

Consultation on forestry provisions in the Scottish Climate Change Bill

Reforestation Scotland welcomes the opportunity to contribute to this consultation, as it does raise some important issues about our national response to climate change and forest policy. It is time to think radically and we do want to see more tree-planting in Scotland. On behalf of the Board of directors of RS, we would like to submit this response compiled by David Blair

Question 1: What are your views on allowing the Forestry Commissioners to enter into joint ventures, with the intention of participating in renewable energy programmes on the National Forest Estate?

We support the proposal to introduce new legislation to allow the Forestry Commission to participate in renewable energy joint ventures. For large scale schemes in remote areas of Scotland it is appropriate that these joint ventures are with the private sector but in rural areas, where there is a community present, the joint ventures should involve that local community. There is great potential for multiple micro-hydro, community scale wind energy and wood-fired combined heat and power (CHP), but it is the local community who is best placed to monitor and maintain these developments. Community bodies are able to access funding support that developers and FCS cannot. The funds generated from this activity would be channelled through suitably constituted not for profit community groups to further the community aspirations for sustainable development.

Question 2: What are your views on allowing Scottish Ministers and Forestry Commissioners to offer leases and cutting rights over parts of the national forest estate?

We recognise that allowing the Scottish Ministers to offer leases in parts of the National Forest Estate would create an opportunity for the government to raise capital for the purpose of tackling climate change. However, we are not convinced that leasing 25% of the national forest estate for 75 years to a single organisation is the best way to generate funds for woodland expansion, or to safeguard future opportunities for community development and environmental enhancement in Scotland's forests. This could incur significant risks in too great a loss of public control over a long period of time and do not appear to be balanced by quantifiable climate change gains.

Currently, the National Forest Estate is financially accountable to the national government. Changes to the 1967 Forestry Act would allow Scottish Ministers to transfer or gift ownership, landlord interest and management rights to not for profit community bodies who would manage these forests on behalf of the Nation, working with FCS and other appropriate bodies.

We believe that if these leases are with suitably constituted community groups as per the National Forest Land Scheme, then the benefits are multiple. The

National Forest Estate is perhaps Scotland's most valuable renewable resource in the transition to a low carbon economy. To effectively lose control of 25% of the most productive forest for 75 years could seriously reduce Scotland's ability to meet its commitments on CO2 reduction targets. It is not so much about planting more trees as how we manage and use the trees we have.

Massive timber housing could be fixing carbon for hundreds of years, whereas a newspaper lasts a day.

Question 3: What are your views on (i) transferring the proceeds from leases and cutting rights to a not for profit trust, for investment in woodland creation; (ii) transferring the landlord's interest in this land to a not for profit trust; and (iii) Ministers stipulating the constitution for such a not for profit trust.

If there is to be a single not for profit trust then it should act as a manifold or conduit to distribute the proceeds from leases and cutting rights to not for profit community groups for investment in woodland creation. This could help empower and engage community groups across Scotland whilst creating local employment. If the proceeds were channelled to not for profit community groups and could be used to top up new woodland creation grants from SRDP to 100% then trees will get planted and managed. It would not necessarily need to be a new organisation; an existing not for profit body such as the Community Woodlands Association would be as effective.

Rather than setting up a new organisation it would be more sensible to seek changes in State Aid rules and central government accounting procedures to allow FCS to manage its finances better and offer suitable rates of grant support to deliver private sector woodland expansion targets.

Currently existing charitable organisations have unique and individual constitutions which have been agreed with OSCR, these cannot be subject to political influence.

Question 4: Are there other actions which need to be taken, or are there other changes in legislation which need to be made, in order to allow the public and private forestry sector to contribute to Scotland's target of reducing emissions by 80% by 2050? If so, please outline what these are.

We welcome and support the Government's commitment to tackling climate change and understand the need to plant more trees. However, we feel it is misleading to believe that planting trees is going to tackle climate change. For the government to achieve its commitment to CO2 reduction of 80% by 2050 it must mobilise and engage the people of Scotland in a transition to a low carbon economy. To achieve these targets a 'business as usual' approach is not an option. It requires a transition in the way we grow our food, manage our forests, produce our energy, build and heat our homes and

live our lives. The transition approach cultivates the collective genius of the nation in a positive movement towards a low carbon economy.

In terms of climate change natural regeneration of native woodland is the most effective as it can be achieved with minimal ground disturbance which on peaty soils is essential. Broad-scale reforestation could be achieved through fundamental rethinking the Scottish Government support for land management which discourages upland grazing, encourages landscape-scale deer management and empowers local communities to be involved and take action by becoming stewards of their local forested land. A community that is custodian of its local forest could help deliver the Scottish Forestry Strategy on behalf of FCS and action on climate change and sustainable economic and social development on behalf of the Scottish Ministers. This would improve local habitats, livelihoods and biodiversity.

We need to move away from seeing 'best value' in purely economic terms and start to consider 'best value' in social and environmental terms. A better use of the National Forest Estate, in the fight against climate change, would be for the government to empower communities to take local action by releasing National Forest Estate land to not for profit community bodies. Whole communities could reduce their collective carbon emissions and be actively fixing carbon whilst making them more resilient to global change and contributing positively towards the government's central aim of sustainable economic growth.

There are a number of ways in which finance could be raised for tackling climate change through replanting schemes and investment in Scotland's forests.

- Similar to Energy4all, a similar co-operative style investment programme could be established to attract funds for woodland expansion through community groups or an independent trust. Similarly, the sale of Bonds in forestry or forest "futures" might be another mechanism for people to invest in forestry.
- Expand, or at least maintain the support local woodfuel supply chain development and the use of Scottish timber in buildings.

The realignment of Scottish Government support for land management needs to link with climate change mitigation proposals. Currently SRDP is failing to deliver new planting schemes as the grants for creating woodland are not competitive with the subsidy for not having woodlands.

For example, Single Farm Payments and the Less Favoured Area Support Scheme should be linked to activities relating to tackling climate change and should incentivise woodland creation rather than discouraging it.