

Jim and Rosemary Green

Liz Kirk
Forestry Commission Scotland
Silvan House
231 Corstorphine Road
EDINBURGH
EH12 7AT

20th January 2009

Dear Ms Kirk,

Consultation on forestry provisions in the Scottish Climate Change Bill

With regard to the first proposal in this discussion document I am writing to confirm that we are in favour of the Forestry Commission participating in joint renewable energy programmes on the national forest estate. We believe that such projects could make a significant economic and environmental contribution towards a low-carbon economy. It is not clear whether they would be agreed for all areas of the state forest including woodland leased out to private timber companies but our preference is that they should be targeted towards poorer-quality plantations which currently possess limited economic, wildlife and amenity value.

With regard to the proposed leasing and cutting rights within the state forest we have the following comments:-

- a) although there has been considerable comment, Ministerial and otherwise, around the terms of the consultation paper the document itself is non-specific and lacking in important detail with regard to timescales, economics, lease conditions and proposed localities. Consultees are being asked to sign up to a principle without a clear idea of its implications. They are also not being given an opportunity to express their views on the limits to which the principle should extend.
- b) if the verbal suggestion of a 75 year forest lease is accurate the next two generations of Scots will effectively have seen a state asset privatised – a situation which must raise doubts about the long term status of this asset. These doubts are accentuated by the proposal in the consultation paper that a not-for profit trust could sell any newly generated woodland rather than retain it within public ownership.
- c) an upfront payment for extended leasing rights will inevitably err on the low side of true value and will be achieved at the cost of taxpayers' money, future profits, future grant aid for replanting and the cost of establishing a new managerial organisation. Furthermore, the suggested £200 million which might accrue from a 75 year lease is insufficient to grant aid more than a portion of the new planting which is necessary to achieve the proposed 25% woodland cover in Scotland by 2050. Meanwhile leasing arrangements would continue to operate for a further 35+ years to 2085 or beyond.
- d) Whilst £200 million will not cover the total planting requirement up to 2050 the expenditure necessary to make up the perceived deficit of c.5000ha of new woodland

per annum appears to be no more than £10-12 million; a rather small figure for such an extended and controversial commitment of public assets.

e) The consultation paper confirms that current amenity and biodiversity commitments would be safeguarded under any new leasing arrangements. Whilst this is welcome such commitments are not fixed in stone. In particular, the biodiversity scenario is certain to alter as climate change gathers pace, necessitating targeted responses from administrators in respect of their commitments to protected species and the like. In recent years the Forestry Commission has shown that it possesses both the flexibility and the will to perform such actions but this has been less evident within the private organisations. There is also much that can be done within so-called commercial state forests to improve their existing biodiversity status. Consequently, we feel that proposed leases would relegate the biodiversity potential of such habitats to the second rank for the foreseeable future.

For all of the reasons stated above we are not in favour of the proposal to lease out rights over parts of the national forest estate.

Yours faithfully,

Jim and Rosemary Green