

20 January 2025

Dear Convener

**Re: Supplementary evidence to RAI Committee Forestry and Woodland Management in Scotland roundtable**

Thank you for the opportunity to present evidence at the Forestry and Woodland Management Roundtable on Wednesday 15 January 2024. We are writing to follow up with supplementary information that we did not get round to presenting verbally due to time constraints.

Woodland Trust Scotland's charitable objectives are to protect, restore and expand our ancient woodlands, and support the creation of new native broadleaved woodland in Scotland. We also recognise the importance of the commercial forestry sector to Scotland's economy and support home grown timber. We believe that forestry and woodlands can be a spectrum of diverse, multi-purpose sites, but for the purposes of this letter, will simply be referring to 'commercial' forestry and native broadleaf woodlands (including Ancient Woodland).

Ancient Woodlands are some of our most diverse and rich habitats and protecting and restoring them is vital to halting nature loss in Scotland. Unlike newly planted native woodlands or primarily fast-growing commercial forests, these ancient ecosystems have accumulated indispensable ecological value over hundreds and thousands of years, and are impossible to replicate, which is why they are irreplaceable. Below we have set out some key issues and actions that we believe need to be undertaken to protect these valuable habitats.

**Deer**

Deer grazing is the number one pressure on native trees and woods in Scotland – over the last 40 years, 12.5% of our Ancient Woodland has been lost and converted to open ground due to over browsing.

We welcome the recent introduction of the Deer Management Incentive Schemes (DMIS) and the ongoing implementation of the Deer Working Group recommendations. However, as an internationally important habitat, [Scotland's Rainforest should be considered as a priority habitat for the rollout of DMIS.](#)

In the five years from 2018, over £24.6m had been spent on deer fencing. This is a considerable amount of money that could deliver wider public benefit if spent on wider nature restoration or indeed many other schemes. It is important that all stakeholders in the forestry and woodlands sector, including Government agencies, consider how we can shift from relying on fencing and planting to the same extent, to more natural regeneration of native and mixed woodlands. We believe this is the most effective way to naturally restore ecosystems.

[To this end, NatureScot, Scottish Government and Scottish Forestry should collaborate on the design of financial support mechanisms to incentivise landscape scale deer reduction to levels that allow the natural regeneration of trees across multiple land ownerships.](#)

### **Plantations on Ancient Woodland Sites (PAWS)**

There is approximately 148,000ha of Ancient Woodland in Scotland, with 59,000ha of this (39%) a designated Plantation on Ancient Woodland Site (PAWS). In the post-war rush for timber security, large areas of Ancient Woodland were clear felled and planted with fast-growing commercial species that focused on timber production. This figure is likely to be an underestimate due to the unreliability of the Ancient Woodland Inventory (AWI) maps.

Many PAWS sites contain remnants of Ancient Semi-Natural Woodlands (ASNW) that continue to support these historic ecological features, some hidden in the soils, some will full trees still standing. [The UK's Tree of the Year](#), the magnificent Skipinnish Oak, surrounded by dark conifer plantations is one such example.

These ancient remnants should be restored to allow wider ecosystem recovery, but time is running out as timber crops mature, blocking sunlight and disturbing delicate soil ecosystems. PAWS restoration efforts across public and private land must be accelerated and carried out sensitively if we stand any chance of saving these historic ecosystems.

Therefore, the [Scottish Government must provide a political commitment to restoring PAWS on private land](#), and Scottish Forestry should place greater emphasis on encouraging PAWS restoration. Our Nature Recovery Report recommends that SF and FLS should develop strategies and action plans to restore 50% of PAWS on private and public land specifically, supported financially by Scottish Government,

[The Welsh Government has enacted some policy changes](#) to make progress on PAWS restoration on private land, in a way that attempts to balance future timber production. We look forward to speaking with colleagues in the agencies to explore similar options.

## Control of Invasive Non-Native Species (INNS)

The devastating effects of the spread of *Rhododendron ponticum* on biodiversity, particularly in Scotland's Rainforest, are becoming more widely understood.

We would like to see a **strategy for controlling *Rhododendron ponticum* in Scotland's Rainforest and controlling regeneration of shade-casting non-native trees in ancient woodlands**, such as the seeding of Sitka spruce onto sensitive neighbouring habitats.

**The Scottish Government should deliver on its commitment to create a Rainforest Restoration Fund that would fund the costs of removal.**

## Nature Restoration Fund (NRF)

Cutting the NRF to plug gaps elsewhere in public expenditure speaks to a marked deprioritisation of nature recovery, despite continued commitments to halting nature loss by 2030.

The NRF is key for Local Authorities to undertake nature restoration at a time when their own capital and revenue budgets are extremely tight. We are disappointed to see that no clarity has been offered on the reinstatement of the NRF and call on the Scottish Government to not only reinstate to previous levels, but to uplift in line with its commitments to halting nature loss by 2030.

## Forestry Grant Scheme (FGS)

Woodland Trust Scotland will of course engage with all consultation and discussion opportunities with SF and relevant partners in development of a new iteration of the FGS. In the meantime, our Nature Recovery Report has set out a number of recommendations regarding changes to the FGS that would foster nature recovery in Scotland and make our native and commercial forests more resilient to climate change and other pressures. These recommendations include:

- An increase in the proportion of new native woodlands delivered through FGS – prioritised in areas that expand existing fragments of Ancient Woodland
- A dedicated PAWS restoration grant that exceeds the grant levels for new native woodland creation and revision of operational delivery around PAWS restoration
- 10% of the annual FGS budget should be set aside to support the management of existing woodlands
- Design of a new financial support mechanism to reduce deer numbers at landscape scale
- Creation of a new mountain woodlands creation grant to incentivise restoration of a natural tree line to the uplands, vital for natural flood management and water quality

- More coordinated support for small nurseries to enhance the availability of UK and Ireland Sourced and Grown (UKISG) trees, and northern and western provenance trees, which would contribute to biosecurity and resilience of our trees and woods
- Introduce a requirement for grant funding to wholly or fully support schemes that use UKISG plants

The above points are supplementary to the information provided at the roundtable. We look forward to continuing to work with stakeholders right across the sector to protect, restore and expand our existing native woodlands, and create new woods and forests for people and nature.

Yours sincerely,

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