

Mike Hedges AM, Chair
Climate Change, Environment and Rural Affairs Committee
National Assembly for Wales
Cardiff Bay
Cardiff
CF99 1NA

8th September 2017

Dear Mr Hedges

Coed Cadw – The Woodland Trust response to the Welsh Assembly Climate Change, Environment and Rural Affairs Committee (CCERA) report “Branching Out: a new ambition for woodland policies” (July 2017)

We greatly welcome the Committee’s report and are largely supportive of the Committee’s recommendations in particular those relating to:

- long term targets for increasing tree cover (recommendations 1-3) ;
- ensuring a minimum of 20% urban tree cover (4);
- using woodland for community regeneration (5);
- improvements to public access provision including incentivising land owners to enable recreational access to their land (6)
- the strong endorsement of the UK Woodland Assurance Standard (10)
- basing future funding for land and forest managers on delivery of sustainable outcomes.(13)

If we have a reservation it is on the potential for the report to be used to argue in favour the expansion of commercial soft wood afforestation at the expense of other policy outcomes highlighted as desirable. This risks encouraging a long embedded inclination in production forestry to discount the environmentally damaging impacts of commercial forestry on water quality, soil conservation and biodiversity, and thereby undermine regulatory oversight.

In relation to recommendations 1 to 3 on woodland expansion and recommendations 8 and 9 on supporting the commercial forestry sector we are generally supportive of the intentions.

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We do not support the view strongly advocated by some in the commercial forestry sector that softwood production volumes must be guaranteed irrespective of sustainability or consequences for other policy objectives and stakeholders. Nor do we support the backward looking focus on preventing landscape change or unwillingness to recognise the sustainability and environmental case for the production of more sustainably produced timber.

What we think needs to change

- There is a need to create real cash income streams for forest owners who deliver non-timber benefits, otherwise the imperative to produce softwood at the expense of other outputs will continue.
- There is a need in the environmental sector to accept that change is justified and beneficial in some landscapes in Wales, including the planting of commercial woodland, and that this will have impacts on some species. Preservation of landscapes of pre-mechanisation farming on an extensive scale is not sustainable or desirable.
- There is a need in the commercial forestry sector to accept that commercial woodland has to be much more diverse and that this will challenge current forestry business models which are dependent on high volume single species production.
- The Welsh Government and the forest industry needs to unequivocally back the independent audits of sustainability that are available through the UK Woodland Assurance Scheme (UKWAS), and applied to the Welsh Government and Woodland Trust estates, and which provides forestry with a sustainability certification that no other land use sector can match. The UK Forest Standard (UKFS) as promoted by Government is not auditable and is no substitute for the independently audited UKWAS sustainability standard.
- Commercial forestry and agriculture cannot expect to continue to externalise their costs and impacts onto other stakeholders, for example in terms of air and water pollution and loss of biodiversity.
- Forestry and agriculture needs to work closer together to realise the benefits and synergies of integration. Agro-forestry is one option which the Welsh Government needs to explore in more detail, particularly in developing a sustainable land use management policy post CAP.

A Way Forward

Coed Cadw – the Woodland Trust strongly believes that any future forestry policy should be part of a sustainable land management policy that covers all rural land in Wales. We believe that there remain misconceptions about the benefits of multi-purpose forestry expansion and that in order to tackle this there is a need for these benefits to be demonstrated on the ground by establishing one or several large new “forests” in Wales. These will be extensive areas of partially forested landscape which demonstrate much more diverse and better designed approaches to commercial afforestation within a landscape matrix that includes secured and managed habitat and some continued farming. These target areas will need to be in locations where there are substantial areas of lower grade farmland free of constrictive designations. The Government will need to provide a compelling incentive scheme that persuades investors and a majority of landowners to participate and provides support for a range of landscape management interventions and not just for new forest planting. An integrated multi-purpose whole forest plan will be required, prepared and delivered under strong leadership.

The Trust is participating in a bid led by CONFOR under the WG co-operative forest planning scheme which we hope may take a step towards identifying such locations, but further work may be required.

We do not believe that a negotiated compromise between competing stakeholders is going to be possible without strong leadership from the Welsh Government; particularly given they are the predominant forest owner in Wales. We do not believe that NRW can provide this leadership as they do not set the objectives for the public forest estate and are compromised by combining forest management and regulatory functions. Coed Cadw welcomes the committee’s report into the future of forestry in Wales as an important contribution to the discussion on how we deliver a fully sustainable and integrated future for our precious environment.

Yours sincerely



Jerry Langford
Director Wales

C.C. Lesley Griffiths, Cabinet Secretary for Environment and Rural Affairs