

From: Michael & Sheila  
Sent: 16 January 2009 11:07  
To: liz.kirk@forestry.gsi.gov.uk  
Subject: Climate Change and the National Forest Estate - Responding to the Consultation

Importance: High

Your ref: S9-1-22-21 dated 11 December 2008

Letter from Michael Russell MSP, Minister for Environment

Dear Liz Kirk

Climate Change and the National Forest Estate - Responding to the Consultation

Introduction

Please find below the responses to your consultation on Climate Change and the National Forest Estate from Findhorn & Kinloss Community Council (FKCC) Moray:

Response to Question 1 - "What are your views on allowing Forestry Commissioners to enter into ....."

a. Forestry Commission (FC) - Joint Ventures:

Who would they be with? In principle no objection as long as FC is lead body as this will ensure efficiency.

b. FC and Renewable Energy Programme:

FC should be promoting, researching and leading the way in conjunction with its partners.

c. National Forest Estate:

We assume that this means ALL land owned directly or occupied under the 1919 Act of Parliament and compulsory purchase.

If not, then what is the document referring to? However, these answers given are based on the assumption that the paper refers to FC land.

Notwithstanding the above, our overall view is that the consultation paper does not provide sufficient detail on this extremely important subject for the FKCC to give a comprehensive and robust response. The FKCC feel that all that has been provided is a poorly written Executive Summary of a much larger document.

Response to Question 2 - "What are your views on allowing Scottish Ministers and Forestry Commissioners to offer leases ....."

We believe that the FC should be a stand-alone Agency. As a landlord the FC should be allowed to act as a self-governing landlord, as any other public or private landlord; and not interfered with by or burdened by Scottish Ministers or NGOs. The FC has sufficient experience of managing its own Estate and it has the skills/knowledge/experience to do this, which cannot be said of some other agencies and government bodies. Again our view is that the consultation paper does not provide sufficient or depth of detail for the FKCC to give a comprehensive and robust response. The FKCC feel that all that has been provided is a poorly written Executive Summary of a much larger document.

Response to Question 3 - "What are your views on -

(i) This proposition, in itself, could be a good idea as long as Scotland does not end up with the logging problems experienced in South America and Indonesia. There is not sufficient detail explaining the formation of the "not for profit Trust" for the FKCC to provide an accurate and robust response. The principle of reinvesting income from rents/leases/cutting/cropping licences/sales is sound business practice in an economic turbulent time. We assume self investment means a reduction in the burden against the public purse to achieve the targets of carbon emission reduction through increasing carbon capture, through the planting of trees. However, these monies should not be extracted by a third party, so as to minimise the potential for misappropriation, or for receipts to be used for alternative government projects unrelated to the FC, instead of investment in trees.

(ii) The woodland owned by the FC is owned by the public. The FC is a government body responsible to the public. Would any such non-profit Trust be responsible to the public in a similar fashion? So why is there a need for a trust? It is thought that a trust would end up being responsible to the Directors and others - a minority - and not be of benefit to the public as a whole. There is not sufficient detail explaining the formation of the "not for profit Trust" and we do not feel able to answer this question further as the paper does not explain who "the Landlord" is, : i.e. a private landlord, the Scottish Government, UK Government Minister or body such as National Trust of Scotland or RSPB and to which "land", is referred to in the question.

(iii) There is not sufficient detail provided in this "Executive Summary" for the FKCC to give an accurate and robust response to this question. However, we feel that the FC is a suitable body to manage the woodland as deemed by the "National Forest Estate". Time/effort/money would be wasted in creating a "not for profit Trust".

Response to Question 4(a) - "Are there other actions that need to be taken or ..."

1.. We would anticipate that as part of the consultation process such bodies as The Royal Institution of Chartered Surveyors, County Councils, The Crown Estate, appropriate private landlords, the Ministry of Defence, and bodies such as the National Trust of Scotland and RSPB have also been consulted.

2.. Within the climate change debate, Nuclear power should not be being ignored on ideological grounds but should only be omitted on cost grounds.

3.. Tidal wave power, which was developed in Scotland, and is already in use in Portugal should also be brought into this debate.

4.. Will the Scottish electorate have the opportunity to vote on the Scottish Forestry Strategy to achieve 25% woodland cover in Scotland by 2050.

5.. The net emission reductions which it is claimed new woodlands would contribute, cannot be calculated in isolation but should be compared in the same document to the emissions from transport (road, air, ships etc), power stations (all types including nuclear and tidal), etc. With regards to woodland creation, has someone calculated the carbon footprint of creating these woodlands and, particularly, the carbon footprint of extending logging and associated transportation operations within Scotland.

6.. TUPE needs to be considered very carefully it is not as simple as the covering letter from Michael Russell implies. What about tied accommodation? What if the lessee does not want to employ all of the FC staff who would wish to transfer? What happens to staff at the end of the lease, which may not be for as long as the suggested 75 years? E.g. the railways are expected to run for '75' years or more but the Government only offers leases/franchises of 7-12 years!!

Response to Question 4(b) - "Are there other changes in legislation which need ...."

1. This Paper discusses Scotland's forestry target for the reduction of carbon emissions. However, we feel that it is not possible to provide a meaningful response without reference to details of emissions from carbon producers in Scotland.

2. Legislation if introduced should ensure that all discussion, debate and government documents regarding carbon producers/emitters v carbon reduction methods and techniques are kept together and not debated separately, as in the case of this Paper. The National Forest Estate and climate change is part of a much bigger "project" and, therefore, "joined up" thinking between Government and other interested agencies is required.

Summary

Our view is limited due to our inexperience in this subject matter, being predominantly a coastal agricultural community rather than one directly involved in forestry on a large scale. The consultation paper does not provide

sufficient detail on this extremely important subject for the FKCC to give a comprehensive and robust response, whilst considering its potential impact on our community as a whole. We feel that the paper provided is an Executive Summary of a much larger document.

Regards

Michael J Thompson

For and on behalf of Findhorn & Kinloss Community Council

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