

Written evidence submitted by The Soil Association (TPW0037)

The Soil Association is a membership charity, formed in 1946 by a group of farmers, scientists, doctors, and nutritionists who were determined to pioneer a world where we can live in health and in harmony with nature. Our mission is to restore nature, health, and a safe climate from the ground up. We do this by supporting a farming and land use transition to agroecology and sustainable forest management, as well as a transition to healthy and sustainable diets for all, with a radically reduced fashion and forest footprint. Today, the Soil Association works to develop, innovate and scale-up solutions for sustainable food, farming, and forestry - by collaborating with organic and non-organic farmers, foresters, retailers, processors, and food procurers from schools to hospitals to restaurant chains.

Through our trading subsidiary, Soil Association Certification, we work with over 6,000 businesses including organic farmers and growers, caterers, food processors and manufacturers. We also work in more than 65 countries to certify over 25 million hectares of sustainably managed forest globally to FSC and PEFC global standards, as well as certifying over 3500 chain of custody enterprises.

We welcome this call for evidence by the Environment, Food and Rural Affairs Committee to inform the inquiry on tree planting and woodlands. This inquiry is very timely, with the England Tree Strategy imminent, and barely a day going by, when someone isn't making a claim for tree planting and woodlands. Although there will always be a need to ensure that trees & woodlands do deliver the intended benefits when taking forward projects on the ground, the policy case for more woodlands and trees has been rehearsed many times, and broadly accepted. As the Committee correctly identifies, based on the questions that are posed, the focus now needs to be on why even the most modest targets, consistently fail to be met, despite the strength of the policy case.

We have specific views on this, and broadly contend that there has been insufficient focus on the role of farmers and farming, in making a strong contribution towards tree planting and woodland management. Our evidence to the Committee is focused on this contention and builds on our Grow Back Better recommendation (extract below), for a farmer led tree revolution. We would welcome the opportunity to be contacted for further evidence and to expand on any of our responses if this would be of interest to the Committee.

<https://www.soilassociation.org/media/21213/grow-back-better-soil-association-report.pdf>

3. Instigate a farmer-led tree planting revolution

The UK Climate Change Committee has set the target of 19% woodland cover in the UK by 2050. This should be achieved via increases to farm woodland and the rapid scale-up of agroforestry systems, with farmers leading a tree planting revolution.

Trees can be integrated into the farmed landscape in a variety of ways, from individual trees, to trees in hedgerows, to farmland woodland, to agroforestry systems which integrate trees with crop or animal production. These systems deliver multiple benefits, boosting productivity and providing environmental benefits such as improved soil health, reduction in wind exposure impact to crops, reduction in heat stress to livestock, reduced incidence of pests and diseases, and supplementary

foods for livestock diets. Ecological regeneration and food production are often said to be at odds, but they needn't be. As stewards of our land, farmers should be supported to lead the UK's efforts to increase tree cover, with a minimum of 5% of agricultural land under agroforestry by 2030 and 10% by 2040, and a doubling in farm woodland cover in the same period.

These tree-planting ambitions could be supported via government funding for a National Nature Service which supports young people to gain employment in work that supports a green recovery from Covid-19. With the crisis likely to increase unemployment rates, meaning fewer opportunities for young people, the Government should be looking to create opportunities in emerging green industries, including in the countryside. The National Nature Service would provide a training and employment programme, and grants for farmers and community groups to engage young people in projects that benefit the land, including tree-planting and agroforestry projects.

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

Target setting for tree planting and increases in woodland area has become highly politicised in recent years, with all parties and a range of other organisations making pronouncements. However, apart from new woodland planting targets in Scotland since 2016, all targets have one common feature; namely their failure to be achieved. On this basis, they can be considered to have been unrealistic and our contention is that without some game-changing ideas and innovation, all forward targets, will also fail to be achieved. This likelihood will not be influenced by a few minor improvements and a bit more money. Instead, systemic change is required. In our response to the EFRA committee we concentrate on game-changing ideas for how to deliver more trees on farms, where farming as the main land use system continues. We do not argue that this will be sufficient to meet even the most modest targets in full; new woodland creation based on land use change from farming to woodland, will also be required and we suggest that the committee considers evidence from those organisations best placed to advise on this model. However, as the Soil Association, we focus our evidence on the contention that farmers and therefore farming, has a much more pivotal role to play in achieving ambitious tree planting targets, than has been evident so far in the debate and analysis.

As well as considering whether targets are ambitious and realistic, it is also important to consider target coherence across the UK and the specific targets that are set. There have been many references to 'tree targets' in recent years by the government and the development of a specific England Tree strategy, offers the chance to provide some coherence in respect of the following pledges:

- plant 11 million trees in England in the 5-year period 2017-22 (2015 Conservative Party manifesto commitment)
- increase the area of woodland in England to 12% of land by 2060 (25 Year Environment Plan)
- 30,000 hectares of new woodland in England by 2025 (Budget 2020)
- 40m new trees in England by 2025 (Budget 2020)

In addition, there are United Kingdom targets to which England and each of the devolved administrations need to make an appropriate contribution:

- The Climate Change Committee currently estimate 30,000 – 50,000 hectares of new trees are needed each year across the UK to 2050 as part of efforts to reach Net Zero carbon emissions (to be re-assessed as part of the 6th Carbon Budget process)
- Plant 30 million trees each year (2019 Conservative Party manifesto commitment)

As a principle, we believe targets based on numbers of trees should be avoided and, in our view, the England Tree strategy, and equivalents in Wales, Scotland and N. Ireland should set clear targets to achieve at least the following:

- Date bound woodland cover targets for each nation, with specific sub-target for increased farm woodland area – UK woodland cover to reach 19% by 2050 in line with the Climate Change Committee recommendation, with farm woodland area doubling by 2050 as a contribution to this target.
- Date bound agroforestry targets for each nation - 50% of farm enterprises with agroforestry systems in place by 2030 and 5% of total farmed area utilising an agroforestry system by 2040.
- An immediate zero loss Ancient Woodland target

- All current native and ancient woodland ecological condition targets to be confirmed, with a minimum of 75% of these woodlands in either good condition or improving condition for nature, by 2030.

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

Farm woodlands are an important component of UK woodland cover, as can be seen in Table 1. Almost 33% of all UK woodland is part of a farm-enterprise, which equates to over 1 million hectares or 45% of all non-state-owned woodland. Despite this scale, farm woodlands are not often considered in public policy, falling between the cracks of forestry and agriculture institutions, incentives, and regulations.

Table 1

Woodland Ownership	England (000 ha.)	Scotland (000 ha.)	Wales (000 ha.)	Northern Ireland (000 ha.)	%age of Total Woodland area	TOTAL area (000 ha.)
State	214	470	117	62	27%	864
Private (includes farm woodlands)	1093	975	191	50	73%	2309
Farm Woodland (sub-set of private)	368	560	93	16	33% (45% of all private woodland)	1037
TOTAL area	1307	1445	308	113		3173

This lack of policy focus is reflected in two main ways. Firstly, most of the farm woodland is in poor ecological condition and secondly this sizeable farm asset is not viewed positively by many farmers and is typically not considered as part of the productive unit. Over time these two issues have combined to mean that the vast majority of the UK's farm woodland area is moribund or becoming moribund and in some instances is being lost.

The Soil Association's position is that this situation could and should be reversed, as there is an exciting opportunity to build on several notable small-scale UK initiatives to turn farm woodlands into a real asset that work for both farmers and provide public benefits. Furthermore, we support farmers in helping to lead the restoration of woodland cover in the UK, by advocating that the farm woodland area doubles by 2050. As well as farmer led woodland restoration strategy making sense in achieving national tree planting targets given the tenure pattern of UK land, this strategy is likely

to be more culturally and socio-economically acceptable, and also offers the farm enterprise diversification and resilience benefits as well.

Therefore structures, as well as regulatory and implementation mechanisms intended to increase tree cover as part of an existing farm enterprise, should be completely integrated and delivered as part of the wider regulatory activity of the farm enterprise. Over time, this will mean that trees become part of the productive norm of the farm enterprise and feature in farm decision making, rather than based on external decisions, and therefore separate, input.

Another key change required to structures and regulation, is to develop a more ecologically and 'land sharing' aligned framework for trees and woodland creation/management. Woodland ecological processes, especially those required for regeneration and succession should inform the regulatory and incentive framework. Patience and dynamism should be rewarded, as should the integration of grazing herbivores into systems in a managed way, to help drive the ecological processes. Land sharing or 'layering' and mixing up of trees and agriculture, as well as successional habitats such as scrub, should be actively encouraged and supported. Of particular merit, would be to adopt a farmer led 'high nature value farming' approach, to large-scale upland ecological restoration.

Finally, we are supportive of the current presumption for existing woodland, and new native woodland or mixed woodland, to be subject to felling regulations with a presumption for irreversible land use as woodland. However, policy should recognise that this concept of permanent land use change acts as a powerful disincentive to farmer led tree planting, for a whole host of farm economics and psychological reasons. We therefore believe that we need a tiered regulatory approach to this issue and that for successional scrub, as well as new predominantly conifer woodland and agroforestry on farm enterprises, we propose that the permanence requirement is removed and/or clarified as not applying. Instead, whole farm public payments should be linked to a metric for the area of this non-permanent tree cover, at a farm holding level. The rewards should be targeted to maintain, or increase, the level of non-permanent tree cover but the spatial location may be dynamic, enabling farmers to build these systems into their rotation. Through robust and long-term reward for public benefits, the policy ambitions for permanence could then be achieved through an opportunity route, rather than a pure regulatory approach.

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

We have no specific evidence for the Committee on this question.

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

Implementation of ambitions for tree planting have consistently failed to recognise that the starting point is a predominantly farmed landscape in the UK. Tenure led land use change to woodland, whereby farmers cease farming, only makes sense as a commercial timber growing venture, due to high-land prices acting as a barrier to entry. There has been very little focus on encouraging farmers themselves to act as the change implementer, by incorporating new tree planting, as agroforestry and woodland systems, into their farm enterprise activity. Therefore, for too long, aspirations for woodland creation and increasing tree cover in the landscape has been discussed in an abstract and third-party manner, without cognisance of this reality. In many ways the key challenges are no

longer technical or even financial; rather they are cultural and social. We should aim to devise all actions with the ambition of giving farmers, more agency to 'own' the strategy to plant and manage trees, rather than it being imposed on farmers, and delivered by others. This means an effective campaign to ensure that 'tree growing' gives farmers pride and value as 'producers'. In the same way, that the value from growing food and helping to deliver 'food security' gives farmers pride and value currently. So, we advocate for a 'carry on farming but with trees' strategy, to complement the establishment of new, large scale forests by other actors, through a land use change and a cessation in farming model.

To support this transition, we believe that there should be a focus on rewarding farmers for the public benefits that their trees and farm woodlands currently provide, to act as a powerful incentive to deliver more in future. Although almost 30% of England's current woodland cover is part of a farm enterprise (farm woodland), for many farmers this resource is viewed as unproductive and contributing little to farm revenues. Although some of these woodlands will be in poor ecological condition, many will still be providing significant public benefits. If we reward farmers now for what they already deliver, then over time these woodlands will be viewed as 'productive' and contributing to the revenue of the farm enterprise. It is our contention, that this will then encourage increased 'farmer led tree planting and management' and a long-term attitude change to trees on their farms and the benefits of more integrated and diverse land use.

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?

- Mitigating or adapting to climate change;
- Promoting biodiversity and nature recovery;
- Increasing biosecurity and plant health;
- Improving human well-being and health;
- Protecting natural and cultural heritage;
- Food security;
- Creating commercial opportunities from forestry, tourism and recreation; and
- Any other priorities?

Trees, in all guises (individual trees, agroforestry systems, woodlands, forests), have a powerful ability to deliver multiple policy objectives, in a non-exclusive manner. Conversely, history informs us that if a single objective is prioritised, then this elevation can lead to significant trade-offs for other policy objectives. Therefore, delivery of multiple benefits should be the key guiding principle for all publicly funded woodland interventions. The Soil Association does not take a position on specific tree species, not least because our changing climate means that many non-native species may become much more viable and better adapted to new ecological niches than acknowledged native tree species. However, our position is clear that we are in favour of maximising heterogeneity and

avoiding single-species planting at scale. This does not mean that every planting or new woodland needs to be intimately mixed. If planting areas are small scale and multiple across the landscape, then heterogeneity may be achieved at a farm-enterprise or landscape level e.g. catchment level.

Location is the other key principle; new woodland will not be appropriate everywhere e.g. on peaty soils or key open habitats. Conversely, there may be some locations that should be specifically targeted for new woodlands e.g. close to where people live, or to buffer and connect ancient and native woodland areas. Therefore, we believe there is scope for the government to produce a spatial framework to influence location and related regulatory mechanisms such as capital grants and impact assessment, that identifies the areas of England and the other nations of the UK, where new native and mixed woodland, and more trees in the landscape, will deliver public benefits at scale. Within this framework, a 'presumption for change' approach to regulation should be adopted. The goal of the framework should be to identify areas where net benefits will increase through the planting of UK Forestry Standard compliant woodland. For these areas, applications should be positively supported, with quick decisions. This approach would be in line with the Food, Farming and Countryside Commission's call for 'a framework for sustainable land use'.

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?

In many ways, planting trees is straightforward; most of the challenges come with long-term management. We therefore strongly urge the finalised England Tree strategy to fully recognise that a whole system approach is required, to deliver farmer led tree planting at scale and to maximise the benefits from more trees in the farmed landscape. Along with public benefit rewards, there will need to be intervention and support to encourage a 'farm woodland and agroforestry economy', This economy is not just about landowners and land managers, foresters, and farmers. It's also about marketeers and supply chain actors, who need to be supported to help grow the farm woodland and agroforestry economy in England. This means public support for upstream service provision and market/supply chain development, that is led by non-landowning actors.

We also advocate for a significant support for woodland management that helps to deliver abundant nature in our woodlands. Less than 10 per cent of our native woods are in good condition for nature. Creating new woodland will count for little, if we allow the woodland we already have, to degrade further. To address this, and meet our suggested subsidiary target of a minimum of 75% of woodlands in either good condition or improving for nature by 2030, land managers should be incentivised to effectively manage, monitor and enhance the trees and woodlands under their responsibility, drawing on expert guidance on what constitutes sustainable woodland management.

Incentives to increase management of woodlands should be holistic and recognise the wide range of ecosystem services provided by different woodlands and woodland habitats (including closed-canopy woods, wood pasture, open areas within woodland, trees within open landscapes, urban trees and successional woodland, including thorny scrub). Increased uptake within England of certification to the Forest Stewardship Council (FSC) and the Programme for the Endorsement of Forest Certification (PEFC) schemes (accredited through the UK Woodland Assurance Standard - UKWAS), would help to improve management - uptake of UKWAS in England has fallen over the last decade to 25% of woodland area (the UK average is 44%).

Ends