

Questions from our consultation

This form sets out the questions we ask in a consultation on restoring and expanding open habitats from woods and forests in England that we launched on 12 March 2009. The consultation ends on 5 June 2009. You can find the consultation at www.forestry.gov.uk/england-openhabitats-consultation or contact Dominic Driver, Forestry Commission for further information (contact details below).

Comments on any aspect of the consultation are welcome, but we are particularly interested in your responses to the questions below. This form is available at www.forestry.gov.uk/england-openhabitats-consultation.

Your name:	Gesa Reiss
Your organisation (if any):	England Forest Industries Partnership
Date:	3 June 2009

No	Question.
The nature of the change	
1.	<p>Does your aspiration for the scale of the policy fit within our calculated range of 5,600 to 30,000 ha of restoration or expansion of open habitats from woodland or forest over 10 to 15 years? This is 370 to 3,000 ha each year. What level of intervention would you prefer and how is this justified?</p> <p>The England Forestry Industries Partnership (EFIP) is a business-focussed and led public-private partnership that aims to improve the competitiveness and viability of England's forest industries. EFIP's primary focus is national but with a strong regional dimension.</p> <p>EFIP welcomes the development of an Open Habitat Policy as this should provide a framework to manage future deforestation and reduce ad hoc activities as experienced in the past. However, policy development must take place within the following context:</p> <p>WOODLAND COVER, REGULATIVE FRAMEWORK and WOODLAND OWNERSHIP</p> <ul style="list-style-type: none"> - England is one of the least wooded countries in Europe (9%; 1,127,000ha; 2008). The UK's forest stocks are believed to have started falling from about 2005 due to the dramatic reduction in new planting and the nature of this planting, i.e. most woodland creation in the last two decades comprised broadleaves in small areas (average 3ha). Industry is appealing for no net loss of productive woodland and is demanding an increase of woodland cover. - A range of existing policies and strategies that encourage replanting of broadleaf woodlands but fail to support adequately the creation and maintenance of new softwood forests. Currently, EWGS discourages planting or re-stocking of conifers. Softwood timber availability in England is set to rise by 10% between 2007 and 2021 after which it is set to fall. The rise is due to maturation of the crop planted in the 20th Century. If implemented at higher intervention levels this policy would reduce woodland cover by a

No	Question.
	<p>further 30,000 ha over its timescale.</p> <ul style="list-style-type: none"> - The UK Forestry Standard demands protection of the timber and forest resource. - Lack of robust figures on UK deforestation. Deforestation takes place through existing policies / commitments to creation of open habitat, development, felling licences, etc. For example in 2003, FC estimated a rate of 500ha/year as an absolute minimum (based on felling licences). However, OS data showed a mean of 2,925 ha/year and a peak at over 5,000 ha/year (rolling surveying programme). Deforestation currently accounts for some 20 % of global emissions of CO₂, and its prevention is a global priority. Estimates of the UK deforestation rate are required for reporting under the UNFCCC GHG Inventory and the Kyoto Protocol. - Woodland ownership: In some regions up to 70% of the woodlands is privately owned. Creation of open habitat as result of this policy is not mandatory and will most likely happen to a large extent on FC owned / managed woodlands (18% of publicly owned woodlands). A small percentage of private woodland owners will be encouraged through this policy (possibly due to higher creation / maintenance grants) to convert some of their woodlands to accommodate other land uses, e.g. in the upland situation convert conifer blocks to grouse moor (grouse moor can fetch £10k/ha, the land element of a woodland is valued around £400/ha). A large proportion of the privately owned woodlands do not produce any quantities of quality timber therefore most of the quality domestic timber is from FC plantations. The strongest effect of the policy is most likely felt by businesses (e.g. sawmills) using FC softwood (in some cases businesses source up to 100% from FC). <p>ECONOMIC ASPECTS</p> <ul style="list-style-type: none"> - Domestic timber sector: the regional setup of a mainly rurally based forestry supply chain and an already existing shortage of quality domestic softwood / hardwood. The complexity of decision making associated with global markets and trading a commodity that can take up to 60 years to mature. Woodland management and business investment plans are planned/based on timescales of decades. Decisions taken now will have direct implications for the rest of this century and well into the next. - UK consumption of wood (60%) and panel products (40%) was 18 million m³ in 2008. Approx. 75% of timber is imported predominantly from within Europe (consider carbon foot print of transportation). Approx. 60% of wood and wood products are used in construction (potential of material substitution) and the remainder is used by the furniture, packaging and fencing/ outdoor industries. Value of wood products industry (incl. forestry) is approx. £11 billion at equivalent manufacturers' selling prices (2004). - There is a strong link between reduction of timber production (domestic) and reduced economic activity in the timber sector. In basic terms, reduction in timber production will lead to loss of: jobs, business and skills base, and capital/ assets, and to a decrease in confidence of businesses using domestic wood for energy and material substitution (construction sector). Sawmill owners and other processors using domestic timber supplies are already concerned about future reduction in supply and this will

No	Question.
	<p>influence their future investment decisions. In 2007, England's 107 sawmills alone consumed a total of 1,673,000 green tonnes. (EFIP report to FC, 2009. Open Habitat Restoration Policy and its impact on the confidence of the timber sector in England)</p> <ul style="list-style-type: none"> - The prolonged use of public money (cost of £61 M at higher level of intervention) to create, and more importantly maintain, a transient land type. <p>CLIMATE CHANGE, CARBON TRADING and RENEWABLE ENERGY</p> <ul style="list-style-type: none"> - Climate Change: "The investment that takes place in the next 10-20 years will have a profound effect on the climate in the second half of this century and in the next" (N. Stern, 2006). Woods and forests make a small but significant contribution to the UK Government's commitment of reducing carbon emissions. Further, this contribution must be met by all UK countries, i.e. the following scenario must be avoided where reduced woodland cover in England is balanced through increased woodland cover in Scotland. - Fast growing tree stands (softwood) sequester between 3-10tC/ha/annum; over the lifecycle of a stand this amounts to about 200tC/ha/annum. - Woodlands play a role in mitigating against the effects of climate change by, for example, reducing soil erosion, alleviating flooding and providing shade in both the urban and riparian environment. - Climate change and its detrimental effect on the health of forests and woodlands, in particular commercial softwood stands, i.e. increased loss of forests and woodlands / greatly reduced yields due to increased pest and disease incidences, windfall, unfavourable growing condition for current species mix. Potentially there could be a natural, uncontrolled creation of open habitat and additional unmonitored deforestation. - Woodlands / forests, in particular softwoods, play a role in climate change mitigation through substitution of fossil fuels and materials. Energy used to manufacture equal volumes (kg/m³) of: <ul style="list-style-type: none"> Sawn timber: carbon released 15; carbon stored 250 Steel: carbon released 5320; carbon stored 0 Concrete: carbon released 120; carbon stored 0 Aluminum: carbon released 22000; carbon stored 0 - Typically the total embodied energy in a timber-frame house is 250 kWh compared with 100 kWh for a brick house. - UK government pledge of zero emission new housing by 2011.

No	Question.
	<ul style="list-style-type: none"> - Carbon balance: The role of forest soils - carbon content of woodland soils is generally higher than soil under any other vegetation cover (average of 217tC/ha). Managing woodland of low commercial value as carbon store rather than removing these (carbon reserve management) to boost carbon storage capacity. - Carbon trading: The value of forests (vegetation and soils) as an increasing pool of carbon. Carbon is a traded commodity and UK forests once included in the EU trading scheme could be worth €160 million annually (16.30 Mt CO₂; at 2004 prices) - Likely inclusion of Harvested Wood Products accounting in the post 2012 climate regime. Assuming sustainable forest management - if a forest is managed so that the standing stock of the forest remains at least constant over time, and the stock of wood products is increasing, then CO₂ is being removed from the atmosphere in net (Estimations of net emissions on basis of pool/stock changes). - UK government's renewable energy targets (15% of total energy needs): woodfuel and timber production needs to be matched to end-users for optimal utilisation of wood's contributions to reduced fossil fuel consumption. Biomass contributes 83% to the renewables target of which 10% is wood (with a potential contribution of 16% should a further 2Mt of wood be made available which equates to a 60% increase in wood production in England).
	<p data-bbox="188 1115 392 1144">BIODIVERSITY</p> <ul style="list-style-type: none"> - UK Habitat Action Plan woodland expansion targets. Current existing fragmentation of woodland habitats and potential affect of resilience of this habitat in the face of climate change. Woodland species of plants and animals are often specialists that are poorly adapted to survive in open habitat. Consideration of minimum woodland size (even within a mosaic of habitats) to maintain resilience. Any new plantings will take about 50 years to deliver ecological niches and to provide an effective link at landscape scale. - Economically valuable forest can be managed sensitively in ways that encourage and promote social and environmental principles and much has been done over the past twenty years.
	<p data-bbox="188 1666 536 1695">LEVEL of INTERVENTION:</p> <p data-bbox="188 1760 1410 1955">EFIP would only support low levels of interventions as outlined in the recent report on the impact of this policy on the confidence of the timber sector (EFIP, 2009. Open Habitat Restoration Policy and its impact on the confidence of the timber sector in England. Report to the Forestry Commission). A large proportion of the interviewees stated that any deforestation rates above 300ha/annum would send out a negative signal to an already struggling industry and therefore were undesirable.</p>

No	Question.
Desired outcomes	
2.	Have we developed a reasonable list of desired outcomes of the policy? Do you wish to suggest any amendments?
<p>Yes.</p> <p>Amendments:</p> <p>Concerning timber sector activity - what would be an acceptable reduction of economic activity ? What would be 'not significant' in terms of impact of this policy ? This requires a more defined statement and hence further investigation.</p> <p>Concerning financial viability - if the outcome is 'no frequent injections of external funding' who would provide the 'internal' funding and what are the opportunity cost ?</p> <p>The focus should be on 'what mix of trees/Open Habitat can we afford' in terms of a sustainable (financial) legacy, otherwise it will be a case of biodiversity without responsibility.</p>	
Measuring the success of the policy	
3.	Have we developed a reasonable set of indicators for evaluation? Do you wish to suggest any amendments to this indicator list?
<p>No. Unless there are robust benchmarks / baselines for all indicators. Concerning woodland cover, currently figures on deforestation rates are not robust so how would the indicator 'net change in woodland cover' be used ?</p>	
Policy proposals	
Elements present in the policy	
We will treat woodland and open habitats as potentially mutually beneficial	
4.	Do you agree that woodland and open habitats are potentially mutually beneficial? Is promotion of this idea helpful in gaining support for open habitat restoration and expansion from woodland?
<p>Depends. Level of woodland fragmentation and connectivity needs to be considered on a case by case basis. In the light of climate change what would be the effect on woodland biodiversity and long-term maintenance cost if the more vulnerable habitat of the mosaic (most likely to be heathland) would deteriorate significantly ? Woodland plots as part of a 'mosaic' must be of a size that is commercial viable, e.g. suitability of the site for commercial harvesting.</p> <p>Who would be the beneficiaries of economic activity associated with the forestry part of the mosaic ('Economic activity associated with forestry can offset some of the cost of OH management')? Does this assume the unlikely scenario where there is only one owner of the 'mosaic' ?</p> <p>EFIP would not support 'promotion of this idea in gaining support'.</p>	
A presumption against removal of 'mature native woodland'	
5.	Do you agree with the principle that there should be a presumption against removal of ancient and 'mature native woodland'?
<p>Yes. Also to include no pre-mature felling.</p>	

No	Question.
6.	<p>What do you think of our proposed outline definition of 'mature native woodland'?</p> <p>agree.</p>
<p>We will expect practitioners to help local users to participate in development of the initial proposals</p>	
7.	<p>Do you agree that local participation in decision making is helpful? What is your preferred option for how we should apply this element?</p>
<p>Yes. No preferred option (1-3). Would be unable to support option 4.</p>	
<p>We will promote mechanisms for prioritising woodland removal at a regional level</p>	
8.	<p>Do you agree that prioritisation at a regional level is appropriate for this policy?</p>
<p>Yes - imperative.</p> <p>See EFIP report to FC, 2009: each region has its distinct setup of how the forestry / timber sector interrelates. Timber is sourced very regionally and in the case of wood fuel businesses' local supply is particularly important as transport cost increase with distance making the product non-competitive with other fuel sources.</p> <p>Concerning regional mechanisms to prioritising woodland removal: these need to be developed in partnership with strong private forestry/timber sector representation, esp. in those cases where they cannot be based on current mechanisms such as RFFs.</p>	
<p>We will apply a framework for evaluation to projects</p>	
9.	<p>Do you agree with this framework for evaluation? What is your preferred option for how we should apply this element?</p>
<p>No, unless long-term impact measures are part of the evaluation framework. More information on the frequency of reviews is needed. Using the framework as a condition of funding is usually 'best practice' for funding bodies.</p>	
10.	<p>How much and what kind of support do you think we should give to practitioners to help them evaluate their projects using this framework?</p>
<p>Depends on who will provide majority of financial support to implement this policy.</p>	
<p>To avoid net deforestation in England we will try not to go over a threshold rate of woodland removal due to restoring and expanding open habitats.</p>	
11.	<p>Do you agree with the principle of an England scale threshold rate of woodland removal? What is your preferred mechanism by which such a threshold could be applied to policy?</p>
<p>No. Unless 1,100ha/year as a threshold figure is reviewed and as stated above regional circumstances are considered.</p>	

No	Question.
	<p>The Kyoto protocol does not specify the conditions or species mix of a woodland. Therefore deforestation levels could still be within the limits but could in reality remove commercially viable woodlands and hence have a negative impact on the timber sector.</p> <p>EFIP would welcome funded compensatory planting including softwoods as an option. However, the Partnership recognises that financial constraints, current funding mechanisms for woodland creation and landuse issues might limit / prohibit any such activity in which case loss of any commercially viable stands would be unacceptable.</p> <p>None of the proposed mechanisms would be acceptable as the proposed threshold is unreliable. Please consider new mechanism.</p> <p>Question: Under the current difficulties of reaching CO2 reduction targets wouldn't it be desirable to plant more 'Kyoto Forests' ?</p>
12.	Do you consider that the proposed threshold is about right, too high or too low?
	The proposed threshold needs to be reviewed before it is used in this policy.
Key variables	
What is the balance between achieving biodiversity objectives and the need to reduce green house gas emissions?	
13.	Is there a way, in the short term, we can better estimate the contribution to biodiversity objectives from different levels of restoration or expansion of open habitats?
	<p>Climate change should be the over-riding concern and any measures that reduce CO2 emissions should be top priority. A run-away climate will have a catastrophic impact on the survival of most species irrespective of health/extent of habitat. However, EFIP does understand that biodiversity and ecosystem resilience are necessary for climate regulation and consequently human wellbeing. Not considering ethical reasons, EFIP queries the availability of long-term support (financial) for climate sensitive habitats such as lowland heathland.</p> <p>This question assumes a simplistic relationship between levels of restoration / expansion of open habitat and health of habitat / biodiversity. EFIP queries whether there is a short term solution. Maybe a solution could be adopted from agri-environmental schemes used in agriculture ?</p>
14.	Do you agree that management practices to minimise carbon emissions during restoration or expansion of open habitats should be adopted? Do you agree with the outline practices presented? How could we best ensure that such practices are adopted?
	<p>Yes. Yes.</p> <p>Depends on how this is financed but it could link adoption of management practices to funding. Devise management guidelines. Review management practices including continuous cover forestry.</p> <p>Any further deforestation either for open habitat creation or broadleaved woodland creation needs to be carbon accounting proofed.</p> <p>EFIP challenges the statement that the difference in carbon emissions woodland vs. open habitat management are negligible and would like to see evidence concerning the</p>

No	Question.
	statement.
15.	Do you agree that it is appropriate to include impact on long-term average carbon store <i>and</i> loss of potential to substitute timber for higher carbon materials and fuel in the calculations on carbon balance?
	yes
16.	Where do you think the appropriate balance lies between achieving biodiversity objectives and the need to reduce carbon emissions? What processes might help to make this judgement?
	Promoting/supporting mechanisms that reduce CO2 levels should be national priority. Any process that accelerates the public's understanding of the threatening nature of climate change.
Should we be managing open habitats to keep them in 'favourable condition' or should we adopt a more dynamic approach to land management?	
17.	Outside SSSIs, do you agree that a more dynamic attitude to land management could deliver equivalent or greater gains for open habitats and species than one where success for all sites is based on assessments of condition as applied to SSSIs?
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18.	If so, how might such an approach be developed? Is there scope for modifying the conservation objectives on some SSSIs to incorporate a similar approach? If not, do you consider that the endpoint for all restoration proposals should be judged against favourable condition as defined for SSSI habitats?
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What level of woodland removal due to restoring or expanding open habitats could avoid a significant negative impact on the timber industry?	
19.	Can you provide any information on the likely links between any reduction in timber production and economic activity in the timber sector?
<p>In the medium to long-term, any reduction in timber production (domestic) will lead to reduced economic activity in the timber sector. Businesses in the timber sector would be exposed to loss of: jobs (predominantly in rural communities), business and skills base, and capital/ assets. Reduced woodland management (adding to an already alarming trend), increased competition and operation cost, further reduced attractiveness of forestry /timber processing as a career, and a decrease in confidence of people using domestic wood for energy and material substitution are seen as other effects of reduced timber production. In the short term, a surge in standing sales during the period of habitat restoration could lead to increased business activities, however, this might be linked to uncertainty of timber prices. (EFIP report to FC, 2009. Open Habitat Restoration Policy and its impact on the confidence of the timber sector in England)</p> <p>The timber industry is very concerned about how this policy could impact on their businesses as evidenced by the following quotes collated through the EFIP report, emails and phonecalls to EFIP and comments made at various industry meetings:</p>	

No	Question.
	<ul style="list-style-type: none"> • The implications of having to source contracts from further afield substantially affect the operating costs of our business. This includes the transport of harvesters and other plant, extra costs of timber haulage and extra costs of keeping staff in temporary accommodation whilst working away from home. • We would have to rethink our investment plans in the light of reduced supplies of roundwood. Roundwood supplies need to be available for a minimum of twenty years for the investment in machinery to provide value-for-money. We have also grave concerns that the policy of PAWs restoration and replanting policies favouring “native” woodland will have a serious impact on our business in the future. We have doubts that the policy framework will support a forestry industry in England. • With potential increasing demand for woodfuel and FC's insistence on seeing this as an opportunity to develop undermanaged woodland, seriously decreasing the area under woodland will just erode the contracting resource further (a contractor's voice). • The implementation of this policy will devastate forest and associated industries. They are bordering on bottom of economies of scale now. The only way to ensure their survival is 100% compensatory planting and to get the crop to production stage before anymore forest land is lost. We are already in danger of being called the de-forestation industry. • A lot of the timber we have had over the last few years has come from woodland clearance and even when the sites are to be replanted they are often not done with conifers but left to regenerate. Our sawmill was completely refurbished two years ago and the machinery should last another 20 years. At the moment we have no plans to refurbish it at that time and will then shut down. There is already not enough available roundwood and this policy will only make things worse. • Softwood is more important than hardwood for producing quality timber for buildings, etc. If it drives sawmills out of business it will also affect other processors. • The softwood processing sector is vital for the development of a hardwood processing sector. If we continue to damage the productivity of the sector it will make any attempts to revitalise the hardwood sector doomed to fail. The constant battering that the forestry / timber sector has been exposed to has severely bashed its confidence and there is a general feeling of not being valued. • Modern facilities such as sawmills and chipboard plants require an economic optimum amount of raw material to run. Anything less than this tonnage results in higher unit cost. After a period when there has been little or no planting of commercial trees because of Government policy, this scenario could be brought about by relatively low levels of deforestation for whatever purpose, particularly where the clearance is in the natural catchment area of a key processor. • The industry requires confidence in the supply chain. Proposals to reduce woodland cover at any of the rates suggested will affect confidence for future investment plans. The incremental loss in volume of these proposals is circa 650,000 - 700,000 m3 per year. This would have a negative effect on business development and sends out the wrong message to the industry. Deforestation schemes must be limited to non-productive areas or areas of inaccessibility. • We must consider the unquantified losses to the economy from job losses and imports of wood and wood products which otherwise would have been made in England. If there was the right encouragement through taxation and / or EWGS to start planting commercial species on other suitable sites then there is the possibility that the proposed scheme could go ahead at a modest level without having an adverse effect on industry. As things stand today, industry could have no confidence that any investment in sawmilling or processing capacity would be supported by access to raw materials.

No	Question.
Different approaches to applying policy	
20.	Which of the three approaches by which we make decisions about woodland removal is your preferred option? Can you see any alternative types of approach based either on a combination of these approaches or on new ideas?
<p>EFIP's preferred option would be an approach that:</p> <ul style="list-style-type: none"> - ensures the ability of woods and forests to reduce CO2 emissions and to support long-term healthy economic activity in the timber sector in England is maintained. - ensures that existing and newly created open habitats are adequately supported financially to guarantee sustainable management of these habitats. - ensures appropriately funded and located compensatory planting where required and within a specified timeframe. - ensures Environmental Impact Assessments are carried out concerning woodland removal and creation of open habitat. 	
The role of compensatory planting	
21.	What is the appropriate role of compensatory planting in this policy?
<p>In some cases, compensatory planting on a like-for-like basis (accommodating climate change effect on choice of future specieses) could provide woodland expansion/creation in more supportive (tree growth and commercial activities) environments. Compensatory planting MUST be part of receiving permission to removal of woodland for open habitat creation and must be carried out IN ADDITION to any existing woodland creation projects (in particular concerning urban woodlands). Ideally location of planting should be in line with regional requirements. Equally to open habitat creation, compensatory planting MUST be appropriately funded.</p>	
Factors to consider when deciding which policy is likely to work best	
22.	Have we developed a reasonable set of questions for informing the decision on which policy is best? Do you wish to suggest any changes to the list of questions?
<p>yes. No.</p> <p>N.B.: EFIP remains unconvinced that baseline information (on all listed outcomes) exists to assess which policy option is best.</p>	
Implications for delivery mechanisms	
23.	Have we missed any major implications for delivery mechanisms? Would any be particularly welcome or unwelcome to you?
<p>Possibly:</p> <ul style="list-style-type: none"> - a detailed picture of the role / involvement of private and other public woodland owners in the implementation of this policy and their potential influence on long-term availability of quality timber. 	

No	Question.
Other comments	
We welcome your input on any other aspect of this consultation.	
Industry is concerned about the lack of transparency of the latter part of the consultation process, i.e. preparing the consultation report and option selection for attention of the minister. There is a sector-wide scepticism about the impartiality of FC as expressed through industry partners not wishing to disclose their details as they feel it might damage their business relationship with FC.	

Please include the "information about you" form with your response.¹

Please send your completed forms to:

[Dominic Driver](#)

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By 17.00hrs, Friday 5 June 2009.

¹ See www.forestry.gov.uk/england-openhabitats-consultation for a copy.