

## This is the Institute of Chartered Foresters' response to the Woodland Policy Enabling Programme Consultation September 2013.

The Institute is the Royal Chartered body for foresters and arboriculturists in the UK. We have over 1,300 members who practice in every branch of forestry and arboriculture and related disciplines.

Over four hundred of our members work in one or other of the public forestry bodies affected by the issues covered in this consultation.

### **Public Forest Estate**

*1. Does the draft document 'Towards a new public forest estate management body' adequately reflect the conclusions of the 'Government Forestry & Woodlands Policy Statement'?*

*- If so, in what way?*

Broadly yes, in terms of giving the new organisation a clearer mandate and freedom to deliver than exists with the current arrangements.

*2. What are your views on the proposed mission and objectives for the new organisation (see Annex A of the draft document)?*

These are generally clear.

However, the lack of reference to timber and wood production in the economic objectives appears strange. This might be because it is 'assumed' however timber production is a primary management objective in many Estate woodlands and this should be explicitly stated.

There is also no implicit or explicit reference to support of the timber industry more generally, as has in practice often been the case in the past. This again may cause some concern given the Estate's dominant position in the market.

If the aim is to make the Estate more independent then I think these changes are perhaps inevitable. However in terms of gaining support from the sector it might be better if there were more explicit reference to forestry, woods, etc under the economic and environmental objectives – at present the only time one of these terms occurs is under the social objectives.

Surprisingly there is also no reference to climate change anywhere in the document; given that forests are seen as having a significant role to play in the adaptation strategy, the Estate must be seen as having a key role in its delivery. ICF recommends that this is made a third environmental objective along with the provision of ecosystem services, such as carbon.

ICF also recommends that it is clearly stated that the new body will actively participate with the wider forestry sector. It may be necessary to be 'arms length' from government but it should be in close partnership with industry. For example it should play a leading role in the Grown in Britain initiative and wider campaigns to control pests and disease.

The ICF strives to continually expand and improve the professionalism in the forestry and arboricultural sector and ICF would like to see mention that professional staff are at the heart of the organisation.

Finally the Estate has often provided sites for Forest Research to operate, indeed for forest-related research more generally. ICF recommends that this should be recognised as part of the role for

the new body. This is separate from the 'learning' element included under the Social Objectives, since the research might be into economic or environmental questions as well. Specific provision should be made for the new body to buy or fund research and purchase of research advice.

*3. It is proposed that the new body will have clear statutory duties, powers and functions focused on maximising the economic, social and environmental value of the Estate, including a requirement that it should improve the financial sustainability of the Estate. What are your views on how the new organisation could improve the financial sustainability of the Estate?*

Financial sustainability will be critical to the survival of the new body; but it must not be at the expense of the other values if the Estate is not to go back 50 years. Cost cutting should not lead to unsustainable management, habitat degradation or the full timber yield not being harvested.

The new body must maximise the use of its growing stock, feeding existing and supporting new markets, working with the wider forestry sector, wood fuel and play its part in innovation in the wood using sector.

The new body has the scale to be a catalyst and leader in developing new markets and getting the wood out of the forest and into products, it must re-invigorate its harvesting and market skills and especially with hardwoods and in smaller woods, however difficult the access.

The new body should also explore all of the income potential from recreation/social use of the forests and work with local partners to deliver collaborative schemes for example with the visitor economy.

Finally it will be professional foresters who will ensure the financial stability of the new body and they must be numerous enough and well resourced enough to do this job.

*4. What are your views on the significant assets and disposals arrangements set out in the document?*

This is obviously a highly sensitive area, but we agree with the approach outlined. The new body must have the ability to sell as well as buy new assets, but this must take account of local as well as national considerations. We don't think though that what counts as 'significant' should be specified in the Charter, since this would be a hostage to fortune (in either direction). Better to require the definition to be developed by the Guardians/Board in the first year, with the proviso that any subsequent changes to this definition would have also to be approved by Secretary of State.

*5. It will be necessary to give the new body a new name because Forestry Commission is established in law as a cross-border body. Do you have any ideas on a suitable name?*

The Forestry Commission brand is both well known and well respected with the public and loss of this name should be very carefully considered. ICF feels that it would be best if further work could be carried out on this issue.

*6. What are your views on the arrangements proposed for the new organisation's accountability to Parliament?*

The description as it stands does not sound that different to at present, so much will depend on the detail in the legislation. It must be clear that the Secretary of State and Defra really are expected to have a hands-off approach.

*7. What are your views on the proposed Board's remit, size and composition?*

Given that there are also the Guardians, the Board should be kept relatively small and focussed on managing the organisation, with broader representation of interests provided by the Guardians. Whilst many skills are required for a board of this kind, it must have significant forestry-related skills within its membership.

*8. What are your views on the Guardians' remit, role, numbers and composition?*

This will need to be larger and with wider sectoral interests than the Board, but should not be more than about 10-15 people; they should be individual appointments, not organisational representatives; and should reflect the spread of the Estates objectives in order to judge its condition. There would be a clear time commitment expected from the Guardians, which might involve meeting attendance, but perhaps more importantly would involve reviewing activities, reporting on the work and condition of the Estate.

The guardians, as with the board, should include specialist forestry skills. It will be a body that advises on the management of the Estate and the makeup of the guardians must reflect this.

*9. What are the most important things to put in a public charter for the new organisation?*

ICF considers the following to be key:

- How far the organisation is allowed to be independent.
- The need to ensure that all three objective areas are delivered.
- Clear role for the Guardians (and where the limit of their role is vis a vis the Board).
- The timeframe over which the Board would be able to plan.
- Clarity around disposal and acquisition

*10. Do you have any general comments that you believe would be of assistance in creating the new organisation?*

It is indicated that the new body will be of similar size to the existing Forest Enterprise. It is essential that it is no smaller than the existing organisation which has seen recent cuts to its resources; it must have enough resources to manage its new responsibilities and thrive.

However in judging this the input from Forestry Commission Central Services must be included in the size estimate. Otherwise the net result will be a smaller number of staff doing the work at the forest level.

When the new headquarters functions (back office only) are being considered, the scope for cooperation with other bodies to reduce the overall administrative burden should be explored.

ICF would encourage the new body to work very closely with us to ensure that it functions and develops with and for, the wider sector.

FE currently uses, in a number of localities, consultative panels as a means of civic engagement and stakeholder input. It may be assumed that these will continue under the new arrangements, but clarification is required.

### ***Forestry Functions in England***

*11. The forestry functions review concluded that the current arrangements 'complicate governance and obscure a clearer "line of sight" between forestry and woodland policy and delivery'. What do you think should be done to address this?*

Insofar as separate forestry policies are developing within England, Scotland and Wales this needs to be reflected in the bodies charged with implementing them. The current arrangements are unsatisfactory because they reflect neither a coherent GB policy and implementation approach, nor a fully devolved one. Some aspects do still need to be delivered at a GB level (see below) and we need to avoid cross-border inconsistencies where possible, but otherwise clear separation of the delivery bodies in each country seems desirable.

*12. What more do you think should be done to improve the efficiency with which government's forestry functions are delivered?*

The most efficient option would be to deal with forestry at a GB level but devolution has made this difficult to achieve. However, there are key functions that *must* continue at a GB level. ICF recommends that these include: plant health, forest research, sector statistics, cross border forestry standards, Continuous Professional Development and international commitments.

There needs to be a clear commitment from the three country administrations on this and guaranteed funding with long term plans to give confidence to the bodies in each nation and the wider sector.

Providing advice, administering grants, regulating standards and developing incentives can be managed better at country level. Forest Services should remain as a separate stand-alone body, carrying out these tasks and using its knowledge and expertise to champion, protect and increase benefits from both public and private woodlands.

*13. Would you like to make any other comments about the conclusions of the review of forestry functions in England, including on any impacts of the creation of the Public Forest Estate management body.*

As with any review of this kind coupled with resource cuts, morale has been hardest hit. Both the FS and FE have huge expertise and this must be harnessed to manage England's woodlands sustainably.

This is an opportunity for FS and FE to work in a new way together for the benefit of the PFE and for the wider sector.

### ***Cross-Border Functions and Shared Services***

*14. Would you like to make any other comments at this early stage about how setting up the Public Forest Estate management body and advancing the conclusions of review of forestry functions in England might affect:*

*a. Forestry Commission's cross-border functions; and/or.*

Current responsibility for these functions is not clear from outside the FC and sometimes from within. Maintaining cross border functions is essential but clarity is needed over its management and where the centres of excellence and points of contact are.

*b. Forestry Commission's shared services; and/or*

If it is possible these should be maintained where they can provide services at least as efficiently as separating them.

*c. Forestry Commission England's National Office.*

A national office will be required and the more continuity with the existing national office the better. Sharing with other FC bodies seems sensible as long as there is clarity for stakeholders.

*General comments*

*15. Would you like to make any other comments about any aspect of this work?*

The new public forest estate body must not be burdened with the debts and liabilities of the past and should have an adequate dowry from Treasury; otherwise it will never be able to invest in its own future sustainability.

The ICF knows from experience and from what our members tell us that the professional expertise of the various Forestry Commission bodies is one of its greatest assets. Cuts to staff numbers have threatened this professionalism but the proposed changes present an opportunity to regain that. Any change must ensure the professional forester cadre is robust and resilient and at the heart of the new organisations.

Institute of Chartered Foresters  
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