Forestry and Woodland Management in Scotland
Letter from the Royal Society of Edinburgh, 20 February 2025

Dear Committee,

Forestry and Woodland Management in Scotland. Session on 15th January 2025. Further advice from the Royal Society of Edinburgh

Thank you for the opportunity to present evidence to your Committee regarding opportunities and concerns in relation to the Evidence Hearing above. I undertook to provide you and members with some further information and lines of evidence. Our proposals are dealt with first, followed by more detail.

Proposals

Mandatory EIA's for tree planting proposals over 50 hectares

A 50-hectare cut off point will, based on Scottish Forestry figures, embrace about 70% of all land planted with trees, but only 30% of applications. Enormous areas of Scotland are having their environment dramatically and permanently changed without proper, public process. This will bring the major planting applications in line with planning applications.

Scottish Land Commission (SLC) Protocol on Community Consultation to be mandatory for tree planting applications

A recurring concern across several submissions to the RSE (e.g. RSPB, BSBI, Prof David Raey/ECCI, Friends of the Ochils, James Hutton Institute, Scottish Land Commission, Sustainable West Linton and District) was the absence or poor nature of community consultation. This is reinforced by the separate 2022 reports of the Forestry Policy Group and The James Hutton Institute. Understanding the impact of scale and concentration of landownership: Community perspectives from the South of Scotland.

The SLC's Protocol was drawn up after widespread consultation and advises mandatory application of this protocol would resolve a major complaint of Community Councils and many voluntary groups. This would put them in a similar position to that of urban communities faced with proposed planning applications.

Empower Scottish Forestry (SF) to award grants to Local Authorities to plant individual trees and avenues in existing bult environments and enter into agreements to establish and fund appropriate management of such urban trees.

The benefits of trees to urban temperatures, and to the health and well-being of people living in urban areas, are clear, and described in our Report. There would also be biodiversity benefits. When asked to implement this recommendation, SF

claimed that they do not have the statutory powers to do so. The proposal is in fact no different the provision of grants by SF to private landowners under the Scottish Forestry Grant Scheme. The environmental and social value of such trees are considerable, not least in connecting people with nature, and offering a much more rewarding ambience. An addition to the Natural Environment Bill granting SF the appropriate powers would not only clarify matters but send a message that Parliament considers this important.

Remove Spruce from the list of exempted invasive species

There is currently an exemption from the for Wildlife and Natural Environment (Scotland) Act 2011 for Spruce on the false presumption that the control of invasive Spruce is dealt with under the United Kingdom Forest Standard (UKFS). The UKFS does not provide any requirement for landowners to take action, either for reducing Spruce rain or for removing Spruce invading other land. This is contrary to Parliament's approach that 'the polluter pays'. It results in widespread damage to other environments, increased carbon release and the expenditure of large amounts of public money to remove the non-native invasive species (detailed figures below.)

Other concerns and further information

Mr Goodall, representing Confor, expressed the view that it was "fundamentally wrong" to rely on natural regeneration. This is an extraordinary statement, given the importance of the natural regeneration of our native woodlands and to the increasing of our tree cover. Natural regeneration is currently inhibited by the unnatural level of herbivore browsing we have in Scotland, particularly high deer densities, and by some land management practices. This is why Government is devoting so much resource to reducing grazing and browsing pressures, and the impacts of non-native invasives, to encourage natural woodland regeneration. Government is also introducing new instruments to put good land management in place that promotes biodiversity, is good for carbon capture and storage, and benefits local communities.

The Hutton online resource 'Mapping Net Change in Carbon from Afforestation in Scotland' is a key resource to help map net changes in carbon from a range of afforestation practices. It is evidently not being used effectively.

On EIAs we have detailed wording for the appropriate clause in the Act if you would find that helpful.

The impacts of non-native conifer 'seed rain', especially Sitka spruce (already 47% of all trees in Scotland are Sitka) on open upland landscapes, especially peatlands, are alarming. Peatlands are Scotland's most valuable resource when it comes to carbon capture, and are also of very high biodiversity value. Yet they continue to be damaged and exploited. The RSE Report quotes findings from NatureScot, which estimates the following:

Area of peatland at risk of Sitka invasion:

High risk = 267,000 Ha (within 200m of forest plantation edge,

Some risk = 579,000 Ha (between 200m – 1km of forest plantation edge)

This gives a total peatland area currently within 1km of forest plantations = 846,000 Ha. The extent of peatland in Scotland is almost 2 million hectares, so this figure at risk of Seed rain is immense. The current grant for removing such reseeded trees on peatland (funded under the Government's Peatland ACTION) programme is around £1600 per hectare. In effect, that means around £1 billion may be required to remove invasive trees to ensure good condition peatlands sequester carbon. This sum dwarfs the Government's allocation to restore peatlands (£0.25 billion over ten years). Scottish Forestry indicated at the meeting that this is being looked at, but fundamental change is needed to deal with current and further impacts of such seed rain, and to avoid its wider scale occurrence; most importantly also to return the responsibility of controlling and managing invasive Sitka to the landowners who are responsible for other habitats being invaded by a non-native invasive conifer.

Regarding the depth of peat over which afforestation is permitted, there is a fundamental difference between England (no planting on peat deeper than 30 cm, with some exceptions) and Scotland (no planting on peat deeper than 50 cm). These are important policy differences, and there is no evidence to support the more damaging threshold in Scotland, which results in far greater extents of Scotland's than England peatland being afforested. Note that even 30cm of peat depth contains, hectare for hectare, as much carbon as a tropical rainforest.

We heard concerning evidence (from Dr Mitchell), and have noted ourselves, that the advice on tree planting and carbon emissions on peatland, and more widely, is flawed, and at best contested.

Curlew (a wading bird that is red listed in the UK and declining globally; it has declined continuously in the UK since 1995, with the most marked declines being in Scotland and Wales) was referenced at the end of the Hearing. A UK Action Plan will shortly be published under the auspices of the Curlew LIFE project. There are very considerable concerns about the Forest Shadow effect on Curlew and other upland-breeding waders (which tend to avoid the forest edge because of high predation risk). Much of the dramatic decline of curlews in Scotland is due to the loss of open moorland, for example, about one third of Dumfries and Galloway is forest, the great majority being commercial plantations. The late Dr Derek Ratcliffe in Galloway and the Borders (New Naturalist, 2007) estimated at that time a loss of 5,000 pairs had occurred due to loss of habitable area to commercial forestry. The situation has continued to deteriorate. In England, guidance is being drawn up to advise on woodland creation with regard to wader conservation; we need such guidance in Scotland. Curlew Action provides very good guidance on conservation and management measures for Curlew and thereby a basis on which to act.

Finally, Paul Brannan's book 'Timber' (Agenda Publishing, 2024) was strongly recommended by David Robertson, Scottish Woodlands. It treats Sitka in isolation from the environment and people. It is worth noting that the author is a full-time lobbyist, as Director of Public Affairs for the European Confederation of the Woodworking Industries.

Overall we wish to emphasise the importance of passing or amending legislation to

meet Parliament's objectives of tackling carbon emission reductions and biodiversity gains to the benefit of communities, rather than to have simple, numerical targets to plant trees. Often, and over extensive areas of Scotland, tree-planting is being done in the wrong place, with the wrong trees, and using damaging practices that are to the detriment of rural communities and the well-being of all Scotland. This results in carbon loss and damaging consequences for biodiversity. Much of this flawed policy is funded by public expenditure, which is very concerning.

We would be happy to provide further material, or amplify the above, if that would be helpful.

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