

Forestry Commission consultation
*Woodland Policy Enabling Programme – request for feedback on proposals for
the Public Forest Estate Management Organisation
and forestry functions in England*

Response from The Wildlife Trusts
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Public Forest Estate

The current proposals for the new Public Forest Estate management organisation (PFE MO) do not meet all of the recommendations and principles set out by the Independent Panel on Forestry (IPF).

The new body's overriding mission must be to realise the Estate's full potential value to people and nature. Government must enable the PFE MO to become the "exemplar" in wildlife conservation, ancient woodland and open habitat restoration, cultural heritage, access provision and community engagement the Panel recommended and public demanded.

The IPF called on Government "*to pioneer a new approach to valuing and rewarding the management, improvement and expansion of woodland ecosystems for all the benefits they provide to nature, people and the green economy*". This recommendation made it clear that new ways of accounting for all the benefits provided by forests should be adopted, at a time when the National Ecosystem Assessment (NEA) and the Natural Capital Committee (NCC) were providing the tools to do this.

However, the proposals outlined in the consultation documents fall back to a traditional approach of simply "*maximising economic opportunities whilst maintaining public benefit*". This is old fashioned language reflecting flawed economic thinking and is a huge missed opportunity. It will mean that the MO will be forced to revert to selling timber in the hope that a surplus can "pay" for other public benefits. An overemphasis on generating profit to sustain the organisation will result in unacceptable tradeoffs.

Income generation must be explicitly repositioned as a means of enhancing public value, rather than an equal and outcompeting objective. The full range of public benefits must be properly accounted for, with a hefty contingency allowance for all the essential services which cannot easily be reflected in financial valuation. This is a requirement that flows from the IPF report and should be a strong theme that runs through any proposals, yet there is no hint of this in the governance summary, its supporting review of functions or in the Forestry Policy.

The PFE must continue to receive Government funding. It is a tremendous national asset and represents extremely good value for public money: for an annual investment of about £20 million, the public benefit the Estate provides has been valued at a minimum of £400 million, which represents a 20:1 return on investment. Baseline Government funding will allow the MO to focus on its core purpose of enhancing the Estate's value to people and wildlife and prevent perverse decisions being made to plug funding gaps, such as land sales or income generating activities that degrade wildlife habitat or high quality access.

The MO's proposed mission statement contains the phrase "*for the benefit of people, the economy and nature*," which implies a balance between three competing elements that should actually be complementary. This is also reflected in the overarching objective - "*the sustainable management of the estate to balance and maximise the benefits to people, nature and the economy*". The proposals fail to recognise that ecosystems and ecosystem services underpin everything else: without healthy forest ecosystems there will be no economic and social benefits.

The PFE's main purpose should be to contribute to realising the full potential of England's current and future ecological network, so that it provides an enhanced level of the full range of ecosystem services that we depend on. In particular, the PFE should deliver those aspects of ecosystem services that are not adequately valued in traditional economic terms and/or not as easily delivered by the private or charitable sectors.

Further objectives should then articulate how the PFE MO will deliver high quality forest ecosystems, rich in wildlife, and how it will deliver benefits for people. Economic objectives must then be articulated in terms of delivering benefit for people whilst maintaining and enhancing the natural capital on which they depend. Any economic approach or valuation will have to rise to the challenge of transparent accounting to demonstrate how value is being provided to people.

The MO's administrative structure should provide the capacity and legitimacy for the delivery of public benefit. The MO must be directly accountable to the public for its management decisions and delivery of its mission. It must make transparent, evidence based decisions and have its management investments scrutinised by the Natural Capital Committee (or its successor) to ensure sufficient funding is being provided for sustainable growth of natural capital, and the best public value for money is being achieved.

There is concern that the IPF's requirement for a Charter has been weakened and that the proposed role of Guardians, who should be accountable to Parliament, has been toned down. The Guardians must represent the full range of interests for the Estate and have the power invested to prevent land sale decisions that degrade the Estate's integrity for maintaining and enhancing its value to the public and nature.

Forestry functions in England

We agree with the recommendations made by the IPF that forestry functions in England should be delivered by a public body with duties, powers and functions to champion, protect and increase benefits from woodland and forests.

Its functions should be to advise, facilitate and champion a woodland culture; regulate and implement forestry standards; develop and deliver incentives and other mechanisms to provide social, environmental and economic benefits from woodlands; provide forestry expertise to Government; promote wood as a product; be an exemplar in delivery and promote best practice.

In carrying out these functions, the body should pioneer the ecosystem services approach to value the full range of services delivered by England's woodlands. This evidence should then be used to pull in and target resources to deliver the best social value from sustainable woodland management and woodland creation. The body should also work closely with the PFE MO and other Government bodies to ensure that woodlands are considered within a coherent strategy for the country's natural environment and that forestry policy is integrated with other land use and management policies and incentives. Policy on land use and management should encourage the restoration of ecological systems and habitats on a landscape scale.