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24 January 2009

Liz Kirk
Forestry Commission Scotland
Silvan House
231 Cortisorphine Road
Edinburgh
EH12 7AT

Dear Ms. Kirk,

Consultation on Forestry Provisions in Climate Change Bill

I settled in Scotland some 7 years ago to work in the forest industry after retraining as a forester following many years working in private environmental consultancy in England. Since arriving I have gained first hand experience of private, trust and public forestry and become actively involved in Forestry organisations such as the Royal Scottish Forestry Society and Forest Education Initiative.

I chose to move to Scotland as the reputation of her forestry far outweighs that of any other part of the UK- a standing I have come to appreciate she has gained from the exemplary work of Forestry Commission Scotland.

I was interested to read how the otherwise very desirable Climate Bill proposes to deal with one of Scotland's greatest assets, its public forests, which under recent enlightened policies have concentrated on wider than purely commercial benefits.

I have strong reservations over the proposals to lease up to a quarter of the National estate. I don't believe this action would achieve the benefits the Minister states it will, given the difficulties all are having in acquiring new land for planting and the well documented challenges of the Scottish Rural Development Programme. I fear it will, instead, have irreversible detrimental effects on: the health and well being of the people of Scotland; the timber industry in Scotland; the future of National Forest Estate and Forest Enterprise Scotland (FES); the reputation of Scottish forestry globally; and ultimately the reputation of the Scottish Government.

At this time when the lessons for the British economy of selling so much of our industry and assets to foreign private interests are being so painfully learnt, it is both surprising and disappointing that the Scottish Government should be contemplating action along the same lines. Selling off a substantial proportion of the Forestry Commission's Scottish estate (75 year leases is tantamount to the

same thing for most people alive today) would have devastating effects on the Forest Industry and the future of FES.

The refusal to ring fence the money raised from the leases for new woodland creation is also worrying. It signifies that the assets of the Public forest could simply be absorbed to fund other initiatives set out within the Bill.

Moreover, deprived of income from its most productive assets, FES would be less effective in delivering multi-purpose forestry in the remainder. Michael Russell has stated that the proposals would not affect the rest of the organisation, but, how plausible is this statement given the obvious funding gap this would create? As well as loss of finance there would be the loss of facilities and expertise. For example, a 25% loss of staff would affect all sectors of the organisation including the professional support staff that spread their expertise across Scotland. FES benefits greatly from these highly qualified, in-house professional support staff. To gain this expertise from private sector consultants would be financially crippling.

All is being proposed to combat climate change. However a very real negative impact would be the increase in mileage (and carbon emissions) as FES staff covering the areas of leased forests would have to travel further to reach the remaining public woodlands.

I regard these proposals as misjudged. They take money and land from an organisation that invests in significant public benefits and gives it to the private sector who have a well documented track record of planting woodlands chiefly for profit rather than diversity, tolerating rather than promoting public access and underpaying their overworked staff. Indirectly contrast FES is recognised by auditors of the UK Woodland Assurance Scheme to go over and above the standards required for certification.

I also have serious reservations over the method being used to assess which woodlands are chosen for the leasing scheme. The scoring method was developed for the purposes of 'repositioning' and does not assess the forests in a thorough or foolproof way. Items, such as their value in the landscape, were seriously underscored. These criticisms were acknowledged at the time of the repositioning assessment but accepted as it was seen as a guide only, to be scrutinised further if disposal was proposed. Now, however, there are no such safety nets.

Whatever theoretical safeguards are put in place at the onset to secure staff and ensure forestry standards are upheld in the leased forests, experience suggests that these would be quickly watered down or forgotten.

As such, I have no option but to respond to this consultation on proposals that if adopted will rock Scottish forestry to the core and have irreversible detrimental effects on the woodlands themselves and the timber industry in Scotland.

In direct contrast to the proposals to lease the forests the proposals to allow the Forestry Commissioners to enter into joint ventures is highly desirable and long over due. The experience of the joint venture with the Caravan Club and Forest Holidays demonstrates that these arrangements work and make best use of the public estate for the benefit of the Scottish people. The income gained could be ring-fenced for appropriate new woodland establishment.

So, my answers to the questions posed are as follows:-

1. I would support the proposals to allowing the Forestry Commissioners to enter into joint ventures as proposed
2. I object strongly to the proposal to offer leases and cutting rights over part of the Forestry National Estate.
3. As I object to question 2 proposals, the question of transferring these proceeds should not arise.
4. I second the proposals suggested by the FCTU joint response. I would add that we need to rethink the nation's attitude towards tree planting and retention. Significant and worthwhile tree planting (planted and maintained by foresters) needs to become a requirement through the planning process for all new developments from housing schemes to retail, road and commercial developments. I also believe we should all be paying a carbon tax proportional to the amounts generated. The funds raised should be used for tree planting and other projects to reduce the effects of climate change. I acknowledge that this is a bitter (but essential) pill to swallow.

Times have greatly changed since the public forests were first established as a strategic reserve, however, in these uncertain times we should not be thinking of selling our forest resource to foreign private investors. I believe we could now be approaching a time when we will truly benefit from the forward thinking approach of the founders of the Forestry Commission.

I trust that results of this public consultation will be taken seriously.

Yours sincerely,

Renate Jephcott
Forestry Landscape Architect