of community group partnerships and more detailed access indicators • Improved biodiversity indicators relating to ecological quality of rivers in forested catchments, use of low impact silvicultural systems etc.
Scottish Natural Heritage	Make reference to FES and role in relation to SFS	Noted – The SEA of FDSPs is now progressing and this should lead to a much clearer, and more consistent, relationship between the SFS and FDSPs in the future.

CONSULTEE / RESPONDENT	SUMMARY OF COMMENTS	HOW THE COMMENT WAS TAKEN INTO ACCOUNT IN MAKING THE DECISION TO ADOPT THE FINAL PLAN/PROGRAMME
	Acknowledge 2006 Review of Scotland's National Forest Estate	Noted – was undertaken in 2004 and is referred to in text. The later Environmental Review (2005/2006) and FCS response have not yet been published. However, this is likely to refine, rather than change, the environmental directions referred to in the SFS
	Acknowledge geological interests	Revised SFS now includes references to geodiversity and notes statutory duty to balance timber production with environmental issues.
	Take into account condition of Sites of Special Scientific Interest (SSSIs) as well as extent – related with this favourable condition target should be taken into account within indicators. Consider effects on non woodland habitats (referring to Habitat Action Plans {HAPS} and Species Action Plans {SAPs})	Favourable condition target noted under Theme 7 and in relation to indicators and targets (under Section.3.4) (Reference now made to HAPs and SAPs under Theme 7.
	Lack of distinction between policy and delivery with regard to biodiversity, flora and fauna	References to HAPs and SAPs should assist with this
	Make reference to aquatic species and habitats	Referred to in relation to Nitrate Vulnerable Zones but also as an underlying assumption within sustainable forest management (linked to Guidelines and the UK Forestry Standard).
	Key indicators should include targets identified in terms of achieving favourable condition of designated sites	Not specifically adopted within revised SFS, although improved biodiversity indicators were included following comments on the first draft. The overarching Scottish Executive target of bringing 80% of the special features on Scotland's nationally important nature sites into favourable condition by 2008 is included in the Executive Summary as well as the Implementation Section (3.4).
	Touch on access for all, Disability Discrimination Act (DDA) and access to wider areas	Key purpose of Theme 2 (Access and Health) is now to make access to woodlands easier for all sectors of society. This includes action points relating to land reform and the Scottish Outdoors Access Code. Reference is now made to DDA within revised SFS
	Refer to climate change implications for biodiversity including problems for Forest Habitat Networks (FHNs)	Revised SFS now makes specific reference to FHNs within both the Climate Change Theme and the Biodiversity theme. The implications of this, and opportunities for adaptation arising from it will be highlighted in the subsequent forestry climate change action plan.
	Refer to impacts from trampling and grazing by deer	This is now noted under Theme 7 'Biodiversity'

CONSULTEE / RESPONDENT	SUMMARY OF COMMENTS	HOW THE COMMENT WAS TAKEN INTO ACCOUNT IN MAKING THE DECISION TO ADOPT THE FINAL PLAN/PROGRAMME
	Refer to importance of conserving genetic integrity of native populations in environmental problems section	References to genetic conservation of woodland now included in revised SFS
	Objectives should refer to reversing habitat fragmentation and isolation	Now noted under Theme 7 'Biodiversity'
	Reference to deer management too narrow. Refer to Joint Agency Statement (JAS) on deer management. Proposed mitigation could address wider issues in terms of biodiversity conflict	In the Biodiversity Theme, exemplary and collaborative deer management, following the Deer Commission for Scotland's Best practice Guidance, assumes incorporation of the JAS. This will be confirmed in the subsequent Biodiversity component of Implementation Plans.
	Reflect enhancement in relation to climate change adaptation	References to adaptation / enhancement included under Theme 1 Climate Change
D. G Mackay	Environmental Report difficult to assimilate. Complacent and naive. Insufficient monitoring. Responsibility should be one step removed from FCS	Noted. FCS has tried to address this through the Implementation Plan process, with advice from the Scottish Forestry Forum and annual reports to be posted on FCS website.
Brian Ballinger	Summary is too vague and just repeats Themes from Strategy	Noted.
Macaulay Institute	Requirement for further guidance on striking an appropriate balance between competing objectives	The preparation of the SFS has sought to strike a sustainable balance within the forestry sector and the SEA raised no significant issues as a result of the proposed approach. Appropriate balance will be considered further at local level and is always underpinned by UK Forestry Standard.
James Fenton	Disagrees that most of the strategy's policies will "support biodiversity, flora and fauna".	The SEA noted no significant adverse impacts on biodiversity, and found that biodiversity policies and proposals within the SFS recognised and responded positively to most of the biodiversity issues raised during consultation. Compliance with the UK Forestry Standard as well as statutory duties for FCS should lead to balanced delivery of social, economic and environmental functions at a strategic level. Conflict resolution, if it arises, can only be achieved at local level (where good consultative arrangements are already in place).
Scottish Rights of Way Society (ScotWays)	Environmental Characteristics affected by SFS, para 2: unless prescribed statutory processes have been followed alternative routes must be provided and clearly way-marked - at suitable geographic locations (not just when you get there). Promulgate throughout SFS.	Point noted as best practice. This is a detailed implementation issue. The generality of the comment has been addressed as a priority action in Key Theme 5, Access and Health.

CONSULTEE / RESPONDENT	SUMMARY OF COMMENTS	HOW THE COMMENT WAS TAKEN INTO ACCOUNT IN MAKING THE DECISION TO ADOPT THE FINAL PLAN/PROGRAMME
Dumfries and Galloway Council	Very detailed, balanced and thorough. Main Report (Sections 3,4,5) would have been easier to digest with improved presentation (further information and assessment in table/bullet format + illustrations).	Noted.
Scottish Council of National Parks	No risk assessment of SFS's capacity to deliver some of the targets e.g. negative scenarios (uncertain delivery by partners/community bodies; limited resources etc) as well as positive scenarios set by the SEA	FCS undertook a Risk Assessment of targets against available resources prior to finalising the SFS. This highlighted the need to separate long-term directions (aspirations) from shorter-term delivery actions (linked to Spending Reviews etc).
British Association of Shooting and Fishing	<p>No mention of forestry intrusion on heather moorland in past, or reference to associated loss of red grouse</p> <p>Highlight downward trend of visitor numbers to woodlands</p> <p>Deer management should not automatically be regarded as a policy challenge but rather an issue requiring greater consideration.</p>	<p>Agreed that loss of heather moorland has been a problem in the past. Key theme 7 notes importance of open ground habitats in addition to woodland resources.</p> <p>Issue has arisen as a result of use of varying datasets. Clearer reference now provided in Appendix 2 of revised SFS.</p> <p>Agreed. This has been acknowledged within the Finalised SFS.</p>
OPENspace	Lack of focus on designed landscapes and the important role that forestry plays within designed landscapes and that design plays within forested landscapes. Landscape Character Assessment not mentioned.	These points have been addressed within the finalised SFS.
Association for the Protection of Rural Scotland	Concerned that the contribution of tree-cover to the outstanding scenic heritage of Scotland is included as an afterthought in the summary document.	Addressed in Key Theme 6, Environmental Quality.
Council for Scottish Archaeology	Landscape Section makes no reference to Historic Land-use Assessment	Now explicitly referred to in the text. HLU Assessment will also be referred to in SEA of FDSPs
British Geological Survey	No mention of geodiversity	Now specifically referred to in revised SFS text.
LINK Woodland Task Force and RSPB	Fails to address the UK Forestry Standard issue in Tier 2 and 3 of LMCs	UKFS does apply to Tiers 2 and 3 of LMCs. Action point for FCS to raise awareness of this.

CONSULTEE / RESPONDENT	SUMMARY OF COMMENTS	HOW THE COMMENT WAS TAKEN INTO ACCOUNT IN MAKING THE DECISION TO ADOPT THE FINAL PLAN/PROGRAMME
Gilbert Milne	<p>Emphasise importance of cultural heritage features etc. and need for greater environmental commitments from agricultural and forestry sector.</p> <p>Suggest gradual but total removal of Sitka spruce (e.g. pine weevils and permethrin and risk of monocultures). Money could have been spent so much more wisely on sustainable employment than through SS.</p> <p>Put an end to "guilt strips" round SS forests.</p> <p>Do not plant native trees on industrial template (serried ranks).</p>	<p>Cultural heritage (historic environment) has been given greater prominence in the finalised SFS. Forestry's environmental commitments are clear and balanced with social and economic considerations.</p> <p>Consultation did not indicate widespread support for the removal of Sitka spruce. Emphasis is on having the right trees in the right places for the right reasons. The key for the future is to harness the benefits of Sitka spruce, correct any negative legacies, and continue to expand the much broader public and economic benefits of forestry for Scotland.</p> <p>The edge strips practice was discontinued long ago.</p> <p>Planting systems for native trees should reflect management objectives and the closer these are to 'naturalness' the greater the need to vary the spacing of the trees.</p>
Maurice T Rogers OBE	Environment is just one aspect of forestry.	Point taken but the Environmental Report forms a part, not the whole, of the SFS assessment process. An appropriate balance between the social, economic and environmental aspects of the Strategy was tested through the wider consultation process.
Kincraig and Vicinity Community Council	Environmental considerations are being given undue weight. Should consider social and economic factors in balance with environmental factors	Point taken but the Environmental Report forms a part, not the whole, of the SFS assessment process. An appropriate balance between the social, economic and environmental aspects of the Strategy was tested through the wider consultation process.
A F Shankland	Hope that during implementation the inevitable compromises made with various partners and contractors will not adversely affect the long-term environmental aims.	Consultation at local and regional level will provide good checks and balances. Annual consideration of Implementation Plans, with advice from the Scottish Forestry Forum, will give further comfort on this point.

Changes to the SFS arising from wider consultation

Table 7.2 below summarises the main comments received on the draft Scottish Forestry Strategy, and sets out how they were taken into account in finalising the Strategy. Individual responses can be viewed, on request at the address shown in section 3 of this Post-adoption Statement.

Table 7.2 Main consultation comments about the draft Scottish Forestry Strategy and Forestry Commission Scotland’s response.

CONSULTATION COMMENT	RESPONSE
Broaden the title to include trees and woodlands as well as forests.	We understood the desire to make the title more inclusive. However, on balance we felt retention of the existing title would provide continuity between the Scottish Forestry Strategy (SFS) 2000 and the 2006 revision. The term “forestry” embraces trees, woodlands and forests although we also considered the addition of a “strap-line” to see if this would add value to the title (it didn’t).
The draft SFS was too complex.	We simplified the layout and content of the document. In particular we moved the “Context” chapter to the Appendix and improved the “flow” of the Key Themes.
Too verbose and turgid.	Further editorial work helped address this point.
Tries to be all things to all people.	A very broad range of benefits flow from forest management and one of the strengths of forestry is its ability to perform a multi-functional role. However, we identified <u>priority</u> actions within each Key theme.
Is it the role of the SFS to scroll down to the level of individual trees or clumps of trees?	Where individual trees or clumps of trees have strategic importance (for instance “Heritage” or veteran trees) we felt it was appropriate to include them in the Strategy.
Too people-focused (anthropocentric).	We recognised that many of the environmental benefits of forestry are important in their own right. However, we also felt it was important to relate those benefits to people, either directly (e.g. enjoyment) or indirectly (e.g. funding requirements). We sought to clarify this in the text.
Time-scales too short.	In seeking to establish the immediate relevance of forestry we accept that the long-term nature of it had been understated. This was rectified in the revised text.
Interchangeable terminology has caused some confusion, particularly on – historic environment/cultural heritage; native woodland/native species; and woodland/forests/ plantations.	This was a valid point and we sought to clarify this and retain consistency throughout the document. However, we felt that the distinction between forests and woodland was simply an artificial “construct” and that they should remain interchangeable. On the other hand we accepted that “plantation” had a narrower definition. The Glossary reflected our definitions.
Lack of evidence base.	To keep the Strategy concise the web-based Context paper and the Forestry Commission Scotland (FCS) web-site (with links to other sites) have been treated as the primary validation resources.
An overall land-use strategy is required rather than a collection of sectoral strategies.	We recognised the point being made. Mechanisms such as the Rural Development Programme for Scotland 2007-2013 indicate a more integrated approach to land-use matters. However, the SFS extends beyond land-use and we highlighted this in diagrammatic form in

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	Appendix 2.
Linkage with the Scottish Rural Development Strategy/Programme and the Forward Strategy for Scottish Agriculture is not good.	The linkage between the SFS and these strategies was closer than ever. No associated, major changes to the text were made.
The SFS includes tactical as well as strategic detail.	We recognised the tension between a delivery plan and a strategic plan. We sought to remove tactical details from the text and added a section outlining the intention to develop an Implementation Plan following the launch of the Strategy.
Emphasis should be on existing woods rather than new woods – e.g. better management via thinning and emphasis on quality.	We believe both are important. We dealt with planning and forest management issues in the generic Delivery section.
Weak on “delivery”.	We recognised this point and revised the Delivery chapter accordingly.
Uncertain about what the SFS requires people to do .	We revised the Key themes to ensure that required actions followed-on smoothly from the “Purposes” of each theme.
Each Key theme should have “How”; “By whom”; and “Cost” sections.	<p>Following this feedback we piloted the addition of “How” and “By whom” sections. However, these confused, rather than clarified, the strategic key purposes of the SFS and led to significant repetition. However, we added to a revised Delivery section to outline the main delivery partners at a strategic level.</p> <p>As a strategic document, with potential funding from a range of budgets outside Forestry Commission Scotland’s direct control, we felt it would be inappropriate to prescribe “Costs”. The intention is to indicate the direction of travel rather than scroll down to a tactical level of detail.</p>
Rationalisation of Key themes.	We were persuaded by the arguments in favour of some rationalisation, re-naming and grouping of Key Themes.
Lack of prioritisation. How will conflicts be resolved? (100 headline action points)	We recognised this point and highlighted priorities for each Key Theme. However, conflict resolution will be a local or regional matter as the relative importance of objectives will vary across the country.
Insufficient/inadequate targets and indicators.	A balance needed to be struck between aspirations and targets. We believed the Strategy should set out the direction and the broad pace of travel, with sufficient Indicators to describe progress. However, the subsequent Implementation Plan will set objective, time-bounded targets aligned to resource availability. At both the Strategic and the Implementation level we are committed to an open and transparent reporting process.
Scottish Executive’s economic imperative was not reflected in the draft SFS.	The draft Strategy aimed to deliver sustainable economic growth on a range of fronts, not solely timber. However, the Executive’s top priority of sustainable economic growth has been given more attention in the revised text.
Major gap between aspirations and current resources. The draft SFS indicated a need for greater public spending	The Strategy is intended to be an aspirational document. Resource limitations are a fact of life and these will be reflected in the detailed, shorter-term targets included in the proposed Implementation Plan. In the medium- to longer-term a function of the Strategy is identify where we would like to be and that might indeed indicate a desire for

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at a time of potentially reducing resources.	more or different resources.
Have potential partners agreed their roles?	FCS has a good working relationship across a very broad range of current and potential partners and is confident that the Strategy will add to the synergies that already exist. However, it is intended to be an aspirational document, serving as a basis for continuing discussions with existing partners and a catalyst for forging new relationships with other players. By its nature it needs to allow for opportunism.
There should be greater emphasis on working with partners, e.g. health sector.	We agree there needs to be a strong emphasis on working in partnership and we reflected this when revising the text.
Insufficient alignment with the Planning process.	We strengthened this component of the Strategy.
Insufficient attention to research.	We strengthened this component of the Strategy.
<p>The respective roles of the UK Woodland Assurance Standard (UKWAS) and the UK Forestry Standard is unclear.</p> <p>Particular (potential) concern was expressed about Land Management Contract Tier 2 payments not being required to conform to the UK Forestry Standard.</p>	<p>We clarified these roles.</p> <p>All publicly funded forestry in the UK is required to meet the UK Forestry Standard. This was clarified in Appendix 2.</p>
Level playing field required with agriculture.	We recognised the point being made and consider that the direction of travel is headed that way. No changes to the text were made.
Level playing field required between the national forest estate (managed by FCS) and the private sector.	The broad principle is that FCS will seek best value for the Scottish Executive via a range of delivery mechanisms. With 35% of the woodland area in Scotland, the national forest estate currently receives some 35% of the cash resources allocated to forestry by the Scottish Executive. In addition Scottish Forestry Grant Scheme support for the non-state sector is growing at a much faster rate than for the national forest estate. No changes to the text were made.
Too FCS focused.	We took this comment on board although one of the purposes of Forestry Commission Scotland is to take a lead role. We clarified that this is a Forestry Strategy for <u>Scotland</u> and we also clarified the roles of the various forestry sectors.
<p>a) Clarify role of national forest estate.</p> <p>b) Issue of the national forest estate as a competitor (e.g. in recreation provision) rather than a facilitator.</p>	<p>The Delivery section was revised to clarify the purpose and 'direction' of the national forest estate.</p> <p>This point was addressed by comments made for a).</p>

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c) Uncertainty (and concern) about how the composition of the national forest estate will change to 40% native woodland.	The longer-term vision was re-worded.
Abolish FCS.	There have been many different, conflicting views on this. It will be a matter for Ministers to consider.
Confidence issue (lack of) within private sector and industry.	We fully recognised the need to take people with us. Without the support and confidence of woodland owners the full benefits of forestry will not be realised. Revisions to the text helped address this issue.
Surprise at extent of the social agenda, particularly health and education. Questions about forestry's "competence" to be involved in this arena.	State support for the forestry sector is conditional on it achieving significant public benefits. One area in which it can certainly do so is the social agenda. An aim of the Strategy is to increase forestry's <u>contribution</u> to that agenda, guided by the competent authorities. Some minor text changes helped to clarify this.
Strong concern about the negative slant given to non-native conifers and private woodlands.	We did not wish to create such an impression, although neither should we ignore the environmental issues caused by some of the forest design and operational practices of the past (both of which apply as much to the national forest estate as they do to non-state forests). Some minor text revision helped to clarify this.
Concern expressed at moving too far towards a "service" economy (balanced by concern that it is has not moved far enough).	It is a matter of judgement where the balance should lie. We accept that the direct economic benefits of forestry are substantial and that new developments, such as wood fuel and sustainable construction, offer significant opportunities to enhance the economic performance of forestry in Scotland. The revised text accommodated this point.
Insufficient attention to timber aspects.	This was a matter of widespread concern, and not just from "industry". There were, however, converse concerns. With timber's unique environmental credentials we did not wish to underplay its significance and role in the Strategy, and this was reflected in the revised text.
Concerns about 8-8.5 m m3 sustainable yield – derivation, level and achievement.	We believe there is a need for a predictable and consistent supply of timber. Preliminary investigations showed that the figure of 8 –8.5 m m3 per annum is achievable, with opportunities for further growth. However, a group, including representatives from the forestry sector, will examine the role of the market, incentives and the national forest estate in achieving the "smoothing" of timber production. It will also assess what further information is required to validate the growing-stock data. Text changes addressed this point.
Strong concerns that the "productive" area of forests is being reduced significantly.	We accept that if timber production is to be "smoothed" and increased then the productive timber potential of forestry in Scotland must be maintained. This will require a mix of area and productivity considerations (land quality and genetic gain) and a mix of market-led responses and incentives. This was clarified in the revised text.
Concern that there has been too much focus on Carbon sequestration.	Forestry's contributions to climate change issues are set out in Scotland's Climate Change Programme. Carbon sequestration is part of that commitment. We agree that product substitution (e.g. in sustainable building construction or for energy) and adaptation are of particular significance to the way in which forestry can help address climate change considerations. No major changes to the text were required.

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Concern that environmental targets are not sufficiently challenging, particularly on Plantations on Ancient Woodland Sites (PAWS), native woodland expansion and accessibility targets.	As with timber, there were also converse concerns that the environmental targets were <u>too</u> ambitious. A judgement needed to be made on priorities within current resources, coupled with our longer-term aspirations for a balanced, sustainable forestry sector. As described in earlier comments we revised the text so that tactical issues can be taken forward in the proposed Implementation Plan, leaving the Strategy to indicate the broad direction of travel.
Concern about expansion on to better agricultural land.	The Land Management Contracts (LMC) process, coupled with an even closer relationship between members of the Executive's Environment and Rural Affairs Department 'family' (which includes Forestry Commission Scotland), as part of the On the Ground programme, will strengthen integrated decision making and integrated support for land management. Minor text changes addressed this point.
Expansion targets to be broken down – particular need to identify “commercial expansion”.	The most important task is to encourage the right trees, in the right places for the right reasons and there are systems already in place to guide this process. The latter will be aided by the work done on the Commission's behalf by Macaulay Research Consultancy Services and Forest Research. The Strategy will give strategic guidance, but tactical delivery and targets will be addressed through the proposed Implementation Plan.
Require spatial feel to expansion targets.	We believe we should be focusing on outcomes rather than prescribe on an area basis. Indicative Forestry Strategies/Woodland Frameworks, and an increasing focus on regional forums will guide this process. No significant changes to the Strategy were made.
Clarify the “mechanics” of species changes in private/state woodlands.	In revising the text we clarified this point.
Request that grants should be made conditional on UKWAS certification by 2010.	UKWAS is a voluntary certification scheme. However, there is a commitment to encourage the uptake of credible certification of forest management in Scotland. Support for certification schemes is currently under discussion as part of LMC considerations. In addition, over the next 5 years it is the intention to strengthen the link between forestry grant payments and long-term forest plans. The latter will make a significant contribution to the delivery of UKWAS principles. Text revisions clarified this.
Request for higher standards to be required in National Parks.	The UK Forestry Standard sets the criteria for sustainable forest management across the UK, but consultation, at scheme level, will also take account of the special qualities of National Parks. We accepted the need to give more explicit reference to forestry in National Parks.
Suggestions that diversification of forests should be through afforestation rather than changing the composition of existing forests.	Both mechanisms are required to fulfil the range of objectives in Scottish forestry. No change to the text was made.

FCS concluded that no significant changes were made between the draft and finalised versions of the SFS, that would lead to a requirement to produce a revised Environmental Report.

SECTION 8 REASONS FOR CHOOSING THE SCOTTISH FORESTRY STRATEGY AS ADOPTED, IN THE LIGHT OF OTHER REASONABLE ALTERNATIVES

The consideration of alternatives undertaken during the SEA and the preparation of the SFS, including feedback from the first consultation, influenced the shape of the final policy document. In response to the second public consultation feedback, the draft SFS was revised in a number of ways to strengthen and clarify policy aims and objectives and to ensure an appropriate social, economic and environmental balance was struck.

With regard to the specific alternatives explored during the SEA process, it was concluded that the finalised SFS represents each of the potential policy 'drivers' as far as possible, and in a sustainable way. As demonstrated in Table 7.2 above, the consultation process also allowed for competing priorities to be rigorously discussed and tested in relation to one another. FCS proposes that the finalised SFS therefore strikes as sustainable a balance as possible between environmental, social, economic and community priorities and aspirations.

SECTION 9 MEASURES THAT ARE TO BE TAKEN TO MONITOR FOR ANY UNFORESEEN ENVIRONMENTAL EFFECTS SO THAT APPROPRIATE REMEDIAL ACTION MAY BE TAKEN

The primary mechanism for monitoring the impacts of the SFS will be through the existing, effective channels for two-way communication with our wide range of stakeholders. Following consultation undertaken for the SFS, the proposed indicators for monitoring the strategy were adjusted, and priority indicators were identified. Establishing baseline data against these indicators will be a key objective in the SFS implementation Plan 2007/2008.

Annual reporting against the Implementation Plan will be undertaken, with the report being posted on the FCS web site. In addition, there will be 5 yearly consideration of the need to review the SFS. Throughout this process, advice will be sought from the Scottish Forestry Forum and the Regional Forestry Forums, all of which have a wide and balanced representation across the social, economic and environmental sectors.

SECTION 10 CONCLUSION

We believe the SEA process has been of significant help in developing a balanced Scottish Forestry Strategy. This, in turn, will ensure that forestry in Scotland will emerge as an exemplar of sustainable development, benefiting the people of Scotland and protecting and enhancing the environment during the era of climate change.