

# Written evidence submitted by Confor (TPW0003)

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Confor ([www.confor.org.uk](http://www.confor.org.uk)) is the not-for-profit organisation for the UK's sustainable forestry and wood-using businesses. It has 1,500 member companies (half in England), representing the whole forestry and wood supply chain.

The UK forestry and wood sector is worth £2 billion in annual economic value and employs more than 50,000 people. It has the growth potential to employ many more and deliver far greater economic value while also locking up carbon.

It is vital that the UK Government recognises there is a strong forestry and wood processing industry that can help governments meet their tree planting targets - and support climate change mitigation, rural economic growth, biodiversity benefits and much more through managing our woodlands sustainably and producing more wood products.

## Executive summary

- The UK Government has a planting target of 30,000 hectares of new woodland creation annually across the UK by 2024/5. Confor set the same target in April 2019;
- Only 13,700 hectares of new woodland were created in the UK in 2019-20;
- The 30,000 hectare target is unprecedented in recent history, and challenging to achieve. Confor believes it is achievable if Government works constructively with industry;
- The UK-wide focus is welcome, but given that the UK Government has previously set (and failed to meet) England-only targets, it will require clear strategic cooperation between all administrations and an agreed approach to meeting the target;
- Scotland is delivering 80% of all UK planting. The UK Government must learn from this and honour a pledge<sup>1</sup> to introduce a 'English Mackinnon', to review processes for woodland creation applications and approvals;
- Planting targets must be part of a joined-up approach with the sector that includes more management of existing woodland and greater use of home-grown wood - as Confor said in its response to the new England Tree Strategy consultation<sup>2</sup>;
- England has a million hectares of native woodland, the majority of which is unmanaged or undermanaged. This is a huge missed opportunity for locking up carbon, increasing biodiversity and supporting more rural employment;
- There must be greater focus on planting and managing wood-producing forests, to supply timber for domestic use and reduce the UK's global environmental footprint.

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<sup>1</sup> <https://www.gov.uk/government/publications/25-year-environment-plan>

<sup>2</sup> <http://www.confor.org.uk/news/latest-news/uk-government-urged-to-put-tree-planting-targets-into-legislation/>

# 1) Are the UK Government's targets for increasing forestry coverage, and tree planting, for England and the UK sufficiently ambitious and realistic?

1.1. The target of 30,000 hectares of woodland creation across the UK each year by 2025 is the same target recommended by both Confor and the Committee on Climate Change (CCC).

1.2. Confor's [Woodland Creation Targets](#) in April 2019 (see table below) set the "ambitious, but achievable" UK-wide target of 30,000 hectares of new woodland creation annually by 2024-5. This target was adopted by UK Government in February 2020<sup>3</sup>.

	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	Total 2020-30
Scotland	12,000	12,000	14,000	14,000	15,000	15,000	16,000	16,500	17,000	17,500	18,000	167,000
England	2,000	3,000	4,000	5,000	6,500	7,500	8,500	9,000	9,500	10,000	10,000	75,000
Wales	500	1,500	2,000	3,500	5,000	6,000	7,000	7,500	8,000	9,000	9,000	59,000
N Ireland	500	500	1,000	1,000	1,500	1,500	2,000	2,500	2,500	3,000	3,000	19,000
UK	15,000	17,000	21,000	23,500	28,000	30,000	33,500	35,500	37,000	39,500	40,000	320,000

1.3. The CCC has recommended the UK should be aiming to plant around 30,000 hectares of new woodland every year until 2050. That is nearly a million hectares over the next 30 years<sup>4</sup>. It has flagged up a requirement to:

Develop strategies for each part of the UK to increase overall annual afforestation rates to at least 30,000 hectares in the 2020s.

The latest CCC progress report (June 2020<sup>5</sup>) notes this has not been done:

For the UK as a whole, rates of tree planting have consistently fallen below what is needed to achieve Net Zero by 2050.

The report also says "**...tree planting policy has failed outside of Scotland.**"

1.4. The 25-Year Environment Plan includes an 'aspiration' to increase tree cover in England from 10% to 12% by 2060 - tree cover across the UK as a whole is just 13%, around one-third of the European average.

1.5. Only 13,700 hectares were planted in 2019/20 across the UK. In 2009-10 and 2015-16 it was under 6000 hectares annually and only peaked around 13,000 hectares in 2011-12, 2013-14, 2018-19 and 2019-20<sup>6</sup>. Clearly 30,000 hectares is a huge challenge.

1.6. Previously, the UK Government set England-only targets, reflecting devolution of forestry policy. A UK-wide target can only be achieved through strategic cooperation and shared objectives across all UK administrations, which is not currently in place.

## *Scotland*

1.7. The CCC has noted that Scotland is the only part of the UK where tree planting is increasing at a rate likely to result in overall UK targets being achieved. There are positive indications that Scotland will plant 12,000 hectares of new woodlands in 2020/21 and meet its 2024/25 target of 15,000

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<sup>3</sup> <https://www.gov.uk/government/news/reassurance-to-land-managers-to-plant-trees-now>

<sup>4</sup> <https://www.theccc.org.uk/publication/net-zero-the-uks-contribution-to-stopping-global-warming/>

<sup>5</sup> <https://www.theccc.org.uk/publication/reducing-uk-emissions-2020-progress-report-to-parliament/>

<sup>6</sup> <https://www.forestresearch.gov.uk/tools-and-resources/statistics/forestry-statistics/>

hectares. Indeed, since the targets above were published, Scotland has increased its 2024/25 target from 15,000 to 18,000 hectares<sup>7</sup>.

1.8. The rest of the UK would only need to plant 12,000 hectares in total by 2025 if Scotland managed 18,000. However, Confor believes England, Wales and Northern Ireland must remain ambitious in their planting targets.

### *England*

1.9. England must plant 7,000-8,000 hectares annually by 2024/25 to help meet the overall target. However, England has only planted more than 2,000 hectares of new woodlands in one of the five previous years. Worryingly, given the UK's position as the 2nd largest net importer of timber in the world after China, Forestry Commission statistics show that less than 15% of the forest planted in England in the past five years will likely be suitable for wood production.

1.10. Confor would expect the new England Tree Strategy (ETS) to clearly set out how this large-scale increase can be achieved. In its response to the ETS consultation, Confor said this should include a regional approach to new woodland creation, building on existing initiatives like the Northumberland Forest Partnership.

### *Wales*

1.11. The Welsh Government has recently allocated resources to achieve 4,000 hectares of new woodland creation "as soon as possible", to deliver a target of planting 2,000 hectares a year. However the Welsh Government has also indicated it would like to see 100,000 hectares of new woodland by 2030<sup>8</sup>

### *Northern Ireland*

1.12. The Northern Ireland Executive aims to plant 9,000 hectares of new woodlands by 2030<sup>9</sup>, equivalent to 900 hectares per year.

## 2) Are the right structures in place to ensure that the UK wide target for increasing forestry coverage is delivered?

2.1. Confor concentrates here on financial support structures and regulatory/approval systems associated with woodland creation in England. As forestry is devolved, these vary across the UK and do not fall within the responsibility of DEFRA.

### *Financial support structures*

2.2. In its 2019 report, *Bigger better forests*, Policy Exchange wrote: "The fundamental problem in British forestry is that it must compete with other land uses that have become the norm, which are supported by greater public subsidy. The foundation for this, though not the only driver, is the EU's Common Agricultural Policy (CAP)."<sup>10</sup>

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<sup>7</sup> <https://www.gov.scot/publications/protecting-scotland-renewing-scotland-governments-programme-scotland-2020-2021/>

<sup>8</sup> <https://naturalresources.wales/guidance-and-advice/environmental-topics/woodland-management/new-woodland-creation/why-we-need-more-trees-the-benefits-of-new-woodland-creation/?lang=en>

<sup>9</sup> <https://www.bbc.co.uk/news/uk-northern-ireland-51705086>

<sup>10</sup> <https://policyexchange.org.uk/wp-content/uploads/2019/12/BIGGER-BETTER-FORESTS.pdf>

2.3. The UK Government needs to create a new system that can solve this problem in a way that offers long-term certainty to farmers and landowners seeking to plant trees.

2.4. In November 2019, Forestry Minister Lord Goldsmith offered reassurance, saying:

I understand there is concern among private landowners, land managers and their advisers in England, about committing to woodland creation until the future of grant funding is clearer. I want to reassure you that support for tree planting and woodland creation will continue to be part of this government's agenda. There is no need for concern about how woodland created now will be treated under Environmental Land Management (ELM) in the future and certainly no reason to delay tree planting. To respond to the climate emergency, we need you to plant trees now.<sup>11</sup>

Confor welcomed this<sup>12</sup> and we are working with colleagues at DEFRA to help develop ELMs to ensure tree planting gets appropriate support now and in the future. It is essential that woodland creation and management is integrated into Tiers 1 and 2 of ELMs, and that public funds for managing woodlands require a long-term plan beyond the simple achievement of short term objectives for which the grants are provided<sup>13</sup>.

### *Regulatory and administrative systems*

2.5. These are key to success.

2.6. Scotland plants more than 80% of all trees across the UK, with the vast majority (over 90%) of Scottish planting done by the private sector<sup>14</sup>. At Confor's request, Minister for Forestry Fergus Ewing MSP launched the Mackinnon Review to "...hasten the pace of application and approval of (tree) planting."<sup>15</sup>

2.7. Former Scottish Government Chief Planner Jim Mackinnon's recommendations to simplify processes and procedures for forestry applications and approval were accepted in their entirety and have helped drive up woodland creation from 4,600 hectares in 2016 to 11,000 hectares in both 2019 and 2020.

2.8. The Irish Government commissioned a similar review (by Jim Mackinnon) in November 2019<sup>16</sup> and Confor was heartened when the UK's 25-Year Environment Plan asked the then Tree Champion<sup>17</sup> to "*draw on the Mackinnon review of forestry in Scotland*" and learn lessons for England. Despite the clear benefits, a similar review has not been carried out in England<sup>18</sup>.

**2.9. An 'English Mackinnon' review should be commissioned as an urgent priority.**

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<sup>11</sup> <https://www.gov.uk/government/news/reassurance-to-land-managers-to-plant-trees-now>

<sup>12</sup> <http://www.confor.org.uk/news/latest-news/confor-welcomes-plant-trees-now-statement-from-defra/>

<sup>13</sup> <http://www.confor.org.uk/media/247770/confor-response-to-elms-pdd.pdf>

<sup>14</sup> <https://forestry.gov.scot/news-releases/tree-planting-targets-smashed-say-ewing>

<sup>15</sup> SNP manifesto 2016 page 28.

<sup>16</sup> <https://www.agriculture.gov.ie/press/pressreleases/2019/november/title,136265,en.html>

<sup>17</sup> <http://www.confor.org.uk/news/latest-news/tree-champion-appointed-following-confor-suggestion/>

<sup>18</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/693158/25-year-environment-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf)

### 3) How effective is the co-ordination between the four nations on forestry issues, including biosecurity, plant health and other cross-border issues?

3.1. Ministers from the four UK administrations regularly discuss EFRA issues through the Inter Ministerial Group (IMG) for Environment, Food and Rural Affairs. Communiqués from each meeting are available on the DEFRA website<sup>19</sup>.

3.2. There have been seven meetings of this group since the December 2019 general election. However, there is no record of planting targets (or any forestry or woodlands matter) being discussed.

3.3. This suggests co-ordination between nations on forestry and tree planting is a low priority. Given the climate emergency, ambition to achieve net zero by 2050, and UK-wide planting targets, Confor suggests the IMG should rectify this urgently.

3.4. Confor also suggests long-term coordination on wood supply is needed. The UK imports 80% of the wood it uses, the second-highest global net importer after China. As part of its post-Brexit trade strategy, the UK Government should set targets to increase domestic wood production and reduce its reliance on imports. The World Bank estimates global demand for wood will quadruple by 2050. Increasing wood supply is not simple, so a significant rise in demand is likely to encourage illegal logging in developing countries.

3.5. Biosecurity and plant health in the UK are reserved matters for DEFRA and Confor sees no need to change this. However, there will be challenges as the UK moves to new trade arrangements and away from a system of protection for British trees based on EU regulations.

3.6. To improve the biosecurity of UK trees and woodlands, Confor supports DEFRA proposals to introduce conditions requiring suppliers to meet the *Plant Healthy* management standard for public sector contracts and government grants relating to planting and restocking. Policy should be amended to encourage local planning authorities to source trees from suppliers meeting the *Plant Healthy* standard.

### 4) Why were previous ambitions for increasing tree planting in England not met and what lessons should be learned?

4.1. The previous target for England, set out in the Conservative Party 2015 general election manifesto, was to plant 11 million trees in England by the end of that Parliament in 2020. There is also an 'aspiration'<sup>20</sup> for overall tree cover in England to increase from the current level, 10%, to 12% by 2060.

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<sup>19</sup> <https://www.gov.uk/government/publications/communique-from-the-inter-ministerial-group-for-environment-food-and-rural-affairs>

4.2. Forestry Commission England key performance indicators in June<sup>21</sup> 2020 said 6,969,000 trees had been planted in England since April 2015, so the Government fell 4 million trees short of its target.

4.3. When then Forestry Minister Dr Thérèse Coffey MP gave evidence to the EFRA committee Forestry in England inquiry in January 2017, she said: ***“I am confident that we will easily meet the 11 million trees that we have said we will plant this Parliament.”***

4.4. Confor consistently raised concerns about the unambitious targets and lack of a strategy for new woodland creation, voicing concerns that [England could be in a state of deforestation](#). These warnings were not acted upon by the government of the day. The EFRA committee report (March 2017) promised to “...hold the Government to account for delivery of the target to plant 11 million trees by 2020 and to do its part to contribute towards the 2060 ambition.”<sup>22</sup>

**4.5. However, the committee recommendations on how to improve planting rates, such as setting woodland creation targets for five-year intervals until 2060, were not implemented by DEFRA or Forestry Commission England.**

4.6. There have also been specific initiatives which failed to provide any real increase in planting, such as Forestry Investment Zones (FIZs). The Government’s Clean Growth Strategy (October 2017) said FIZs would “...unlock private finance to invest in forestry by establishing forestry investment zones to offer investors streamlined decision making and more certainty, within shorter timelines.”<sup>23</sup> Confor supported the initiative and produced a [policy paper](#) (shared with DEFRA) on how and where FIZs could work.

4.7. Details of FIZs were published in October 2018 when the Government said the 'Forgotten Lands' in Cumbria would receive a boost to “help unlock the economic benefits of forestry.”<sup>24</sup> Despite promising the project would focus on “productive forestry, landscape enhancement, farming and local employment”, there has been very little progress in achieving these goals.

4.8. Lessons to learn:

4.9. The 2015 target, to plant 11 million trees in 5 years in England, was ‘rolled over’ from the number of trees planted in England during the lifetime of the 2010-2015 Government. It was not based on policy objectives, and had no ‘buy-in’ from agencies responsible for delivery.

4.10. Planting targets must be linked to policy objectives: tackling climate change; mitigating flood risk; delivering rural jobs and growth; producing timber; and building new homes.

4.11. One reason Scotland has been successful is making a clear link between more tree planting and the benefits to the economy, environment and society.

4.12. Scottish forestry has also benefited from strong, consistent political leadership. Since 2016, Scotland has had one Forestry Minister (Fergus Ewing MSP), while DEFRA has had four.

4.13. Since Lord Goldsmith’s appointment in July 2019, Confor has had very positive contact with the Minister. He took swift action in key areas, reassuring those wanting to plant trees that changing

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<sup>20</sup> <https://www.gov.uk/government/publications/25-year-environment-plan>

<sup>21</sup> <https://www.gov.uk/government/statistics/forestry-commission-key-performance-indicators-headline-performance-update-at-30-june-2020>

<sup>22</sup> <https://publications.parliament.uk/pa/cm201617/cmselect/cmenvfru/619/619.pdf>

<sup>23</sup> <https://www.gov.uk/government/publications/clean-growth-strategy>

<sup>24</sup> <https://www.gov.uk/government/news/forgotten-lands-to-receive-forestry-boost>

countryside support systems wouldn't affect them<sup>25</sup>, backing the 30,000 hectares planting target repeatedly and launching the England Tree Strategy consultation in June 2020<sup>26</sup>.

4.14. Confor has told the Minister the grants scheme must provide greater certainty on time and outcome, especially for larger planting proposals. It can take years for some applications to get approval and there is uncertainty over what will finally be accepted by the regulator. This process can be very expensive and time-consuming.

4.15. UK Government policy appears to support a range of tree planting, but in practice grants have been narrowly targeted, e.g. focusing on biodiversity and flooding. At a time when forestry grant schemes have been underspent and targets under-shot the broader benefits of tree planting must be realised.

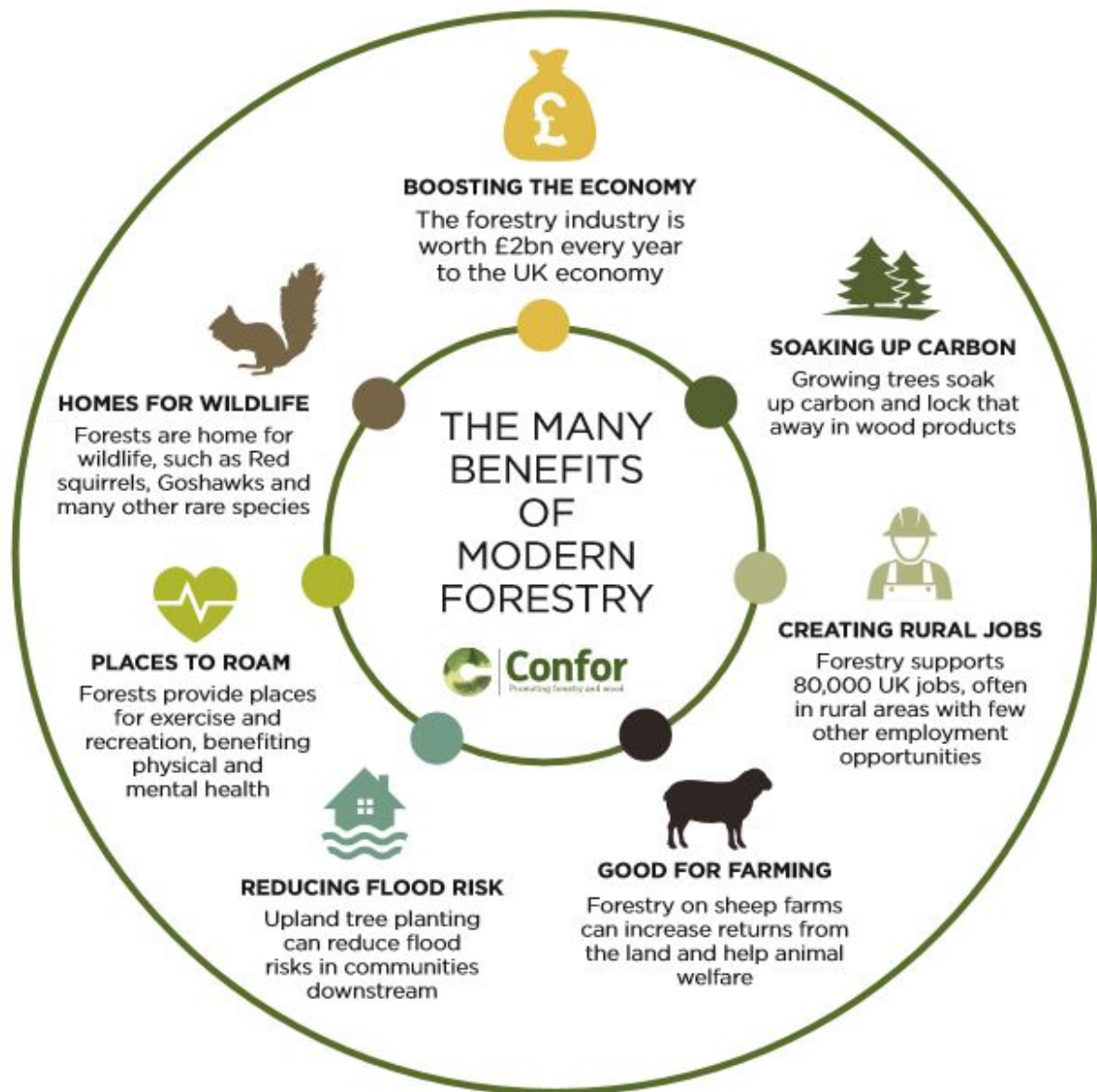
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<sup>25</sup> <https://www.gov.uk/government/news/reassurance-to-land-managers-to-plant-trees-now>

<sup>26</sup> <https://www.gov.uk/government/news/consultation-launched-on-the-england-tree-strategy>

5) In relation to increasing forestry coverage in England, what should the Government be trying to achieve? For example, how should the following policy objectives be prioritised?

5.1. Increasing forestry coverage in England does not mean either/or policy choices. Modern, mixed-species forestry delivers multiple benefits for our environment, economy and society.



5.2. We have seen during the coronavirus pandemic how forestry and woodland have been central to improving human well-being and health by providing areas for the public to enjoy the outdoors in an easily accessible environment.

5.3. These benefits can be delivered with a holistic approach to:

- Planting more trees;
- Managing more existing woodlands;
- Using more home-grown wood



5.4. At Kielder Forest, for example, productive forestry sits alongside recreational activities and biodiversity benefits, such as a protection zone for red squirrels. Rushy Knowe<sup>27</sup> is an example of new planting (145 hectares) in this area that shows how productive species can sit alongside popular tourist attractions.

5.5. These are not either-or choices; linking economic, environmental and social objectives is possible. Biodiversity benefit can complement wood production, demonstrated by Confor's latest report<sup>28</sup>, *Biodiversity, Forestry and Wood*, described as a "hugely welcome contribution" by Environment Minister Lord Goldsmith. One contributor to the report said: "We don't need to classify woodlands as 'conservation' or 'commercial'. They are definitely not mutually exclusive, but one and the same."

## 6) Are the right policies and funding in place to appropriately protect and manage existing woodlands in England? How will prospective changes to policy and legislation effect this?

6.1. Too much native woodland in England is not being managed to deliver the wildlife benefits it should. The Woodland Ecological Condition<sup>29</sup> survey shows almost all of it lacks deadwood, veteran trees or open space and around half is too small, damaged by browsing animals, and too small to be ecologically viable. If we manage our woods better, we can deliver huge benefits for nature AND reduce atmospheric carbon, because:

- There is more existing woodland than any new planting scheme could create;
- Established trees, when thinned, soak up carbon more quickly than newly-planted ones;
- Added benefits, including improved biodiversity and recreation, are immediate.

6.2. The recently-published British Woodlands Survey<sup>30</sup> found the majority of private woodland owners listed biodiversity and nature as their top management aim, but it was only those which also listed wood production as one of their activities who were managing their woods effectively to make them good for wildlife and resilient to climate change. Woodland owners *want* to help nature, but it is often wood production which provides the management plan and the income to deliver that benefit. A review of woodland created over the past 20 years in the South West Forest found that owners were unaware of the importance of active management and their woods were not providing an income stream, resulting in these young woodlands falling into disrepair.<sup>31</sup>

6.3. The Committee on Climate Change says:

There are good reasons for bringing neglected woodland into management. These include increasing resilience to wind, fire and pests and diseases, the

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<sup>27</sup> <https://www.forestryengland.uk/kielder-woodland-creation>

<sup>28</sup> <http://www.confor.org.uk/news/latest-news/biodiversity-forestry-and-wood/>

<sup>29</sup> <https://www.forestresearch.gov.uk/tools-and-resources/national-forest-inventory/what-our-woodlands-and-tree-cover-outside-woodlands-are-like-today-8211-nfi-inventory-reports-and-woodland-map-reports/nfi-woodland-ecological-condition/>

<sup>30</sup> <https://www.sylva.org.uk/bws>

<sup>31</sup> <https://www.drcompany.co.uk/latest/review-of-south-west-forest-scheme-20-years-from-planting/>

incidence of which could increase with a changing climate. Furthermore, low intensity management can help young and better quality trees to thrive, thereby aiding the sequestration of more carbon, while allowing light in can increase biodiversity.<sup>32</sup>

6.4. Policy should better link and support sustainable production of wood in our woodland. By using more wood in buildings, carbon is locked up for longer. A cubic metre of wood contains about a tonne of carbon dioxide (depending on species). If the UK uses more wood, it will have more impact by replacing carbon-intensive materials like concrete, steel and plastic.

6.5. Wood can be reused, for example in wood panels and then at end of life used as biomass fuel or in biochemical products. The UK Government should set targets for home-grown timber use.

6.6. One policy change that is needed to better protect existing woodlands is much greater control of pests damaging trees such as grey squirrels and deer. This subject was considered as part of the England Tree Strategy consultation and Confor encourages swift government action on the suggestions made for new and novel ways to stop the damage caused by grey squirrels to young trees in particular.

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<sup>32</sup> <https://www.theccc.org.uk/wp-content/uploads/2018/11/Land-use-Reducing-emissions-and-preparing-for-climate-change-CCC-2018-1.pdf>