

**Scottish Forestry Strategy**  
**Second Public Consultation – Response by Forestry Commission Scotland**  
**(August 2006)**

<b>Consultation Comment</b>	<b>Response</b>
Broaden the title to include trees and woodlands as well as forests.	We understand the desire to make the title more inclusive. However, on balance we feel retention of the existing title will provide continuity between the Scottish Forestry Strategy (SFS) 2000 and the 2006 revision. The term “forestry” embraces trees, woodlands and forests although we will consider the addition of a “strap-line” to see if this would add value to the title.
The draft SFS was too complex.	We will simplify the layout and content of the document. In particular we will move the “Context” chapter to the Appendix and will improve the “flow” of the Key Themes.
Too verbose and turgid.	We will undertake further editorial work to help address this point.
Tries to be all things to all people.	A very broad range of benefits flow from forest management and one of the strengths of forestry is its ability to perform a multi-functional role. However, we will identify <u>priority</u> actions within each Key theme.
Is it the role of the SFS to scroll down to the level of individual trees or clumps of trees?	If individual trees or clumps of trees have strategic importance (for instance “Heritage” or veteran trees) then we feel it is appropriate to include them in the Strategy.
Too people-focused (anthropocentric).	We recognise that many of the environmental benefits of forestry are important in their own right. However, we also feel it is important to relate those benefits to people, either directly (e.g. enjoyment) or indirectly (e.g. funding requirements). We will seek to clarify this in the text.
Time-scales too short.	In seeking to establish the immediate relevance of forestry we accept that the long-term nature of it has been understated. This will be rectified in the revised text.

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Interchangeable terminology has caused some confusion, particularly on – Historic environment/cultural heritage, native woodland/native species, and woodland/forests/plantation.	This is a valid point and we will seek to clarify this and retain consistency throughout the document. However, we feel that the distinction between forests and woodland is simply an artificial “construct” and that they should remain interchangeable. On the other hand we accept that “plantation” has a narrower definition. The Glossary will reflect our definitions.
Lack of evidence base.	To keep the Strategy concise the web-based Context paper and the Forestry Commission Scotland (FCS) web-site (with links to other sites) have been treated as the primary validation resources.
An overall land-use strategy is required rather than a collection of sectoral strategies.	We appreciate the point being made. Mechanisms such as the 2007-2013 Rural Development Strategy and the Rural Development Programme indicate a more integrated approach to land-use matters. However, the forestry Strategy extends beyond land-use and we will highlight this in diagrammatic form.
Linkage with the Scottish Rural Development Strategy/Programme and the Forward Strategy for Scottish Agriculture is not good.	The linkage between the SFS and these strategies is closer than ever. No associated, major changes to the text are envisaged.
The SFS includes tactical as well as strategic detail.	We recognise the tension between a delivery plan and a strategic plan. We will seek to remove tactical details from the text and add a section outlining the intention to develop an Implementation Plan following the launch of the Strategy.
Emphasis should be on existing woods rather than new woods – e.g. better management via thinning and emphasis on quality.	We believe both are important. We will deal with planning and forest management issues in a generic Delivery Mechanisms section.
Weak on “delivery”.	We recognise this point and will revise the Delivery chapter accordingly.

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Uncertain about what the SFS requires people to <b>do</b> .	We will revise the Key themes to ensure that required actions follow-on smoothly from the “Purposes” of each theme.
Each Key theme should have “How”; “By whom”; and “Cost” sections.	<p>Following this feedback we piloted the addition of “How” and “By whom” sections. However, these confused, rather than clarified, the strategic key purposes of the SFS and led to significant repetition. However, we will add to a revised Delivery Mechanisms chapter to outline the main delivery partners at a strategic level.</p> <p>As a strategic document, with potential funding from a range of budgets outside FCS’s direct control, we feel it would be inappropriate to prescribe “Costs”. The intention is to indicate the direction of travel rather than scroll down to a tactical level of detail.</p>
Rationalisation of Key themes.	We are persuaded by the arguments in favour of some rationalisation, re-naming and grouping of Key themes.
Lack of prioritisation. How will conflicts be resolved? (100 headline action points)	We recognise this point and will aim to highlight priorities for each Key theme. However, conflict resolution will be a local/regional matter as the relative importance of objectives will vary across the country.
Insufficient/inadequate targets and indicators.	A balance needs to be struck between aspirations and targets. We believe the Strategy should set out the direction and the broad pace of travel, with sufficient Indicators to describe progress. However, the subsequent Implementation Plan can set objective, time-bounded targets aligned to resource availability. At both the Strategic and the Implementation level we are committed to an open and transparent reporting process.
Scottish Executive’s economic imperative was not reflected in the draft SFS.	The draft Strategy aimed to deliver sustainable economic growth on a range of fronts, not solely timber. However, the Executive’s top priority of sustainable economic growth will be given more attention in the revised text.

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Major gap between aspirations and current resources. The draft SFS indicated a need for greater public spending at a time of potentially reducing resources.	The Strategy is intended to be an aspirational document. Resource limitations are a fact of life and these will be reflected in the detailed, shorter-term targets included in the proposed Implementation Plan. In the medium- to longer-term a function of the Strategy is identify where we would like to be and that might indeed indicate a desire for more or different resources.
Have potential partners agreed their roles?	FCS has a good working relationship across a very broad range of current and potential partners and is confident that the Strategy will add to the synergies that already exist. However, it is intended to be an aspirational document, serving as a basis for continuing discussions with existing partners and a catalyst for forging new relationships with other players. By its nature it needs to be allow for opportunism.
There should be greater emphasis on working with partners, e.g. health sector.	We agree there needs to be a strong emphasis on working in partnership and we will reflect on this when revising the text.
Insufficient alignment with the Planning process.	We will strengthen this component of the Strategy.
Insufficient attention to research.	We will strengthen this aspect of the Strategy.
<p>The respective roles of the UK Woodland Assurance Standard (UKWAS) and the UK Forestry Standard is unclear.</p> <p>Particular (potential) concern was expressed about Land Management Contract Tier 2 payments not being required to conform to the UK Forestry Standard.</p>	<p>We will clarify these roles.</p> <p><u>All</u> publicly funded forestry in the UK is required to meet the UK Forestry Standard.</p>
Level playing field required with agriculture.	We recognise the point being made but suggest that the direction of travel is headed that way. No changes to the text are envisaged.

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Level playing field required between the national forest estate (managed by FCS) and the private sector.	The broad principle is that FCS will seek best value for the Scottish Executive via a range of delivery mechanisms. With 35% of the woodland area in Scotland, the national forest estate currently receives some 35% of the cash resources allocated to forestry by the Scottish Executive. In addition Scottish Forestry Grant Scheme support for the non-state sector is growing at a much faster rate than for the national forest estate. No changes to the text are envisaged.
Too FCS focused.	We will take this comment on board although one of the purposes of Forestry Commission Scotland is to take a lead role. We will clarify that this is a Forestry Strategy for <u>Scotland</u> and we will also clarify the roles of the various forestry sectors.
<p>a) Clarify role of national forest estate.</p> <p>b) Issue of the national forest estate as a competitor (e.g. in recreation provision) rather than a facilitator.</p> <p>c) Uncertainty (and concern) about how the composition of the national forest estate will change to 40% native woodland.</p>	<p>The Delivery section will be revised to clarify the purpose and ‘direction’ of the national forest estate.</p> <p>This point will be addressed by comments made for a)..</p> <p>The longer-term vision will be re-worded.</p>
Abolish FCS.	There have been many different, conflicting views on this. It is a matter for Ministers to consider.
Confidence issue (lack of) within private sector and industry.	We fully recognise the need to take people with us. Without the support and confidence of woodland owners the full benefits of forestry will not be realised. Revisions to the text will help address this issue.

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Surprise at extent of the social agenda, particularly health and education. Questions about forestry’s “competence” to be involved in this arena.	State support for the forestry sector is conditional on it achieving significant public benefits. One area in which it can certainly do so is the social agenda. An aim of the Strategy is to increase forestry’s <u>contribution</u> to that agenda, guided by the competent authorities. Some minor text changes will help to clarify this.
Strong concern about the negative slant given to non-native conifers and private woodlands.	We do not wish to create such an impression, although neither should we ignore the environmental issues caused by some of the forest design and operational practices of the past (both of which apply as much to the national forest estate as they do to non-state forests). Some minor text revision will help to clarify this.
Concern expressed at moving too far towards a “service” economy (balanced by concern that it is has not moved far enough).	It is a matter of judgement where the balance should lie. We accept that the direct economic benefits of forestry are substantial and that new developments, such as wood fuel and sustainable construction, offer significant opportunities to enhance the economic performance of forestry in Scotland. The revised text will accommodate this point.
Insufficient attention to timber aspects.	This was a matter of widespread concern, and not just from “industry”. There were, however, converse concerns. With timber’s unique environmental credentials we would not wish to underplay its significance and role in the Strategy, and this will be reflected in the revised text.
Concerns about 8-8.5 m m3 sustainable yield – derivation, level and achievement.	We believe there is a need for a predictable and consistent supply of timber. Preliminary investigations have shown that the figure of 8 –8.5 m m3 per annum is achievable, with opportunities for further growth. However, a group, including representatives from the forestry sector, will examine the role of the market, incentives and the national forest estate in achieving the “smoothing” of timber production. It will also assess what further information is required to validate the growing-stock data. Text changes will address this point.
Strong concerns that the “productive” area of forests is being reduced significantly.	We accept that if timber production is to be “smoothed” and increased then the productive timber potential of forestry in Scotland must be maintained. This will require a mix of area and productivity considerations (land quality and genetic gain) and a mix of market-led responses and incentives. This will be clarified in the revised text.

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Concern that there has been too much focus on Carbon sequestration.	Forestry’s contributions to climate change issues are set out in Scotland’s Climate Change Programme. Carbon sequestration is part of that commitment. We agree that product substitution (e.g. in sustainable building construction or for energy) and adaptation are of particular significance to the way in which forestry can help address climate change considerations. No major changes to the text are required.
Concern that environmental targets are not sufficiently challenging, particularly on Plantations on Ancient Woodland Sites (PAWS), native woodland expansion and accessibility targets.	As with timber, there were also converse concerns that the environmental targets were <u>too ambitious</u> . A judgement needs to be made on priorities within current resources, coupled with our longer-term aspirations for a balanced, sustainable forestry sector. As described in earlier comments we will revise the text so that tactical issues are taken forward in the proposed Implementation Plan, leaving the Strategy to indicate the broad direction of travel.
Concern about expansion on to better agricultural land.	The Land Management Contracts (LMC) process, coupled with an even closer relationship between members of the Executive’s Environment and Rural Affairs Department ‘family’ (which includes Forestry Commission Scotland), as part of the On the Ground programme, will strengthen integrated decision making and integrated support for land management. Minor text changes will address this point.
Expansion targets to be broken down – particular need to identify “commercial expansion”.	The most important task is to encourage the right trees, in the right places for the right reasons and there are systems already in place to guide this process. The latter will be aided by the work done on the Commission’s behalf by Macaulay Research Consultancy Services and Forest Research. The Strategy will give strategic guidance, but tactical delivery and targets will be addressed through the proposed Implementation Plan.
Require spatial feel to expansion targets.	We believe we should be focusing on outcomes rather than prescribe on an area basis. Indicative Forestry Strategies/Woodland Frameworks, and an increasing focus on regional forums will guide this process. No significant changes to the Strategy are proposed.
Clarify the “mechanics” of species changes in private/state woodlands.	In revising the text we will clarify this point.

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Request that grants should be made conditional on UKWAS certification by 2010.	UKWAS is a voluntary certification scheme. However, there is a commitment to encourage the uptake of credible certification of forest management in Scotland. Support for certification schemes is currently under discussion as part of LMC considerations. In addition, over the next 5 years it is the intention to strengthen the link between forestry grant payments and long-term forest plans. The latter will make a significant contribution to the delivery of UKWAS principles. Text revisions will clarify this.
Request for higher standards to be required in National Parks.	The UK Forestry Standard sets the criteria for sustainable forest management across the UK, but consultation, at scheme level, will also take account of the special qualities of National Parks. We accept the need to give more explicit reference to forestry in National Parks.
Suggestions that diversification of forests should be through afforestation rather than changing the composition of existing forests.	Both mechanisms are required to fulfil the range of objectives in Scottish forestry. No change to the text is envisaged.