

From: Fenning, Trevor
Sent: 06 November 2008 15:36
To: liz.kirk@forestry.gsi.gov.uk
Subject: Response to the Consultation on forestry provisions in the Scottish Climate Change Bill

Dear Liz Kirk,

What follows are my personal views on this matter, and not necessarily those of my employer (Forest Research), but I do have many years of experience elsewhere in the forest research field, including in climate change studies, so my views do have a scientific foundation. I also attach some of my recent publications that lend weight to my statements here*.

1. Globally, the problems that are affecting forests are probably contributing rather more than 18% to total carbon emissions. It is possible to say this with confidence because (i) the actual emission data are very uncertain, as it is not possible to measure them directly and the 18% figure is an overly conservative estimate of what is known to be occurring, partly because (ii) this number does not include emissions that fall under the heading of 'land use changes', such as the direct conversion of forest to agriculture (for instance); and lastly (iii) 'non-fossil fuel' emissions measured in the atmosphere seem to be increasing rapidly, both in absolute terms and as a percentage of the total. Increases in forest disturbance in the tropics is the main suspect.

2. An exception to this gloomy view, is that the forests of Northern Europe and America, have been 'in recovery' for much of the last century from previous over-exploitation, and have been identified as major carbon sinks - and it has been estimated that they have already reduced the net increase in atmospheric carbon by ~20% from what would have been expected otherwise. The activities of the Forestry Commission have made a significant contribution to this, especially in the UK context of course and most of all in Scotland. The downside being that some countries which have scaled back their own forestry operations, have often ended up compensating by importing more wood from elsewhere, with the result that the problem has merely been 'exported' and so negating any local environmental benefits that they might have achieved. The Scandinavian example is often quoted - which is a pitfall that I hope that Scotland can avoid repeating.

3. Given that FC-Scotland has already made a significant contribution to reducing Scottish net carbon emissions, and is hoping to do even better in future obviously, then disabling this effort at a critical time for climate change remediation (which as it stands, this proposal undoubtedly will), in order to generate funds for other projects of uncertain future value that one just hopes will equal or exceed that achieved by the FC's work, seems risky at best and quite possibly counter-productive in terms of the overall objective i.e. reducing Scotland's net carbon emissions by 80% over the next 40 or so years. Don't get me wrong, some of these other schemes (whatever they are) might be worth having too - but 'Robbing Peter to pay Paul' in order to get them funded does not seem a sensible way to go.

4. There may well be an argument for selling off FC's commercial forestry operations, so as to leave the FC free to provide independent forest owners with the services that they require as well as fulfilling its other statutory and regulatory obligations, but in that case the entire way that the FC is organised and funded will need to be addressed first. This is not a small issue, and I don't see anything that even hints at addressing that within this consultation document. Such a large policy change would need to be thought about very carefully first and preferably be implemented in a coordinated way across the whole of the UK, especially given the long lag times between actions and consequences in the world of forestry. Errors made in the short term such as

this, might take a very long time to correct, and this seems to be an unnecessary risk to take, if Scotland is serious about achieving its stated carbon emission reduction targets.

* Note that the publication details of the Word document are as follows
: Fenning, T.M. and Gershenzon, J. (2003). Perspectives and prospects for forest biotechnology in Europe. In: Sustainable Forestry, Wood Products & Biotechnology. Eds: Barredo, Y., Espinel, S., and Ritter, E. D.F.A. Press, Vitoria-Gasteiz, Spain. pp 131-136.

Yours,

Dr Trevor Fenning.

FR-NRS, FMD.

6th November 2008.