RSPB Scotland welcomes this opportunity to respond to these strategic proposals for the National Forest Estate. We look forward to subsequent dialogue and consultation on this matter, but also on the revision and implementation of Forestry Commission Scotland’s corporate plan, and for the national and Forest District Strategic Plans.

Answers to consultation questions follow.

Is this document helpful in communicating what the NFE is and what it delivers?

No.

a. Please provide some further detail on your response.

This document provides some useful background information, but unfortunately it lacks detail on overall performance against national biodiversity targets (rather than snapshots of activity) and other public benefits, and fails to provide sufficient detail on future targets.

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2 Contact: Mike Wood, UK Forestry Policy Officer, RSPB, Ground Floor Miller Building, Lochside View, Edinburgh Park, Edinburgh, EH12 9DH; tel: 0131 317 4100; e-mail: mike.wood@rspb.org.uk.

The RSPB is a registered charity: Scotland no. SC037654; England and Wales no. 207076. The RSPB speaks out for birds and wildlife, tackling the problems that threaten our environment. We have over a million members. We own and manage about 8,800 hectares of woodland in the UK, a quarter of which is in England. Our UK forestry-related work includes advocating changes to devolved country and local policies, providing advice on conservation management to woodland owners and managers, and undertaking research into birds and other biodiversity affected by forestry practices. A summary of our forestry policy work is at: http://www.rspb.org.uk/ourwork/policy/forestry/ including responses to recent government consultations.
The ‘top priorities’ identified for the next three years are insufficient to address biodiversity declines and the Scottish Government’s own biodiversity commitments.

It also unclear how this document relates to the Forestry Commission Scotland (FCS) Corporate Strategy, and FCS national and Forest District Strategic Plan revision processes, as well as any revision/so-called ‘refresh’ of the Scottish Forestry Strategy.

The document should explain what progress has been made on meeting the UK Biodiversity Action Plan and Scottish Biodiversity Action Plan targets, and reflect on the targets, objectives and approach of the National Forest Estate to biodiversity and other public benefits. Also a review of progress against Forest Enterprise Scotland’s own Environment Review\(^3\) would be helpful.

2. **Does this document provide a good overview for assessing how Forest Enterprise Scotland plans to manage, on behalf of Scottish Ministers, the land and woodlands that form the NFE?**

   No.

   a. **If not, describe what is missing.**

   This document provides some useful background information, but unfortunately it lacks detail on overall performance against national biodiversity targets (rather than snapshots of activity) and fails to provide sufficient detail on future targets.

   It does not explain how a switch to sustained timber yield will impact biodiversity objectives, planning and management in the future, for example for forest habitat creation for black grouse, habitat enhancement for capercaillie, and the restoration of Western Atlantic oakwoods, peatland and coastal dune habitats.

   Unfortunately the ‘top priorities’ identified for the next three years are insufficient to address biodiversity declines and the Scottish Government’s own biodiversity commitments.

   The document does make some positive statements about work for priority species and habitats, which we welcome. Unfortunately it is unclear if, and how, these positive works that are currently being carried out, might be

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\(^3\) See: [http://www.forestry.gov.uk/environmentreviews](http://www.forestry.gov.uk/environmentreviews)
expanded. So this document sounds more like 'warm words' showcasing existing actions, rather than a commitment to not only continue welcome progress on environmental matters, but to do so in a more extensive and strategic manner that goes to the core of the objectives and type of forest management, location and design.

This document has an unclear strategic purpose, so it gives an impression of something that may be used to rubberstamp or signal changes to the National Forest Estate that do not produce enhanced and wide-scale public benefits, including biodiversity. We do hope this is an erroneous impression, but we do seek further clarification on what are the strategic objectives of the National Forest Estate are to be, how these will be determined in relation to the Scottish Government and FCS’s existing biodiversity commitments, and how these will be turned into forest management.

3. **Do you agree with the main themes identified for management of the NFE?**
   No.

   a. **If no, please explain why you disagree.**
   There needs to be a stronger focus on the extensive production of high quality, high priority public benefits, including further ambitious biodiversity restoration works as well as biodiversity maintenance. There **needs to be a step change in progress, which raises further questions about the overall strategic directions of the national forest estate and its sustainability objectives.**

   Good biodiversity progress has been made, but there is more work that needs to be done. It is unclear how these strategic directions will achieve this, particularly for further and wide-scale restoration of habitats currently damaged by afforestation - such as blanket bog and ancient semi-natural woodland. The continued timber production focus mitigates against such an approach, and it is unclear how much further biodiversity restoration and management work the Scottish Government and Forestry Commission Scotland are prepared to undertake on the National Forest Estate. FES have carried out much positive work for biodiversity by altering some areas of existing forest management, but there **really needs to be a more radical overhaul of management objectives and budgets for wide-scale, but high quality and priority, biodiversity works.**

   This **raises questions about species selection, silvicultural approaches and systems to better deliver public benefits including biodiversity.** There is still more restructuring work to do to realize more biodiversity benefits from the National Forest Estate, but beyond this there are serious questions needed to be
addressed about future forest design and management, including dealing with biodiversity legacy issues of inappropriate and sub-optimal forest locations, design and management to deliver public benefits.

Commitments and progress on continuous cover forestry and broadleaved tree species are helpful, but insufficient. A proposed switch from 8% to 20% broadleaved tree cover is not ambitious enough to meet environmental criteria – the National Forest Estate needs to be a minimum of predominantly native broadleaves and native conifers. We have concerns that the increase to 20% broadleaves may not be of native species, which we would not welcome.

4. **Do you support the strategic directions and commitments presented in the document?**
   No.
   
   a. **If no, please explain why you do not support the directions and commitments.**
   These lack detail and are not sharply focused enough to meet national biodiversity targets in an ambitious manner, both for biodiversity restoration as well as maintenance.

   The ‘top priorities’ identified for the next three years are insufficient to address biodiversity declines and the Scottish Government’s own biodiversity commitments.

5. **Do you agree with the top priorities for developing the contribution of the NFE for the next 3 years?**
   No.
   
   a. **If no, please explain why you disagree with the top priorities.**
   **Cross-cutting issues**
   The proposals for mitigation strategies for plant health must be done in an environmentally sustainable manner, for example not causing wildlife disturbance, and be considered as part of multi-purpose forestry. Unfortunately the current focus of research and disease control measures seems to solely focus on protecting the timber resource, rather than understanding and considering the wider sustainability issues, for example related to wildlife impacts.

   The proposals for landscape scale spatial planning for addressing climate change seem to lack a necessary need to consider impacts and opportunities to help priority species and priority habitats adapt to climate change. Our concern is that this work will mainly focus on climate change modelling and tree species
selection related to timber yield, and possibly carbon sequestration and water management, ignoring biodiversity conservation. Apart from missing biodiversity adaptation opportunities, it may also drive unsustainable forest design through choice of biodiversity damaging tree species, forest location or forestry practice.

Industry Development

The switch to sustained timber yield does not explain how this will impact biodiversity objectives, planning and management in the future, for example for forest habitat creation for black grouse, habitat enhancement for capercaillie, and the restoration of Western Atlantic oakwoods, peatland and coastal dune habitats.

Sustained timber yield is not just an ‘industry development’ issue but relates to what public benefits are delivered, to what extent and how sustainably in environmental terms.

Harnessing the biological productive potential – this must be done to improve and maintain the biological condition of priority habitats and protect, increase and expand the range and populations of priority wildlife species, as well as restore the condition of designated wildlife sites. The current proposal does not give sufficient detail or assurance that Scottish Biodiversity Strategy and UK Biodiversity Action Plan targets will be key management drivers, beyond UKWAS minima for extraction and biodiversity conservation.

Renewable Energy

Renewable energy development on the National Forest Estate must be carefully located to ensure no loss or damage to priority wildlife species populations, priority habitats or designated wildlife sites. This includes not impacting existing wildlife restoration and management activities, such as forest management for capercaillie, native woodland restoration and management and black grouse habitat creation. Furthermore opportunities to restore open ground and other semi-natural habitats should be sought. We are uncertain whether ‘without unacceptable loss of environmental quality’ covers this adequately.

The RSPB also has concerns that Forestry Commission Scotland did not carry out a Strategic Environmental Assessment (SEA) for its current programme for development of renewable energy on the National Forest Estate, or an SEA of the programme of short rotation forestry trial sites.
We note that the National Forest Estate should not be considered by government as a land bank for development, but a resource to be created, managed and enhanced to produce public benefits.

**Natural & Cultural Heritage**

The ‘top priorities’ identified for the next three years are insufficient to address biodiversity declines and the Scottish Government’s own biodiversity commitments.

The commitments for 2012-2015 on biodiversity unfortunately lack ambition on large-scale biodiversity conservation and enhancement for priority species and habitats. We do welcome the two actions listed for strengthening monitoring and reporting for key species and habitats, and implementing a rhododendron control plan – it is just that other management works for priority species and habitats are required too.

The rhododendron control plan must be focused towards native woodland condition improvement to meet Scottish Biodiversity Strategy/UK Biodiversity Strategy native woodland habitats and priority species targets. This includes carrying out onward vegetation management and monitoring and co-operative and collaborative survey, management planning and restoration with owners of neighbouring woods. It must not be just focused on forest plant health disease control, otherwise urgent priority habitats and species action will be ignored, or carried out in sub-optimal or even unsustainable ways.

6. **Do you think there are any major strategic gaps or omissions from the document (bearing in mind that the strategic nature of this document means it cannot cover all aspects in detail)?**

Yes.

a. **If you think there are gaps or omissions, please outline what you think they are.**

It does not link properly with the Scottish Biodiversity Strategy, or the objectives for FCS policy, regulation, research and advice, or the work of SGRPID, SEPA or SNH, or non-state land managers.

The ‘top priorities’ identified for the next three years are insufficient to address biodiversity declines and the Scottish Government’s own biodiversity commitments.
There is further scope to develop the outreach role of FES staff, for example on collaborative management planning, ecological survey, forest management certification as well as operations. For example current work on rhododendron eradication is welcomed, but must be focused towards native woodland biodiversity condition improvement in partnership with neighbours, and not just be focused on reducing plant health risks to softwood conifer crops.

On certification and management planning, there could be scope for FES staff to work with FCS Woodland Officers to improve their understanding of certification and its potential to help drive markets and management for native woodland condition improvement.

7. Does this consultation adequately describe and provide linkage to our regional (District) and thematic (economic, social and environmental) policies and programmes?
   No.

   a. If no, please explain why you disagree.
      It is lacking in detail.

      For example how does this connect to FES's corporate strategy objectives and the Scottish Forestry Strategy and Scottish Biodiversity Strategy, but also to FES's national and Forest District Strategic Plans and their revision.

      RSPB Scotland would welcome Forest Enterprise Scotland carrying out Environmental Impact Assessment of its Forest Design Plans, alongside Strategic Environmental Assessment of its Forest District Strategic Plans. We think that the ‘management plan’ defence is no longer a robust justification for FES being exempted from environmental assessment for its forest management and expansion. It is important that environmental impacts of forest expansion and management are assessed both cumulatively and at a site level – FCS as a regulator must ensure this happens across all state, public as well as private woodland.

      The RSPB also has concerns that Forestry Commission Scotland did not carry out a Strategic Environmental Assessment (SEA) for its current programme for development of renewable energy on the National Forest Estate, or an SEA of the programme of short rotation forestry trial sites, or an SEA of its programme of land acquisition of farms for woodland expansion.
The RSPB has concerns that the current woodland expansion agenda may result in a less environmentally robust approach to assessment of environmental impacts.

We **welcome the continued consultation of Forest Design Plans** through early public discussion processes and placing draft proposals on the Public Register to satisfy FES’s own forest management practice guidance requirements, UK Woodland Assurance Standard (UKWAS) certification as well as Forestry Act requirements.

8. **If you have any other comments you would like to make about strategic directions for the National Forest Estate please provide them here.**

   The RSPB welcomes the **continued commitment to certification of the National Forest Estate to the voluntary UK Woodland Assurance Standard (UKWAS)** to meet international Forest Stewardship Council (FSC) requirements.

   We do, however, stress that the National Forest Estate objectives and forest management must be to produce biodiversity enhancement and protection for priority species and priority habitats beyond this minimum level of sustainable forest management certification. UKWAS is not designed to fully meet the priority species and habitats commitments and obligations of the Scottish Government under the Scottish Biodiversity Strategy, UK Biodiversity Action Plan, EU Birds or Habitats Directives.

   **The Scottish Government has biodiversity commitments beyond what is required under UKWAS, therefore it must ensure its stewardship of Scotland’s National Forest Estate goes beyond UKWAS’s minimum requirements for biodiversity conservation.** We also note that the Scottish Government has biodiversity commitments and obligations beyond the mandatory minima of the UK Forestry Standard and its associated Forest Guidelines.

9. **Please provide any comments you have about the draft Equality Impact Assessment accompanying the draft Strategic Directions document.**

   No comments.

10. **Please provide any comments you would like to make about the draft Strategic Environmental Assessment screening.**

    No comments.

END of consultation response.