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Ms Liz Kirk  
Forestry Commission Scotland  
Silvan House  
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EDINBURGH  
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7 January 2009

Dear Liz,

Please find attached a response from BP to the consultation on forestry provisions in the Scottish Climate Change Bill.

As you will see from the response, BP is part of the Scottish Forest Alliance (SFA) formed with the Forestry Commission Scotland, the RSPB and Woodland Trust Scotland in 2000. The aim of the Alliance is to regenerate and expand native woodlands across Scotland. Fourteen sites are being developed and the ultimate aim is to develop 10,000 hectares of new native woodland. BP has pledged £10million over 13 years to the SFA – an investment which will see the sites sustainable until at least 2206.

We therefore have an interest in this consultation and have responded accordingly as attached.

If you would find it useful to learn more about this unique Alliance and BP's role in it, please do not hesitate to contact me.

Yours sincerely,

Lynne Staples-Scott  
Corporate Responsibility & Performance Manager, Scotland

## **BP RESPONSE TO CONSULTATION ON FORESTRY PROVISIONS IN THE SCOTTISH CLIMATE CHANGE BILL**

**7/1/09**

Q1. 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?

**BP Response:** Nil

Q.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?

**BP Response:** The arrangements around leasing and cutting rights would need to be sufficiently robustly managed to ensure the overall strategy was not compromised by locally centred action.

Q.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.

**BP Response:** We would support any lease/cutting rights income being invested in woodland creation and would further suggest this income is used to facilitate partnering with business on woodland creation. We would draw your attention to the Scottish Forest Alliance. This project, where BP is working with the Forestry Commission, Royal Society for the Protection of Birds and Woodland Trust Scotland has created many hectares of native woodland in Scotland through just such an arrangement. The project looks at a number of strategic objectives including carbon sequestration but has also sought to ensure biodiversity is enhanced and a contribution is made to the local economic and social situation. It might be useful to examine this project in some detail as it has brought the Forestry Commission experience in dealing with some of the issues it may encounter in its current proposals. These include the verification of carbon sequestered and the differences between a project designed purely to address climate change compared with one which seeks to bring other benefits.

Q4. 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 they are.

**BP response:** Proving the contribution made through woodland creation to climate change reductions has always been difficult. A pragmatic process which balances scientific certainty with the costs of achieving that certainty is needed to avoid much of the funding going on evidencing the carbon sequestered rather than paying for "trees in the ground". Regulators could help by recognising and implementing a process that accepts this can be different from the evidence required for major capital equipment projects on industrial sites.

Where business is to be involved as a partner in tree planting projects there must be a mechanism where carbon credits from sequestration within Scotland can be utilised by

those companies within the EU. The current situation does not allow business to gain credits from investment on tree planting within the industrialised world leading inevitably to that investment being made elsewhere. If woodland creation projects are to be based in Scotland, whether or not their only focus is climate change mitigation, regulators must provide a mechanism that allows Scotland to gain directly from this investment.