

From: Peter Norman
Sent: 27 January 2009 21:21
To: liz.kirk@forestry.gsi.gov.uk
Subject: Consultation on forestry provisions in the Scottish Climate Change Bill

Please keep my address and email address confidential. You are welcome to make public the remainder of this consultation response.

Should you wish to respond to these comments please use email ONLY.

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

26th January 2009

CLIMATE CHANGE AND THE NATIONAL FOREST ESTATE

Consultation on forestry provisions in the Scottish Climate Change Bill

Dear Liz,

The following consultation response constitutes my personal views. However, I am employed as the Biodiversity Officer for Dumfries and Galloway and over the last 8 years I have worked with over 80 partner organisations, including community groups, private landowners/managers, voluntary groups and statutory agencies, to carry out a wide range of biodiversity projects throughout Dumfries and Galloway. My personal views therefore reflect this experience.

I welcome the seriousness with which the Scottish Government is taking climate change. Whilst the current financial recession has many implications, which need to be addressed and minimised as far as possible, the reality is that the recession will come to an end within a period of months or, at the worst, a few years. The consequences of climate change have potentially enormous implications for Scotland, along with the rest of the world, for decades or even centuries to come.

With regard to the specific queries posed in the consultation paper, I respond as follows:

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?

This appears to be a sensible suggestion. Forestry Commission land, in many locations, is ideally suited to renewable energy programmes.

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?

I would strongly oppose such a proposal. It appears to make absolutely no sense from a variety of viewpoints:

From an environmental point of view, the spread of commercial afforestation in places such as Dumfries and Galloway has led to many environmental problems including acidification of watercourses, loss of landscape quality, damage to archaeological and cultural heritage, and greatly reduced populations of species including Golden Eagle, Salmon and many species of wildflower, butterfly and other invertebrates. Since the mid 1980s, the Forestry Commission has taken enormous strides to correct these problems, and with some success. I have personally been involved in numerous such projects with the Commission over the last decade. Although, some of this work has filtered through to national forestry guidance, such guidance meets only minimum environmental requirements (well below that practised by the Commission on much of the land they manage) and I remain to be convinced that even these minimal standards have been met in some private forests. Over the same 10 year period that I worked with the Commission, I have had virtually no involvement with any private forestry company on environmental projects. This is not through lack of effort on my part - private forestry companies have been invited to numerous meetings, to participate in projects, or simply to report on the projects they have carried out. With the exception of two independent private forestry consultants, I have not yet even received a reply to these invitations. My latest communication with a private forestry company involved a complaint that they should not have to pay £25 for a hard copy the latest Biodiversity Action Plan. A company that refuses to pay such a small amount for a standard piece of regional guidance that will last the next 10 years, is unlikely to invest in any environmental improvement projects beyond the bare minimum of requirements. Leasing additional land to them will constitute a significant backward step for standards of environmental land management in Dumfries and Galloway, and probably throughout Scotland.

From a climate change point of view the proposals have little scientific support. The majority of greenhouse gases (excluding those locked up in the seas and oceans) are stored in the soil, especially soils of high organic content such peats that cover extensive areas of Scotland. Comparatively little is stored in the vegetation. Planting additional areas with commercial forest will absorb carbon in the short-term, but this carbon will be released following harvesting. If the timber could be used for building purposes, it may remain locked up for many more decades, but the reality is that almost all Scottish timber is of a lower quality and is made into products with a relatively short life. For this reason Scotland has been importing most of its high quality construction timber since the thirteenth century. Therefore, if new forests are planted on high organic soils, grown for only 40-60 years, harvested mechanically with long-distance timber transport and made into products with a short-life, there is a very real prospect that this proposal, designed to mitigate climate change, will end up producing exactly the opposite result. The only way to ensure that this does not happen is to carry out a detailed carbon balance assessment in advance of planting on each individual site. The eminent woodland ecologist Dr Oliver Rackham of Cambridge University describes the role of tree planting in carbon sequestration thus: "exhorting people to plant trees to sequester carbon dioxide is like telling them to drink more to hold down rising sea level."

From an economic point of view, timber prices vary widely. Local sawmills, timber transport companies and forestry contractors therefore experience times of boom and times of relative inactivity. At present, the Forestry Commission tries to even out these cycles by harvesting at a time when timber prices are low. Without this contribution, many local companies would go out of business during the low periods of the cycle, and would therefore not be present to take advantage of the high periods. Only national, or even international companies, would be in a position to remain in business during the complete cycle. This

would have a negative impact on local employment, and probably also result in increased timber miles and carbon emissions.

From a tourism and recreation point of view, virtually all of Dumfries and Galloway's FC forests have facilities of a much greater quality than anything found in privately managed forests. These include nationally recognised visitor centres and mountain bike trails (which I understand will be excluded from any proposed leases) but also local facilities, used by a smaller, but nevertheless significant, number of visitors and a very high number of local people. Experience to date demonstrates that monitoring, maintenance and insurance of such facilities by private forest companies is well below Forestry Commission standards. Leased forests will therefore result in a reduction in quality of such facilities, or possibly their complete loss. This may result in people not using them (resultant health impacts) or driving to a forest still managed by the Forestry Commission (resultant carbon emissions).

I suggest that this proposal is re-considered. The only benefits I can envisage are increased profits for a handful of large private forestry companies.

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 of such a not-for profit trust.

As I cannot see any benefits arising from leasing cutting rights, it therefore follows that I oppose all these proposals.

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.

The majority of greenhouse gases are stored in soils of high organic content such peats. Whilst these areas of unplanted high organic-content soils contribute little to the absorption of greenhouse gases (absorption of carbon being balanced by emissions of methane), the presence of forestry is extremely damaging to them, oxidising the peat and resulting in a substantial net contribution of greenhouse gases. Therefore, it should be a top priority to remove forestry from these areas, restoring the peatlands for the benefit of carbon balance, water quality and biodiversity.

Should the Scottish Government wish to pursue tree planting as a method to minimise climate change, I suggest it is limited to broadleaved species managed on a very long rotation with low impact methods. The contribution of these to climate change will be minimal, but at least they could be associated with a wide range of social, economic and environmental benefits.

Yours sincerely,

Peter Norman