

## Written evidence submitted by The Royal Forestry Society to the EFRA committee Tree Planting and Woodlands inquiry

The Royal Forestry Society (RFS) is the largest education charity dedicated to promoting the wise management of trees and woods across England, Wales and Northern Ireland. Across this area, RFS members are collectively responsible for the stewardship of the vast majority of managed woodland.

### 1. Key points

1. Government woodland creation targets are achievable but there is a large gap between ambition and action in England and Wales which must be addressed. This will not happen quickly so targets must be calibrated accordingly.
2. Government ambition in England must be matched with the scale of funding required to drive a step change in the rate of woodland creation and management.
3. Institutional and bureaucratic barriers to woodland creation must be removed.
4. The UK Forestry Standard (UKFS) should be the common basis on which forestry policy and practice is developed and delivered. We are currently falling short of this standard.
5. Climate change mitigation and adaptation should be at the heart of government forestry policy. This is the most effective way to draw together the multiple environmental and economic benefits of trees and woods including increased carbon capture, biodiversity, health and well-being, flood attenuation and domestic wood product production.
6. A big effort to build knowledge and skills through education and training at all levels, is a pre-requisite for success. This effort is currently chronically underfunded.
7. A stronger focus on improving the condition of existing broadleaf woodland is vital for their resilience to pests, disease and climate change. This requires funding which is currently inadequate and does not recognise the public benefits these woods generate.
8. Evidence suggests that cooperation between devolved administrations is not a major cause for concern but a GB-wide framework for biosecurity policy which respects country specifics is required as a matter of priority post Brexit.

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

The UK target of 30,000 hectares (ha) a year of woodland creation to 2050 to increase forest cover from 13% to 17% is ambitious but achievable. It is in line with the Committee on Climate Change (CCC) 2019 recommendation as an integral part of a range of measures to achieve net zero by 2050. It is not the CCC stretch target of 50,000 ha a year which would lack credibility given the low starting point. 30,000 ha requires a 5% switch in land use from agriculture to forestry over 30 years, which is neither significant nor a threat to food production or protected landscapes. Higher rates of afforestation were achieved in the mid-20<sup>th</sup> century. However, there is a wide gap between ambition and action with no coherent plan agreed between the devolved administrations on how this UK-wide target will be parcelled out and delivered.

The majority of the UK target will be met by Scotland where there is a plentiful supply of relatively inexpensive land suitable for afforestation, policies and delivery mechanisms aligned with this objective and strong political leadership and support for forestry as an important component of the Scottish economy. Scotland is already performing well on afforestation.

England and Wales lag far behind. There is currently no woodland creation target for England. The English Tree Strategy consultation technical notes state that the Forestry

Commission “*estimate that planting 10,000 hectares per year by 2025 is the highest possible planting rate for conventional forestry.... However, further work is required to understand what can be achieved in England.*”

Any target that emerges from the English Tree Strategy must be founded on the evidence of this “further work”. It is better in the long-run if any teething problems are sorted out carefully rather than being rushed because there is a perceived need to get lots of trees in the ground quickly. In this context, annual targets that build from the current very low base of 1,950 ha a year (average 2013-20) towards an ambitious but achievable run rate by 2030 in the region of 6,000-10,000 ha a year is the best approach to build confidence.

Targets should be expressed in hectares of woodland established, not number of trees planted. This recognises that planting is the start of a long-term commitment to responsible management and that direct seeding and natural regeneration has a role to play.

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

The RFS published [Woodland creation opportunities and barriers](#), a survey of its members attitudes and experiences of woodland creation in January 2020. This shows that in England and Wales there is currently an inadequate level of funding to drive a step change in the rate of woodland creation, an overly bureaucratic regulatory process, and shortage of knowledge and skills at all levels. These barriers must be addressed to speed up the required rate of afforestation. The RFS recommends the following measures:

#### **Funding:**

- Compensate land managers for loss of agricultural income. The phase-out of the Basic Payment System (BPS) will change the relative value of agriculture and other land uses, but this will not happen for some years and does not bridge the perceived or actual risk of a permanent land use change. Prior to the introduction of the Countryside Stewardship Scheme (CSS) woodland creation grants included an explicit income foregone element. This needs to be reintroduced. The permanence of land use change to woodland should be revisited.
- Simplify access to carbon markets and reduce risk to drive up participation in a mechanism which could play a much greater role in funding woodland creation in future.
- Remove uncertainty about the long-term commitment to support management of newly created woodland. The current 10-year £200/ha maintenance grant in England recognises early year establishment costs but woodlands continue to be a cost burden for 20 years or more before income comes on stream.

#### **Regulation**

- The bureaucratic shortcomings of the CSS Woodland Creation grant scheme are well documented and the call for a simpler, lower risk process made by the forestry sector many times. In particular RFS members request:
  - Faster approvals process and greater certainty that UKFS-compliant proposals are approved.
  - Greater flexibility in application and claim windows to reflect practical constraints on forestry operations
  - Automatic enrolment in the 10-year woodland maintenance grant with no funding gap following planting
  - Less risk of penalties for unavoidable variance from plan to establishment which recognises realities on the ground.

- The Forestry Commission's (FC) remit to uphold the principles of sustainable forestry through the UK Forestry Standard (UKFS) which balances economic, environmental and social considerations make it the appropriate Defra agency to have single point accountability for forestry matters in England. Land managers should not be expected to interface with multiple Defra agencies. The FC should be properly resourced to deliver its responsibilities.
- There should be a presumption in favour of approval of UKFS compliant woodland creation plans. This would not replace the need for stakeholder consultation but would make the criteria for approval much clearer. The permitted development planning process provides a model.

### **Knowledge and skills**

Achieving the objective to expand woodland cover starts with well-informed, knowledgeable and engaged land managers. There is a large segment of land managers with little or no knowledge and understanding of woodland management. An effective sector-led outreach programme to build their knowledge and confidence is a pre-requisite for success. This will minimise the risks that some will be enticed by the short-term prospect of grants to plant trees which later fail through lack of evidence-led planning, neglect and mis-management.

The RFS report [A forestry skills study for England and Wales](#) (2017) identified critical skills shortages across the board, but particularly for operational skills in England and Wales. This skills deficit is set to get worse as activity ramps up, unless it is addressed.

The Forestry Skills Forum (FSF), supported by the RFS, has identified the areas where intervention is required to address skills shortages This includes actions to:

- Embed forestry into elements of the national curriculum at Key Stage 3 and 4.
- Raise the profile of forestry as an attractive career option among school leavers through an effective sector-led outreach programme.
- Improve the provision of forestry at Further Education level by incorporating more forestry-specific elements into combined forestry and arboriculture courses
- Make forestry apprenticeships more attractive to employers to increase job opportunities. This means funding training and equipment for small forestry businesses.
- Increase the provision of forestry-related CPD for early and mid-career professionals

There are many excellent initiatives under way by members of the FSF which start to address these needs, but taken together, they are insufficient to address the scale of the task. This is principally due to a wholly inadequate level of funding.

An adequate supply of skilled foresters will be achieved when there is commitment to properly fund schools outreach, reverse the long-run under-funding of Further Education provision and support skills training in small businesses. There are no short cuts or quick fixes to this issue. It is a government-wide challenge and not one that sits with Defra alone.

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

The evidence suggests that cooperation between the devolved administrations on key forestry policy issues of common interest is not a cause for concern. The three key areas where a common approach is of greatest benefit are:

- **Biosecurity:** Management of the UK's external borders is a reserved matter and should remain so. Plant health and biosecurity is a devolved responsibility. This arrangement

has been underpinned by the overarching EU framework. It is widely acknowledged that development of a GB-wide common biosecurity framework is now essential in order for the various elements of a biosecurity strategy to function effectively post Brexit. This framework needs to respect country specifics. The Plant Healthy Certification Scheme needs to be adopted by all nurseries and plant suppliers.

- **Forest Research** must remain a UK-wide undertaking. It leads world-class research on, among other topics, climate change, pests, disease, tree breeding, silvicultural and social science which are relevant to all countries and inform improvements in forestry practice. Its ability to attract research funding and high calibre researchers should not be put at risk.
- **The UK Forestry Standard (UKFS)** is the closest we have to a UK forestry policy. It covers the requirements, regulations and good practice for sustainable multi-purpose forestry. If all land managers were obliged to develop and implement UKFS-compliant management plans, it would provide the best assurance that woodland creation is being delivered responsibly across the UK. Unfortunately, the British Woodland Survey 2020 (BWS20) indicates that almost 70% of respondents to this survey do not have a UKFS-compliant management plan. Closing this gap is important to ensure woodland creation is a widely embraced, long-term, sustainable endeavour in which we can all have confidence.

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

The reasons that previous ambitions were not met are:

- Woodland creation was not a political priority until the climate emergency made it one. There is now widespread popular support and political will. However, unless all government agencies with decision making or influencing powers on the woodland creation process have a presumption in favour of positive action, progress will continue to be slow.
- There was inadequate funding. The development of carbon markets and better understanding of natural capital creates a stronger case for action. Business is interested and capable of contributing significant funding. The government seems willing to address the funding gap but so far the response has been piecemeal and underwhelming. Most land managers need a financial case to switch land use.
- The introduction of the Countryside Stewardship Scheme (CSS) increased complexity and creating a hiatus which disengaged many potential participants. The current gap between CSS and the introduction of ELMS in 2024 (earliest) creates another hiatus. Land managers need confidence in the consistency of policy to make a long term commitment to land use change.
- Government support for woodland creation has had a strong bias in favour of native broadleaf species. For land managers aiming to grow productive species this restricts choice and acts as a disincentive to engage. The risks of damage to many native and near native broadleaf species from pests, disease and climate change are often seen as too high and returns too distant. Government policy should ensure species choice is site-suitable and evidence-based, but avoid species bias.

**5. In relation to increasing tree planting in England, what should the Government be trying to achieve? For example, how should the following policy objectives be prioritised?**

Rapid and ambitious change in land use is not achieved with multiple priorities designed to please everybody. This is in part why forestry policy in England has fallen short of expectations. A prerequisite for success is to focus on a clear and compelling objective. The RFS believes that climate change mitigation and adaptation should be at the heart of forestry policy, and the golden thread that links all other objectives, as set out in its report [Forestry and Climate Change](#). This is because:

- Climate change is an existential threat not only to the health of our trees and woods but to the economy and society's health and wellbeing.
- Climate change mitigation and net zero are the principle drivers of the ambition to create more woodland cover, a clear, compelling and easily understood objective with popular support which will drive the right behaviours.
- Adaptation to climate change, pests and disease is the best guarantee that new woods are ecologically and financially resilient in the long term, and there is a positive legacy beyond 2050.
- UKFS-compliant, resilient woods enable delivery of the other multiple benefits of woods on a sustainable basis, including biodiversity and nature recovery, human health and well-being, flood attenuation and wood product import substitution.
- Alignment of forestry policy, delivery mechanisms and practice on achievement of resilient woods empowers land managers to act. There is no single prescriptive approach. Resilience can be achieved equally effectively in all woodland types. It encourages a diversity of approaches best suited to local conditions and land managers' objectives and will enable creation of a portfolio of commercial forests which are most effective for carbon sequestration, small semi-natural woods, copses, shelterbelts and trees outside woods.
- Climate adaptation encourages land managers to be led by the evidence of silvicultural science. This means selecting tree species and provenances that evidence suggests are suitable for the current and projected site conditions, establishing robust species mixtures and adopting low-impact silvicultural methods where possible. It would discourage ill-informed woodland creation plans which later fail. BWS20 indicates that it is land managers with commercial objectives who are being most proactive with adaptation practices.
- If we do not put climate adaptation at the core of forestry policy and ignore the evidence, the climate and disease related stress that some species are already showing in parts of South-East England will spread wider and faster.

**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?**

**Management**

Almost 60% of broadleaf woods in England are neglected or undermanaged, This is an area of almost 580k ha, considerably more than the highest projections of woodland creation in England over the next 30 years. We must increase focus on management of this resource.

Much of this is woodland less than 20 ha where land managers do not have the knowledge or confidence to bring their woods into management and where lack of scale make returns from sale of wood products relatively unattractive.

Undermanaged woods are not only a wasted economic opportunity to increase domestic wood production and create jobs (valued by the RFS at £20m a year or 250 jobs foregone), it is a substantial threat to the health of these woods which are at greater risk of degradation from pests, disease and climate-related stress. All the evidence points to managed woods being a pre-requisite for increasing biodiversity.

The RFS published [\*Bringing woodlands back into management: the missed opportunities England and Wales\*](#) in 2019 which recommends the following measures to address the problem:

- **Eligibility for financial incentives:** Stewardship of sustainably managed woods which generate multiple non-market public benefits should be eligible for grant support on an equal basis to equivalent interventions on agricultural land. The narrow eligibility criteria which prioritises access to the CSS Woodland Improvement grant is a major disincentive to participation. As a result, most woodland, however well managed for biodiversity or climate change adaptation is currently effectively excluded from grant support.
- **Stimulate the hardwood supply chain:** The RFS supports measures which stimulate the market for home grown hardwood, especially timber for construction which substitutes for steel and concrete. This requires investment in all parts of the supply chain, including forest roads (currently only 40% of costs supported), processing capacity, and initiatives which support the bioeconomy.
- **Education and training:** A significant outreach effort is required to engage land managers in better understanding the financial and ecological benefits of woodland management and how to access the knowledge and expertise to help them to get started.
- **Support for co-operatives:** There should be greater encouragement for small woodland owners to work together. This means making it simpler for multiple owners to submit joint felling licence and grant applications and to aggregate supply. Landowners and agents need to be incentivised to make the additional effort to bring multiple woodland owners together.

The RFS expects all these measures to be incorporated into the Environmental Land Management Scheme (ELMS) and its equivalents in the devolved administrations.

It should be the responsibility of all land managers receiving government grants to control grey squirrels to mitigate damage caused by bark stripping. Government should continue to support grey squirrel fertility control research, introduce better incentives for land managers to control grey squirrels and plant more tree species which are less vulnerable to grey squirrel damage. Without these measures, many land managers will not plant broadleaf trees and much public grant funding will be wasted on planting trees that do not survive to maturity.

Royal Forestry Society

November 2020