

Written Evidence submitted by The National Farmers' Union (TPW0035)

Introduction

The National Farmers' Union (NFU) represents 55,000 members across England and Wales. In addition, we have 20,000 NFU Countryside members with an interest in farming and rural life. The NFU welcomes the opportunity to respond to the EFRA inquiry on tree planting and woodlands. Given the interests of our membership, we have chosen to focus our response on certain aspects of the inquiry.

Summary

The NFU recognises that trees (in all forms; woodlands, the wider landscape and hedgerows) deliver a multitude of benefits for farm businesses, the environment and the economy and give a strong sense of nature and wildlife in the landscape. We also recognise that farmers and growers will be key to delivering the Government's tree planting commitments outlined in their manifesto and in the 25 Year Environment Plan. In order to maximise opportunities for farmers and increase engagement on a voluntary basis, the Government must address some of the existing, historic barriers that continue to prevent engagement within the agricultural industry.

The NFU believes that under management of existing woodlands must be addressed before it is reasonable to focus efforts on new plantings. The NFU also stresses the need to recognise the environmental benefits of trees in the wider landscape as the current funding opportunities do not incentivise their role or their continued positive management. The NFU would like to see financial incentives for planting new trees outside of woodlands. Tree establishment and management is resource intensive and payments must reflect this. Therefore, it is crucial that in the future payments also reflect a fair price for the long-term commitment land managers are signing up to when deciding to plant trees. It is crucial that we always ensure that the right tree is planted in the right place. Tree planting is a long-term undertaking and it is vital that lessons of past experience are taken on board and decisions are based on sound, scientific evidence. For example, we must ensure that our best and most versatile land for food production is preserved and not planted with trees. The current permanence associated with planting trees must be urgently reviewed to encourage farmers to engage, but not lock their land in perpetuity and by doing so remove future flexibility. Finally, we must encourage and support our domestic nursery sector to deliver the increasing demand we are likely to see in the years ahead. British sourced and grown saplings are crucial to reduce the risk of importing devastating pests and diseases such as Ash dieback and Dutch Elm.

The Environment, Food and Rural Affairs Committee is seeking written submissions, by Thursday 19 November, addressing any of the following questions:

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

The Government has set out ambitious tree planting targets both in the short and long term. There's a commitment to plant 11 million trees by 2022 (extension from 2020), which was a commitment in the conservative parties 2015 manifesto. Additionally, there is a commitment to plant 30,000ha annually between 2020 and 2025, which the Government committed to in its most recent manifesto (2019). In the longer term, the Government have set out in their 25-Year Environment Plan an ambition to increase tree coverage in England to 12%, which would require an average of 5,000 hectares to be planted annually until 2060. Unless the policy and practical barriers are addressed, the NFU does not believe the above targets will be achieved.

The Government must recognise the contribution to the environment that trees in the wider landscape deliver and consider removing key barriers such as the permanence aspect of planting trees. Payments for tree planting must also be urgently addressed, in order to offer a fair value for the long-term commitment and delivery of public goods. The Government are currently focused on planting more trees, yet we have around 40% of our existing woodlands currently unmanaged (UK). The NFU

believes that the Government should offer incentives for land managers to bring existing woodland back into active management and this must be prioritised over new plantings.

There is a need to consider the impact on food production. Taking land out of agricultural production risks reducing domestic food supply and importing food from overseas to compensate, which may have been produced to lower environmental standards than is legally required in the UK.

Agriculture is uniquely placed as both a GHG emissions source and sink: we believe action to tackle climate change in UK agriculture requires a portfolio of different policies and practices. The [NFU Net Zero Roadmap](#) includes carbon sequestration and productivity measures as a means of delivering for climate change. We urge the Government to consider a comprehensive range of policies and incentives with the intention to deliver against climate change and not only to consider carbon sequestration. The NFU urges the Government policies on climate change to include productivity measures to support farm businesses to address the productivity and sustainability challenges by providing targeted investment, supporting research and development, and incentivising the adoption of technical advances that strengthen resilience within the farming sector.

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

Farmers and growers are crucial to delivering against the ambitious government tree planting targets. Currently, there are various policy and practical barriers that must be addressed in order to incentivise farmers to plant trees.

In order to plant a woodland, the land manager must demonstrate compliance with UK Forestry Standard (UKFS) as well as completed an Environmental Impact Assessment (EIA) and woodland management plan. This is a complex process and requires expert advice and guidance. Government must look to reduce the complexity of this process and offer easily available training provision and clear guidance to better equip land managers with the tools needed to understand the process.

Outside woodland, there are 13.3 million lone trees with a total canopy area of 37,000 hectares in rural England and Wales, occurring in hedgerows and fields. The Government does **not currently fund trees in the wider landscape** (lone trees, groups of trees or strips of trees etc), yet these trees deliver for the environment and are often easier to incorporate into an existing business structure. For example, the ash tree (which is the third most common tree in England), supports around 1,000 species, including wood mice, liverworts, wrens, blue tits, bats, lichens, fungi and beetles, demonstrating the environmental value of trees in the wider landscape.

The structure of existing policy means planting trees is a **permanent land use change**, reducing the flexibility of the land into the future. The NFU recommends that the Government addresses the permanency issue and creates a category of woodland that can be treated in the same way as a “crop” and thus in rotation on the land.

Finally, NFU stresses the need to **plant the right tree in the right place**. Planting trees without a clear purpose (commercial, biodiversity, carbon capture etc) and without scientific evidence to back up planting in that specific location, can lead to negative impacts on the land. Additionally, not planting the right tree in the right place can result in poor use of public monies, low establishment success and objectives not being met. The NFU believes if the Government addresses some of the fundamental existing barriers, farmers will be more likely to plant trees. Though this must always be on a voluntary basis.

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

The NFU are not best placed to respond to this question.

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

Countryside Stewardship (CS) has in recent years dominated the tree planting grant landscape, however uptake of CS has been low. When first introduced, forestry had its own mapping system that did not align with the mapping used by the Rural Payment Agency (RPA) to administrate CS which led to challenges. CS is overly bureaucratic and has been associated with high penalties and backdating of breaches leading to clawback of significant funds and as risk many farmers do not want to take. The NFU have lobbied for a simpler process and a penalty regime that is proportionate. We have previously outlined our concerns with the CS scheme and transitional asks in other committee responses, such as our recent submission to the [EAC Biodiversity and Ecosystems](#).

CS woodland creation only funds up to a £6,800 cap per hectare with low ongoing maintenance costs for 10 years, and no funding beyond that point. The minimum hectare size in order to be eligible for the scheme is three hectares, which is a significant amount of land. **There are no smaller grants available for trees in the wider landscape** through government.

Nearly 30% agricultural land in England is tenanted either on Full Agricultural Tenancies or Farm Business Tenancies. In the majority of cases, tenant farmers are unable to plant trees on their holdings due to clauses within their tenancy agreements which can expressly prohibit them from doing so. This continues to be a major barrier and the NFU stresses the need for government to address this by creating more flexibilities that allow certain trees to be treated as a crop, as mentioned above.

Around 40% of existing woodland is currently not being actively managed, this woodland must be brought back into active management and the Government must offer financial incentive to do this. Ongoing management must be encouraged and funded with any new plantings to ensure the potential of the woodland is achieved, whether that be biodiversity or carbon. Trees are resource intensive to plant and manage, and management does not stop once saplings are established. Tree planting should have a clear purpose, with a clear funding stream to ensure longevity of interest and enthusiasm to manage into the future.

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?

The priority for Government should be to create voluntary opportunities for farmers, that offer a diversified business decision with a clear financial benefit. This can be achieved by addressing some of the key barriers that have been raised in the questions above, such as the financial value addressed to properly compensate the long-term responsibility and commitment and delivery of public goods.

The Government must focus efforts on planting the right tree in the right place. For example, planting should not be at the expense of our best and most versatile land. There are also trade offs to consider where planting displaces existing biodiversity, there will be places where planting is wholly inappropriate and alternative/existing uses of land are better suited. For example, blanket bog.

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?

Around 40% of our existing woodlands (UK) not currently under the appropriate management, and therefore delivery for carbon sequestration and biodiversity or for timber production is not functioning at optimum. The NFU believes that the Government must focus efforts on establishing financial incentives to bring back our existing unmanaged woodlands into management, before planting more trees. The NFU hopes to see funding for existing woodlands in funding that has been secured for trees such as the Nature for Climate Fund and also through ELM in the future. The NFU also hopes to see trees in the wider landscape financially supported in the short-term and long-term future.

The NFU understands the importance of forestry going forward to combat climate change and believes large scale tree planting should have its own separate budget to the ELM budget due to its complexity and requirements. The NFU has set out thinking for a future environmental scheme in the [sustainable food and farming scheme \(SFFS\)](#), which outlines thinking that commercial forestry and large woodlands would benefit from a separate scheme to SFFS, which would focus on the farmed environment of lone trees, hedges, and farm woodlands.

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