

From: Steve Blow
Sent: 27 January 2009 23:09
To: liz.kirk@forestry.gsi.gov.uk
Subject: Consultation on the Climate Change (Scotland) Bill

Dear Sirs,

please accept my comments with regard to the forestry proposals set out in the Consultation on the Climate Change (Scotland) Bill;

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?

I fully support the proposal to enter into joint ventures that would allow Forestry Commission Scotland (FCS) to capitalise on income that is currently being missed. This income would be available to invest in even more environmental and recreational enhancements or woodland expansion.

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 object strongly this proposal as I believe that the argument is poorly conceived, likely to reduce the public benefit through loss of investment in recreational, environmental and economic enhancements and may end up costing the tax payer more instead of saving £200 million. The Minister has tried to reassure us that the high standard of management that FCS currently undertake will be maintained, but it is not in the economic interests of private sector companies to invest in these aspects of land management. These companies would be eligible for SRDP funding for the leased land, but as a competitive and highly complex scheme, the money would be spread even more thinly than it currently is and benefits to the wider countryside would be lost.

The loss of income to FCS from the most productive parts of the forest estate would result in a greater annual operational deficit if the same quality of management is maintained on the rest of the national forest estate. Has this additional cost to the tax payer been considered in the potential 'savings'? I am also aware that in some parts of the country, FCS sell the standing timber and the private sector then are directly involved in the harvesting and processing of the timber, which already supports local jobs and rural economies.

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.

I see little point in creating a new, or utilising an existing not-for-profit Trust to undertake this work. Continuing to fund the work of organisations such as The Woodland Trust and Central Scotland Forest Trust, may help to create some additional planting, but the landscape scale of change that is required needs a more fundamental change in the way the issue of woodland expansion is undertaken and there has to be widespread buy in from all landowners and land managers.

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.

I would like to suggest that when the SRDP funding is reviewed, that payments for woodland expansion are significantly increased to make landowners and land managers more interested in new planting. It would appear to be difficult to purchase a sufficient numbers of large areas of land to achieve the targets set by Government in the time scale and is it more likely that far more numerous,

but smaller plantings by farmers and landowners would help contribute to the target far more effectively?

Peatland restoration should be factored in as part of the work to reduce emissions and help to lock up carbon - FCS in Scottish Lowlands have a large raised bog resource which should be restored to active peat bogs.

A tough stance on deer control should be developed to reduce deer numbers in the Highlands, to allow uplands to recolonise with scrub and woodland.

Careful consideration should be given to the establishment of new woodlands to ensure that a mix of native broadleaved trees as well as quick growing conifer species are utilised to help lock up carbon in both the short and longer term. This will also help provide opportunities for wildlife to move in response to climate change.

Many thanks

Stephen Blow

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