

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.

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| Your name: | David Sulman |
| Your organisation (if any): | United Kingdom Forest Products Association |
| Date: | 20 May 2009 |

| No | Question. |
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| 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 UK Forest Products Association (UKFPA) and its Members are extremely concerned about the implications of the proposals to restore and expand open habitats by the permanent removal of woodland and forest in England.</p> <p>Whilst there may be merit in formalising FC policy and developing guidance in relation to restoration and expansion of open habitats from woodland or forest, there should be a presumption against permanent removal of woodland/forest cover, especially productive forest. We would emphasise that a number of important issues must be taken into account before any decision is taken to permanently remove woodland or forest for open habitat restoration/expansion. Trees, woods, forests and wood products provide valuable economic, social and environmental benefits and also make a valuable contribution to mitigating the effects of climate change. England is still one of the least wooded countries in Europe; as a consequence we believe that greater efforts must be made to increase woodland cover in England; not decrease it, by permanent woodland removal, as is being proposed.</p> <p>Furthermore, it must be noted that the Forestry Commission is charged by Statute, (The Forestry Act), to expand and protect the nation's forests, to increase their value to society and the environment and to increase their economic value. Permanent removal of woodland and forest is plainly at odds with this responsibility. Not only is the UK forest products sector calling for no net loss of productive woodland cover in England, but it strongly recommends measures to increase woodland cover, especially of commercial timber species; it is very disappointing to see current woodland creation measures which do not encourage the planting of commercial conifer crops; these are the lifeblood of the wood processing sector in the UK and business confidence in the sector is dependent on continuity of wood supply. Any significant reduction in wood supply will have a negative impact on business confidence, which may ultimately lead to closures.</p> |

| No | Question. |
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| | <p>It must be recognised that forestry is, by its very nature, a long-term undertaking. It is acknowledged that the practice of silviculture and forest management continues to change and that today's practice is different from that seen in the past, nevertheless, the objective of ensuring that the right tree is planted in the right place, at the right time remains a sound guiding principle. Whilst some sites which have been planted in the past might not be planted in the same way today, these represent a minority and there must be expansion of commercial conifer forestry in England, Wales and Scotland. Where current practice indicates that replanting of some areas is no longer appropriate, then there must be compensatory planting, on a like for like basis elsewhere, so that there is no net loss of productive forest cover and timber supply is not reduced.</p> <p>It should be noted that deforestation is already being seen in England, as official restocking requirements result in the creation of increased open areas in forest and woodland, which has the consequence of a net reduction in the area planted.</p> <p>In England, a significant area of woodland is in private ownership and some of this woodland is currently not managed, or is undermanaged. Incentives should be provided to ensure that all woodlands are being sustainably managed, thereby maximising the benefits they can provide. Deforestation without the requirement for compensatory planting will obviously reduce the availability of wood raw materials for England's wood-using businesses and quite apart from the impact on these businesses, it will also lead to even greater reliance on imported wood and wood products.</p> <p>With regard to the level of intervention, UKFPA would only support extremely low levels of intervention in exceptional cases, where it can be shown that replanting of the area is no longer justified and that compensatory planting of commercial crops will be guaranteed. Further discussion is required to determine a maximum permissible level of woodland removal per annum; even the lower level proposed in the consultation would give rise to concern, unless there is guaranteed compensatory planting.</p> |
| <p>Desired outcomes</p> | |
| 2. | <p>Have we developed a reasonable list of desired outcomes of the policy? Do you wish to suggest any amendments?</p> |
| <p>The list of desired outcomes is considered to be reasonable, although further detail is required. With regard to timber sector activity, there must be no reduction in economic activity as a consequence of the proposed measures.</p> | |
| <p>Measuring the success of the policy</p> | |
| 3. | <p>Have we developed a reasonable set of indicators for evaluation? Do you wish to suggest any amendments to this indicator list?</p> |
| <p>The proposed indicators are satisfactory, but it must be noted that accurate statistics on deforestation are required.</p> | |
| <p>Policy proposals</p> | |
| <p>Elements present in the policy</p> | |
| <p>We will treat woodland and open habitats as potentially mutually beneficial</p> | |
| 4. | <p>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> |

| No | Question. |
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| | As a general observation, woodland and open habitats can be mutually beneficial, but care is required in any promotion to ensure that the relative merits are kept in proportion and it is appreciated that the benefits vary from site to site. |
| 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'? |
| | Not only should there be a presumption against removal of ancient and mature native woodland, but there must also be a presumption against the permanent removal of commercial conifer crops. There must be no net loss of productive woodland cover in England. |
| 6. | What do you think of our proposed outline definition of 'mature native woodland'? |
| | The definition is suitable. |
| We will expect practitioners to help local users to participate in development of the initial proposals | |
| 7. | Do you agree that local participation in decision making is helpful? What is your preferred option for how we should apply this element? |
| | Local participation in decision making in relation to proposed removal of forest or woodland is very necessary, provided that a well informed and balanced approach is taken, which involves all relevant parties. |
| We will promote mechanisms for prioritising woodland removal at a regional level | |
| 8. | Do you agree that prioritisation at a regional level is appropriate for this policy? |
| | it is vitally important that regional priorities are carefully considered. Every case must be considered on its merits, taking all relevant matters into consideration before a decision to remove woodland is reached. |
| We will apply a framework for evaluation to projects | |
| 9. | Do you agree with this framework for evaluation? What is your preferred option for how we should apply this element? |
| | Evaluation is a critical stage and guidance will be required to ensure appropriate and consistent approaches are taken. The effectiveness of evaluation should be reviewed on a regular basis to ensure its continued fitness for purpose. |
| 10. | How much and what kind of support do you think we should give to practitioners to help them evaluate their projects using this framework? |
| | Although support will be required, it is difficult to comment in further detail at this stage. |

| No | Question. |
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| 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. | |
| 11. | 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? |
| It is essential that there is no net loss of productive forest cover in England as a consequence of the restoration/expansion of open habitats. Compensatory planting must be guaranteed. An England-scale annual threshold rate for removal is desirable, but further work is required before the actual threshold level is determined and agreed. At this stage, we would recommend that the threshold be kept below the 370ha/year level proposed. | |
| 12. | Do you consider that the proposed threshold is about right, too high or too low? |
| We believe that the current threshold requires further consideration before it is implemented, as there are considerable uncertainties about the current rate of deforestation in England and also in relation to likely planting levels in future; therefore caution is required in determining the threshold. | |
| 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? |
| We believe that further consideration must be given to the ability of existing forests and woodlands to support biodiversity objectives and that permanent removal for open habitat purposes must be reserved for exceptional circumstances and must be considered as a last resort. Maximising the role that forests and woodlands play in mitigating the effects of climate change must be the key priority for the foreseeable future; accordingly, deforestation must not be an objective. | |
| 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? |
| We agree that management practices to minimise carbon emissions during restoration and expansion of open habitats must be adopted. There should be a link between funding and desired management practices. The benefits in relation to carbon storage provided by trees and wood products must be more widely appreciated and maximised and for this reason, wood production should also be maximised. The provision of best practice guidance would be useful. | |
| 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? |

| No | Question. |
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| | We strongly agree that both matters must be included in any considerations. |
| 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? |
| | Tackling climate change is a national priority and this must be reflected in forestry policy. On this basis, there must be a priority in favour of reducing carbon emissions and therefore, a presumption against permanent removal of woodland. In the rare cases where removal is justified, there must be guaranteed compensatory planting of productive woodland. |
| 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? |
| | There is thought to be scope for consideration of a more dynamic attitude to land management; after all, the climate is truly dynamic. We recommend that consideration be given to research into how existing forests and woodlands can further improve their contribution to biodiversity; rather than permanently removing woodland, there should be new planting which has the prime objective of enhancing biodiversity. |
| 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? |
| | See answer to question 17. |
| 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? |
| | It is the case that any reduction in domestic timber production will result in reduced economic activity in the forest products sector; principally amongst timber harvesting and contracting, haulage and primary wood processing businesses, (i.e sawmills, panelboard mills and paper mills), reliant on domestic timber. The impact of reduced wood supply will be a major consideration in any investment planning in the sector; some plans would undoubtedly be shelved, or downsized. Loss of jobs, either as a result of contraction of businesses because of wood raw material shortages and/or increased costs, or in some cases, complete closure, would result in significant hardship, especially in rural areas. The vast majority of businesses in the sector are SME's and many are micro-businesses; for all of these businesses, confidence in continuity of wood supply is critical to their continuation. For this reason, a deforestation policy could have a major impact on business confidence in the sector more quickly than might be envisaged by the consultation. The sector is already under very considerable pressure and active deforestation would undoubtedly result in some business closures. |

| No | Question. |
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| | <p>Deforestation would also increase business costs and therefore negatively impact on competitiveness and profitability as wood processors would have to purchase their wood raw materials from further afield, thereby increasing costs and at the same time, increasing carbon emissions, as a consequence of increased haulage distances.</p> <p>In addition, as 'official' deforestation would probably be perceived by the public as a lack of support for forestry, it is very likely that young people would be less inclined to consider a career in forestry, which would further exacerbate the current problems faced by the sector of an ageing workforce and recruitment difficulties.</p> |
| Different approaches to applying policy | |
| 20. | <p>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> |
| | <p>Our preferred option would be for restructuring of some existing woodlands so as to improve biodiversity, rather than permanent removal of woodland in England. It is essential that England's forests and woodlands continue to play their part in the fight against climate change and to support wood processing businesses by providing sustainably produced products which also contribute to climate change mitigation by storing carbon throughout their service lives.</p> |
| The role of compensatory planting | |
| 21. | <p>What is the appropriate role of compensatory planting in this policy?</p> |
| | <p>Compensatory planting must be guaranteed in all cases where permanent woodland removal is considered necessary. As stated above, there must be no net loss of productive forest or woodland in England as a consequence of restoration or expansion of open habitats; indeed, there is a compelling case for increased woodland creation in England to counter the adverse effects of climate change. Accordingly, if open habitat restoration and expansion is to be publicly funded, then so must compensatory planting.</p> |
| Factors to consider when deciding which policy is likely to work best | |
| 22. | <p>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> |
| | <p>Probably; although there are questions relating to the appropriateness and reliability of some of the information which may be used to determine policy.</p> |
| Implications for delivery mechanisms | |
| 23. | <p>Have we missed any major implications for delivery mechanisms? Would any be particularly welcome or unwelcome to you?</p> |
| | <p>As stated above, wood processing businesses in England are strongly opposed to any policy which would see significant loss of productive forest or woodland. For the reasons already given, there should be a presumption against permanent removal of productive forests/woodlands and in those cases where removal is justified, then there must be a guarantee of compensatory planting on a like for like basis. The impact of deforestation policy and associated incentives on the private woodland sector must also be carefully considered.</p> |

| No | Question. |
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| Other comments We welcome your input on any other aspect of this consultation. | |
| It is essential that where permanent forest or woodland removal is being considered, especially in the case of productive woodland, that a very thorough review of all options and material facts is made. In all cases, compensatory planting, so as to ensure no net loss of forest cover, must be guaranteed. Above all, permanent removal of woodland or forest must be considered as a last resort and every effort must be made to maintain, or if possible, expand woodland and forest cover in England. Too much is at stake to do anything other than this. | |

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.