

**If responding on behalf of an organisation please give its name**

Save Sandlings Forests Campaign

**Does the draft document 'Towards a New Public Forest Estate management body' adequately reflect the conclusions of the government 'Government Forestry & Woodlands Policy Statement'? - If so in what way?**

Save Sandlings Forests campaign, the Forest Campaign Network, and many others campaigned for an expanded PFE run by a fully resourced Forestry Commission. And we have argued for a properly funded FC to evolve and continue to carry out its important functions for the benefit of all our woods and forests.

We are not convinced of the need to split up FC. It has evolved and developed over nearly 100 years as an exemplar of multipurpose forestry and forestry expertise: in running the PFE, in promoting and providing advice on forestry and woodland management, and in research and policy.

We are disappointed at the recommendations of panel, taken up by government, to fragment FC and increase control of the Secretary of State over the fragments. We are disappointed that the PFE is to be run by a new public body rather than FC and are concerned that such an organisation would be vulnerable to further hiving off or privatisation.

We agree that the PFE should be run by a public corporation, but that is what Forest Enterprise England is at the moment, although for some reason we cannot understand it has only recently been allowed to carry over money from year to year. We agree that the organisation running the PFE should be managed on a day-to-day basis separately from the rest of FC, but this is how FEE as an executive agency is managed at the moment. We see no advantage in establishing a new non-departmental body, a type of public body which many describe as a quango: we see only disadvantages to those who care about and benefit from our public forests.

The Public Administration Committee criticised many aspects of the

government's public body's reform programme 2010-12, including doubting whether it achieved accountability or cost savings, and amongst other things said in its report in 2011:

"97. We believe that the Executive Agency model offers a possible solution. It allows ministers direct responsibility for policy, combined with the ability to influence it, while still enabling high quality "day-to-day" accountability by stakeholder groups."

(<http://www.publications.parliament.uk/pa/cm201011/cmselect/cmpubadm/537/53709.htm#a10>;  
<http://www.parliament.uk/business/committees/committees-a-z/commons-select/public-administration-select-committee/news/new-report-quangos/>).

It is ironic that this government is proposing to scrap one executive agency (Forest Enterprise England) which is doing a good job of being accountable and providing excellent value for money and turn it into an arms length body, particularly in the light of this respected committee's recommendations.

We are also concerned that the staff who are responsible for making the FC and FE so successful at running the PFE will be disadvantaged by this change, with the loss of civil service status, potential worsening of pensions (unless staff remain in the civil service pension scheme by admitting them to Schedule 1 of the Superannuation Act 1972) and terms and conditions, and this could lead to loss of expertise and an impact on the quality of service.

We see no reason why the PFE should not continue to be run by an executive agency, a public corporation, forming part of the Forestry Commission. We would prefer the FC to be UK wide (as far as is possible in the light of the separation of Wales, and the potential separation of all or part of FC Scotland), but at the very least we would want to see FC England continue as the organisation responsible for forestry in England.

The draft document, 'Towards a New PFE MO', reflects the government's 'Forestry and Woodlands Policy Statement' and takes establishing it a step further. We're not happy about all that is happening, but welcome the opportunity to express in discussions

with FC and DEFRA and in our response our concerns and aspirations for the new body.

**What further development is needed for the Management organisation?**

A lot more detailed work and consultation is needed in developing the PFE MO. We believe that the legislation is crucial to its future, and that there must be full consultation on what it contains and on the charter, funding, business plan, framework agreement and other documents and details. The legislation should determine all aspects of the organisation's remit, funding, governance and objectives.

**If not, what are your views on the proposed mission and objectives for the new organisation (see Annex A of the draft document)?**

The mission and objectives are very important, and should flow from the legislation. The legislation, mission and objectives should include a clear definition of the multiple purposes and benefits of PFE, ensuring a sustainable balance of economic, social and environmental objectives.

The draft document in paragraph 16 is disingenuous and misleading in suggesting that the current remit that the FC follows in running the PFE is limited to forestry focused activities. In fact since the 1980s the legislation has been amended to include the 'balancing duty' which requires account to be taken of environmental matters as well as forestry. However the current legislation does need updating to include social objectives, and this clear statement of the 3 strands is welcome. Of course, FC has for a long time been meeting all 3 objectives, as is required under world standards of sustainable forestry.

In our view the draft mission and objectives are well expressed, except that we would want to amend the mission to say:

"to protect, improve and expand the public forests..."

PFE should continue to be run as an exemplar of sustainable forestry and land management.

**What are your views on how the new organisation could improve the financial sustainability of the Estate?**

We agree that the economic, social and environmental value of the estate should be maximised, but this should be done in a careful balance between all 3 aspects, and that should be made very clear in the legislation and objectives.

We are not happy with the requirements to 'improve the financial sustainability of the estate' as that is a euphemism for reducing the amount of public investment. We do not believe it is appropriate to expect the PFE to move towards fully funding itself.

Funding and money raising are absolutely key issues for the PFE MO.

It is essential that there is transparency on these matters, and there should be consultation on the business case.

The government should continue to pay for PFE to provide public benefits, in recognition that areas of the PFE providing primarily social benefits, access, recreation etc, and environmental benefits for wildlife cannot fund themselves, and in fact cost more to run than those areas that produce timber or other economic benefits.

If we want our public forests to benefit people and nature then we must pay for them. A mere £20 million a year is all that is needed (as has been established by ecosystems valuations, and the panel asserted in its report that the PFE needed £22 million a year), and people made it very clear during the campaign against selling off the forests that they would be willing to pay the 40p per person per year that amount of investment would cost taxpayers.

In calculating the costs and benefits of the public benefit aspects of

the PFE, including access and biodiversity, all of the benefits should be fully costed and valued. In doing so the widest range of benefits should be examined, including for example the benefits to health from public access allowing people to take exercise and relaxation in our public woods and forests.

We want to see PFE expanded, with appropriate funding, so that the public benefits it provides can be available to even more people closer to where they live, and to benefit the environment – including wildlife, climate change mitigation, sustainable energy sources and flood prevention.

Payment to the PFE to provide public benefits should be in the form of a clearly defined contract, entered into in the long term. As the government statement says on page 27:

- Any Government investment will be predicated on the delivery of agreed outcomes set out in a multi-year framework agreement covering both commercial performance and the delivery of public benefits such as access and biodiversity.

We are concerned to see in paragraph 27 of the 'Towards...' document that as well as a long-term framework it is proposed there would be shorter funding agreements linked to the spending review. This militates against allowing the PFE MO to carry out sustainable forestry on a long-term basis free from government interference, and suggests that there is an intention to squeeze the funding for these important functions.

We are alarmed to read in paragraph 28 of the 'Towards...' document the suggestion that the organisation would return dividends to the government on trading income, and believe this is wrong, unnecessary and unacceptable. It contradicts the idea that the new PFE MO would be independent from government interference in operational matters. If the PFE MO increases its trading income, which we believe should be done in careful balance with social and environmental objectives, then it should invest that

money in expanding and improving the state and its infrastructure, and in establishing financial reserves as would be appropriate for prudent business management.

We are very concerned that the requirement to produce a dividend will distort and put pressure on the PFE MO to sweat assets to an unacceptable level, putting at severe risk the value of the PFE to people and to nature, and risking destroying what we value.

The Treasury rules on public corporations and dividends should be interpreted and applied to the PFEMO in a way appropriate to the organisation which is being established and to the principles and objectives we all agree (i.e. independence from government interference in operation, careful balance between the three elements of multipurpose forestry). We believe it is possible, under Treasury rules, to fund the organisation on this dual basis – partly from payment for the ecosystem services and public benefits (social and environmental policy functions), and partly from trading income – without the organisation having to pay a dividend.

We agree that trading income should be separate from payment of public benefits, but not by this method.

We understand that recent ecosystem analysis of the PFE confirms what we already know from previous studies in 2009 and from the work of the panel in 2011/12 – and what FC already knew – some parts of the PFE raise money by producing timber, wood products, receipts from recreation and other activities, and other parts of the PFE not only don't raise money but they cost more to run.

This is because, for example, open habitat doesn't grow trees that can be felled to raise an income nor does it allow for money to be raised from recreation, but it does need to be expensively and artificially maintained, however such areas are considered important habitat for wildlife. And areas of newly planted mixed woodland near to urban areas are unlikely to produce timber or wood products, but can be costly to look after, and the revenue that can

be raised is very limited, however these areas are extremely valuable for the social benefits they provide.

The analysis confirms that the PFE raises approximately £50 million a year out of the £70 million a year it needs to run the multipurpose forests with multiple benefits, leaving a £20 million a year gap that would pay for those areas that don't raise money but do provide public benefits.

It is worth remembering that this £20 million is extremely good value for money, with the PFE producing at least £400 million worth of public benefits each year, probably more. And, that the PFE runs its land extremely efficiently at considerably lower cost per hectare than privately run forests receiving grants for every hectare.

The document 'Towards...' and other government pronouncements appear to give the impression that it is a new idea for the PFE to be innovative and entrepreneurial. But it is already extremely good at raising money from the PFE, and doing it in balance with other objectives.

We are deeply concerned at the danger posed by the emphasis on maximising economic value from the PFE, particularly if the PFE is expected to receive less than it needs and less year by year to provide public benefits. It will be put under severe pressure to sweat the assets. It must not be pressured to raise as much money as possible at the expense of social and environmental aspects particularly access and wildlife.

There must be consultation on any new money-making ventures, and this should be explicitly stated in the documentation as the organisation is developed.

We have concerns about further extending joint ventures and partnerships to run land, encouraged by the need to raise money by

enabling access to grants. Our experience is that forestry and woodland focused objectives can be overwhelmed by the aims of narrow focused organisations, for example leading to deforestation and loss of access. This can endanger the sustainable multipurpose functioning of the forest.

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

The arrangements, procedures, and policy considerations for any asset acquisitions and disposals should not only be clear and publicly stated (in the charter), but laid out in the legislation. The Secretary of State should not have any role in relation to these matters.

There must be consultation on all proposals for land sales or disposals or swaps, at the appropriate level, in the first place in the district (ideally in the context of the forest design plan), with the Guardians having the opportunity to see any controversial or significant proposals and any arguments against, and having a responsibility to approve the sales, with a veto on any that are not acceptable to users and stakeholders, that reduce the size of the estate, or that go against the policy objectives of the PFE.

Any reduction in size of PFE is totally unacceptable: we believe it should instead be expanded. The document is far too weak on this point: keeping under review cumulative impact of land transactions is insufficient – there should be a bias against disposing of land in small or large parcels. Referring to the integrity of the estate is insufficient and unclear.

Land sales of any sort, significant or otherwise, in order to balance the books should be explicitly ruled out.

**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?**

We are opposed to the loss of the Forestry Commission name, brand and logo. These are well recognised by users of the PFE, across the country and across the world, and loss of that asset

would be serious. Having a distinct brand and a new logo for the sake of appearing to be a new organisation would also be expensive, wasteful and unnecessary.

If there must be a change, then "Forestry Commission England" would deal with the perceived issue that the Forestry Commission is a cross-border body, but at the same time would retain the brand.

Failing that Forest England is the least worst option, and at all costs any name potentially including an apostrophe should be avoided.

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

We are not happy that the PFE is to be run by a new public body rather than FC. A non-departmental public body is subject to regular reviews and to pressure to be reformed, abolished, merged or privatised. Such a body is under more direct control by the Secretary of State than the Forestry Commission currently is (as a non-ministerial government department), and this goes against the aspiration to remove the potential for interference by the government in running the PFE.

The PFE MO will be accountable to DEFRA and ministers, not to Parliament, under the current proposals. We would welcome a stronger link between the organisation and Parliament.

One suggestion we welcome and would like to see further developed is that the Guardians be required to report annually to Parliament on the state of the PFE, and for that report to be debated. Another possibility would be to require that annual report to be to a Parliamentary subcommittee, with the opportunity for a proper debate and review of how the organisation is performing against its objectives and remit.

The organisation must be accountable to the public, as it running a public asset – our public forests – which the public have made very clear they care deeply about. In addition to accountability to Parliament, the Guardians will be important in ensuring that PFE is run in the best way for public benefit, and we believe the best way

is sustainable multipurpose forestry. And equally important will be local or regional forums for users and stakeholders to hold the organisation to account in their area.

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

These matters should be laid down clearly and specifically in legislation, not just as broad principles.

We agree with the remit of the board as set out in the document.

The composition of the board, specifically the non-executive members, should also be clearly laid down in legislation. There should be a wide range of relevant experience, but this should include the requirement to include members with an understanding of sustainable multipurpose forestry (rather than forests or woodlands or other land managed on a narrow single interest basis). The requirement should be laid down in a similar way as the requirement for Forestry Commissioners to have experience and knowledge of forestry is laid down in the forestry acts. In addition it should require at least one member of the board to have experience as a forest user (from the grassroots/community).

We are content that the established practice is followed in the selection process, but this would need to be modified to ensure these requirements are met and that people are not excluded if they don't have existing experience serving as a non-executive director.

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

These matters should all be laid down clearly in the legislation.

The Guardians should have a strong remit, role and powers to ensure that the PFE MO delivers against the remit and objectives, and this should not be just looking at what outputs have already taken place, but at strategy and future work. They should oversee the PFE MO and advise on strategy and estate management practice, ensuring amongst other things that it will provide all three elements of the multiple benefits.

We would welcome a requirement for the Guardians to lay a report on the state of the PFE annually to Parliament. For this to be effective they need to be able to frank and honest, even if this means criticising the Board if it is not following the remit, or spelling

out if the government has imposed policy changes or pressures on the organisation.

In considering the composition of the Guardians, it is important to be clear on their remit and role, which is as a national group overseeing a national body that runs our national public forests, on behalf of the public. Guardians should come from a range of backgrounds and regions, so that they understand the different types of sustainable forestry in different parts of the country, but not be representatives of particular forest districts.

Guardians should understand and ideally have knowledge or experience of sustainable multipurpose forestry (rather than just of forests or woodlands or other land managed on a narrow single interest basis).

We welcome the clear statement in the document that Guardians should represent the interests and expertise of estate users and the public, which is a helpful development of the government statement referring to representatives of the community. There is a wide variety of estate users, including a wide variety of recreational users, volunteers, local communities, those benefiting from its educational opportunities, and ideally all interests would be represented among the Guardians, but not at the expense of an unmanageably large group.

The process for selecting Guardians must be open, transparent and fair, drawing on established principles for public appointments, but modified to meet the need for this group.

We don't believe that FWACs would be a suitable route for their appointment, as these organisations while extremely valuable in what they do are not focused on the PFE and do not currently have any grassroots involvement or record of involving communities and the widest variety of users in their work.

It is totally inappropriate to have people serving on both the Board and the Guardians. This would make it impossible for the Guardians to oversee, hold to account and potentially criticise the Board. It is important to have links between the Guardians and the Board, but this could be done by a Guardian attending board meetings as a

non-voting observer.

Regional user and stakeholder forums are essential for accountability, and we very much welcome the FEE's work to develop local engagement structures. These will be particularly important for scrutiny of new ways of raising income and of any proposals to sell or dispose of land or assets, as well as looking at a whole range of matters related to the running of the PFE.

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

Before considering what should be in a charter, we need to make clear that we believe that legislation is key. Legislation should determine all aspects of the organisation's remit, objectives, governance, funding and structure. This should all be spelt out in sufficient detail to avoid any distortion of the important multifunctional management of the PFE in the future, and it should be formulated for the long-term. The legislation and the charter should guarantee in perpetuity the PFE as an asset publicly owned and accessible to the public.

The legislative process must include full Parliamentary debate on the legislation and the Charter. There must be full consultation during the pre-legislative scrutiny and at later stages.

The Charter will be important to put legislation in understandable language which will help people to keep the organisation focused on its remit. 10 years is not a very long time, but at least it is longer than the life of a parliament.

If reviewed after 10 years this must be debated in Parliament in a proper debate, not just a process of negative or affirmative resolution, and the public must be informed of and engaged in the process of review. Any major changes considered for the Charter should also be scrutinised to see whether they change the remit laid down in legislation.

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

We would like to emphasise what we think are the most crucial elements of determining how to manage the PFE for the future:

- Funding – must be fully resourced to provide public benefits, without reduction of public funding, supplementing trading income on which the government must not siphon off a dividend and which must not be raised at the expense of the benefits to people and wildlife
- Governance – a place for grassroots users on the Board and a group of Guardians with a wide range of users, with adequate powers and clear duties to hold the Board to account and mitigate against government interference
- Legislation – must establish all aspects of the new organisation's remit, organisation, funding, and must be drawn up with full public consultation and scrutiny, and be supplemented by a charter which makes these details accessible to all and can only be reviewed openly and democratically
- Accountability – to Parliament and to the people nationally and locally

**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?**

We do not agree with this conclusion. It is difficult to know what is meant judging by this question, but in the report of the review paragraph 1.4.3 and Conclusion 3 make it clearer by referring to a "clearer 'line of sight' to UK government ministers", in other words stronger control over forestry functions by the forestry minister in DEFRA.

The Forestry Commission has evolved and developed over nearly 100 years as an exemplar of multipurpose forestry and forestry expertise: in running the PFE, in promoting and providing advice on forestry and woodland management, and in research and policy. It has done this as one organisation, a non-ministerial government department, governed by the forestry acts and evolving forestry policy. We are not convinced of the need to split the organisation up and scatter the fragments.

We believe that all parts of FC are important for future of all our woods and forests and the wider economic, social and

environmental benefits to the nation and to the UK.

We would be happy to see the Forestry Commission evolve, as it has done over its history, but to do so for these benefits, not for the apparent motive of putting parts of it under closer control by the Secretary of State and saving money.

We very much welcome the conclusion that Forest Services not to be merged with Natural England or Environment Agency, and that the government's forestry functions should be kept together as an integrated whole. The best way to do this is to keep the Forestry Commission together as one organisation.

We would prefer the FC to be UK wide (as far as is possible in the light of the separation of Wales, and the potential separation of all or part of FC Scotland), but at the very least we would want to see FC England continue as the organisation responsible for forestry in England, as a separate organisation, not part of DEFRA.

We are concerned at the suggestion that an England only forestry body would be too small to be organisationally resilient. That is not necessarily true – plenty of organisations are small, but as long as they are given appropriate and sufficient powers and funding they can carry out important strategic and operational roles. However the better solution to this potential problem is to continue to carry out forestry policy on a UK wide basis, rather than fragmenting it and scattering elements to their fate.

We are concerned that moving forestry functions into DEFRA could lead to a loss of forestry focus and expertise. If this option is pursued then it is essential that they keep their identity, and that forestry policy continues to be regarded as important.

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

These functions are already delivered efficiently and well, as the panel report recognised, but as the panel also clearly stated Forest Services delivered well despite having so few staff and was “woefully underfunded” to deliver evolved forestry policy.

Conclusion 7 in paragraph 6.19 of the review document makes it clear that the pressure to achieve “efficiency” is in order to meet the government’s wider policy to squeeze and cut public services and functions, rather than any lack of efficiency on the part of the organisation, and the scale of the cuts threatened causes us fear and alarm for the future delivery of forestry policy in England. We are also concerned at the implication in the government’s January statement, though not developed further in the more recent documents, that charges for services provided by Forest Services and other parts of the FC should be considered, as we believe this could severely threaten the promotion of good sustainable forestry throughout the sector. The panel’s vision and the government’s restated policy of protecting, improving and expanding the nation’s forests will not be realised unless this wider policy changes or is not applied to forestry delivering functions.

Efficiency would certainly not be improved by fragmentation and separating forestry specialist and corporate support functions from what the review describes as forestry functions, as paragraph 6.12 in the review document makes clear:

“... Splitting up the central specialist and corporate functions currently provided under cross-border arrangements... would likely incur significant implementation costs and increase running costs significantly...”

Sharing corporate functions rarely if ever saves money: the cost of the change and the loss of experience and expert staff always outweighs any perceived savings or advantages.

Restructuring government costs money

Whatever the apparent motive for splitting up FC, it is extremely unlikely to save money. Restructuring central government bodies cannot be demonstrated to save money. The highly respected National Audit Office (NAO), in its 2010 report on reorganising central government found that rushed restructuring of government departments left transition teams little time to plan things properly, and most did not calculate transition costs or include them in reporting the cost of the restructuring. Further, the government doesn't even expect that to happen:

"There is no reporting requirement to disclose transition costs in financial statements or to undertake post-implementation reviews. The Treasury specifies a form of accounting that does not show transition costs for the creation and reorganisation of departments and agencies."

(p15, National Audit Office (2010) Reorganising central government, <http://www.nao.org.uk/report/reorganising-central-government/>)

The NAO concluded that value for money could not be demonstrated for these government restructurings. However the government appears not to have taken any notice of this.

The NAO in its 2012 report on the restructuring of government public bodies found that transition costs and value for money were still unclear, and the claimed £2.6 billion saving from the public bodies reform programme excluded transition costs which they estimated (on incomplete information provided by departments) would be at least £830 million. (p30, NAO (2012) Reorganising central government bodies, <http://www.nao.org.uk/report/reorganising-central-government-bodies/>)

We are very unhappy that the government is embarking on a major restructuring of the Forestry Commission, an organisation that has comprehensively demonstrated value for money, and that this will cost a lot of money which could be better spent properly resourcing the Forestry Commission to do the excellent work it does.

**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?**

We welcome some conclusions of the review: the ruling out of merger of Forestry Commission or any of its parts with Natural England or the Environment Agency, and the recognition of the benefits of keeping forestry functions together as an integrated whole. However a number of parts that are rather worrying, and there is a long way to go before there is any certainty about the future for all our woods and forests and the organisations needed to ensure that future is positive. We welcome the opportunity to engage in the process of considering future organisational arrangements.

Conclusion 4 in the review document, paragraph 6.11, refers to further detailed analysis of costs and benefits of delivery options. We would want this analysis to be the subject of further discussion and consultation, and as we have stated elsewhere we are not happy with the options, other than that of a reformed or evolved Forestry Commission.

We are particularly concerned at the statement in this paragraph that the Forestry Commissioners' powers and duties could be transferred to the Secretary of State "...who would then need to decide the precise form of future organisational arrangements". Elsewhere the document says that legislation might be needed for changes. We would not want to see those powers and duties transferred to Secretary of State, and believe that legislation would be required as it would be a change to the forestry acts. If this transfer were to happen then it should be the subject of consultation and Parliamentary debate, and should be only done in the light of a clear understanding of future organisational arrangements following appropriate consultation.

Otherwise, forestry could be subsumed within DEFRA and focus on it and its importance and the whole range of economic, social and environmental benefits be lost.

**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 the review of forestry functions in England might affect: - Cross-boarder functions?**

Yes, we would like to make comments on this, and do not agree that these matters are not of interest to stakeholders, campaigners

or community groups (as stated in the documents and discussions with stakeholders): they do have an impact on the delivery of forestry functions and we are very concerned about this.

It is possible that many stakeholders don't really understand these functions and their specialised nature and importance, as was demonstrated by a number of stakeholders at the National Forum in July (and in their submissions to the review) blithely suggesting that 'back office' functions could easily be shared between Forestry Commission and other conservation bodies without realising the implications.

The notes that were provided in the consultation with Forestry Commission staff, but don't appear to be provided publicly, explain these functions in more detail, with a rather worrying new artificial categorisation of some functions as "middle office" (presumably a category slightly less likely to be dismissed as something that can be delivered by anybody at any price, or something which is not worth keeping, than "back office"). The notes clearly state that:

"In practice, very few if any Forestry Commission roles are purely back or middle office, most involve an element of customer contact."

We are opposed to the "strategic alignment of back-office functions", whatever that means.

We are particularly strongly opposed to transferring the shared services into DEFRA. We do not want to see the loss of valuable expertise provided by the cross-border shared services function, which we fear would happen both because of merging these functions in with more generalist corporate services, and because people would leave to avoid the loss of skills, terms and conditions or the requirement to move away from Edinburgh. And we do not want to see these services join the DEFRA shared services function which is being privatised and off shored, with consequent impact on staff and the services they provide.

There is no reason why cross-border and shared services functions could not be provided to Natural Resources Wales (as now, as the organisation recognises their efficiency), and to any future separate organisation in Scotland if that happens, as well as to forestry functions in England.

We have concerns about the future of the rest of the cross-border functions, and our view is that they should not be separated from each other or from the Forestry Commission, but we should keep Forestry Commission GB (evolved as necessary and appropriate) as one integrated organisation, which would be resilient, efficient and best placed to deliver for forestry.

These functions, as all others parts of the FC, need to be sufficiently funded. There is little mention in these documents of Forest Research and the other parts of FC that are essential for tackling tree and plant pests and diseases, a major and increasing threat that we have all become more aware of, and one which doesn't recognise national boundaries.

**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 the review of forestry functions in England might affect: - Shared services?**

see box above

**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 the review of forestry functions in England might affect: - England's National Office**

We don't see any benefit in moving the England national office away from the current offices in Bristol, and certainly would not want to see further additional unnecessary costs incurred by such a move.

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

This paragraph appears on the webpage introducing the consultation (<https://englandconsult.forestry.gov.uk/forest->

services/wpep):

“The Woodland Policy Enabling Programme was set up by the Forestry Commission and Defra in May this year to ensure that the work to develop advice to Ministers on all these issues, and in due course to implement the changes which are made, is carried out in an integrated manner, taking full account of the implications for all the objectives of the Forestry Commission in England and the work and interests of all the staff who contribute to it. This includes the work of staff providing corporate functions and cross-border functions, including Forest Research.”

We welcome the statement, but wonder whether it is being carried out in this way. We are concerned about the work and interests of all staff, as they are crucial to the future implantation of these objectives.

And we wonder whether everything is happening in an integrated manner and whether it is taking full account of all the objectives of the Forestry Commission. It is essential that it does, for the future of all our woods and forests, and for our economy, society and environment.

However, we question the whole basis of the reorganisation: whether it is needed, and whether it will provide benefits to those who care about woods and forests.

The government doesn't seem to have listened to the recommendations of the NAO on being clear about why it undertakes restructuring.

The NAO called in its 2010 report on reorganising central government for more careful consideration of the purpose of a restructuring, including a cooling off period between making decisions and implementing them to examine whether less

disruptive or costly solutions can be found instead.

In commenting on the reorganisations it had studied, the head of the NAO said:

"... the costs are far from negligible and the reorganisations inevitably involve disruption and loss of service.

We believe a more deliberate and carefully planned process makes sense before such costs are incurred and would also like to see a slow down in the rate of change."

(Amyas Morse, head of the National Audit Office, 18 March 2010, NAO (2010) Reorganising central government.  
<http://www.nao.org.uk/report/reorganising-central-government/>)

We call for a rethink of this costly and misguided destruction of the Forestry Commission.

Summary of our submission

Future of forestry functions currently carried out by the Forestry Commission:

- We do not want to see the Forestry Commission split up into separate stand-alone fragments or fragments that are subsumed into DEFRA
- We would prefer the retention of a UK wide Forestry Commission, evolved as necessary
- We want to see the forestry functions kept together as an integrated whole, including cross-border and shared services
- We are opposed to moving the shared services into DEFRA, to face loss of expertise, privatisation and off shoring
- Any changes to the delivery of forestry functions should be the subject of consultation and legislation, and this should happen before any transfer of these functions

- Delivery of the functions should be adequately funded to avoid charges and deterioration of the service

Future management of the PFE:

- Funding – must be fully resourced to provide public benefits, without reduction of public funding, supplementing trading income on which the government must not siphon off a dividend and which must not be raised at the expense of the benefits to people and wildlife
- Governance – a place for grassroots users on the Board and a group of Guardians with a wide range of users, with adequate powers and clear duties to hold the board to account and mitigate against government interference
- Legislation – must establish all aspects of the new organisation's remit, organisation, funding, and must be drawn up with full public consultation and scrutiny, and be supplemented by a charter which makes these details accessible to all and can only be reviewed openly and democratically
- Accountability – to Parliament and to the people nationally and locally.

**Response ID**

ANON-69TR-9X8W-N