

Royal Forestry Society (RFS)

English Tree Strategy (ETS) Consultation

This open response to the ETS reflects consultation with RFS members. It should be read alongside the RFS online survey response and the RFS joint submission to the [Environmental Land Management Scheme \(ELMS\) consultation](#). The RFS is committed to continue to work with Defra to ensure the success of the ETS and follow-up to the recommendations made in this submission.

Summary

1. The policies and delivery mechanisms of the past eight years have not served forestry well and now is the time to **set out a new direction**. The government aim to achieve a transformation in the role of trees and woods in the environment, economy and society is welcome but will only be delivered with a targeted and ambitious plan with fully aligned delivery mechanisms and which is properly funded.
2. **Climate change mitigation and adaptation of woods to be resilient to pests, disease and climate change** should be at the centre of the ETS aims and objectives and underpin all the measures and actions proposed relating to expanding, protecting and improving trees and woodlands. Rapid environmental change represents the greatest threat the economy, human well-being and woodland health. All barriers to accelerating the pace of mitigation and adaptation must be removed.
3. The RFS supports the government's target to plant 30,000 ha of trees a year in the UK, but this will only be reached if **financial incentives are improved and bureaucracy reduced**. We recommend a presumption in favour of woodland creation for UK Forestry Standard (UKFS) compliant plans.
4. The English Tree Strategy (ETS) and its delivery mechanisms must be **inclusive of all forms of woodland management** where they comply with the UKFS. Productive forestry generates significant economic, biodiversity and carbon capture value and must be supported alongside other approaches. It is in all stakeholders' interests that woodlands are both a financial asset to their owners, as well as generating non-market benefits.
5. The RFS supports the objective to **bring more woodlands into management**. Land managers need an incentive to make a long-term commitment to sustainable woodland management. Paying land managers for delivery of public goods has the potential to drive change in levels of activity. However, financial incentives alone are not sufficient. The challenge is to raise understanding in the farming community of how to access the financial benefits of woodland management. This requires large-scale outreach.
6. **Grey squirrel and deer populations must be drastically reduced** if objectives to increase woodland biodiversity and stimulate the hardwood supply chain are to be achieved. All land managers must take responsibility for pest control. This requires effective incentivisation, collaboration and research.
7. The RFS supports a strategy which is **inclusive of trees outside woodlands** in all their various forms including agroforestry, urban and peri-urban trees and woodlands. This is key to breaking down the artificial barriers between woodland and agriculture.
8. Forestry is a science dependent on well-targeted and insightful **research and innovation** which informs practices that lead to more resilient and productive woodland. The vital role of research must be a more central component of the ETS.
9. The ETS must be underpinned with a **robust and well-funded plan to attract more people to enrol in forestry-related courses** to acquire the skills and qualifications required to meet anticipated demand.

1. The starting point

The government's Forestry and Woodlands Policy Statement published in 2013 in response to the 2012 Independent Panel Report was welcomed by the forestry community. Disappointingly it has since failed to deliver many of its key objectives. A woodland creation target of 5,000 ha/year has actually delivered an average of 1,950 ha/year (2013-20). A target to increase the proportion of woods in management to 67% by 2018 has actually delivered 59%. Woodland biodiversity and the overall health of our woods and trees is also reported by the NFI to be declining and is set to deteriorate further due to the increased prevalence of pests and disease and climate-related stress. In all cases the targets were achievable, but the delivery mechanisms and funding have been inadequate to the task.

There is a broad consensus that trees and woods can play a vital role in climate change mitigation, nature recovery and health and well-being. This ETS is a timely opportunity to harness this enthusiasm to create a transformative vision and to fund its delivery properly. The RFS is concerned that the ETS consultation appears to risk more of the same.

The ETS must be consistent with the Environmental Land Management Scheme (ELMS) which will be the principle delivery mechanism for the ETS in the long term.

The UK Forestry Standard (UKFS) must remain the source of regulatory and best practice guidance for all forms of forestry. There are significant advantages from continuing to promote the benefits of this independent and unbiased standard to promote sustainable forestry.

Climate change should be placed at the heart of the ETS as recommended in [Forestry and Climate Change](#) published by the RFS in January 2020. Climate change is an existential threat to the economy, nature and human health. Creating more UKFS-compliant productive woodland and adapting existing woodland to the threats of climate-related stress, pests and disease is the most effective way to deliver the combination of economic, environmental and societal benefits. Delivery mechanisms and funding should align with this objective to drive rapid change to the scale and resilience, both financial and ecological, of our woodlands. Biodiversity, carbon capture, flood alleviation and health and well-being objectives that woodlands are rightly expected to deliver will be achieved, and more effectively, with this clear, focused strategic goal.

2. Expanding and connecting

The RFS supports the government's target to establish 30,000 ha a year of new woodlands in the UK and believes this is challenging but achievable. The ETS should set a target for England based on data showing the areas of land most suitable for establishing woodland which can be cascaded to regional authorities. Any target must be underpinned with delivery mechanisms which address the current financial and non-financial barriers and enthuse landowners.

In June 2020 the RFS published [Woodland creation opportunities and barriers](#), a survey of RFS members' views and experience of woodland creation which clearly identifies these barriers. We recommend the following measures to address them:

2.1. Eligibility

- Extend eligibility for woodland creation grant support below 3ha and to shelterbelts less than 20m wide. More landowners are likely to engage if the lower limit to eligibility is reduced and options for participation increased.

2.2. Financial incentives

- 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 recognises early year establishment costs but woodlands continue to be a cost burden for 20 years or more before income comes on stream.

2.3. Non-financial barriers

- 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 UKFS which balances economic, environmental and social considerations make it the appropriate Defra agency to have single point accountability for forestry matters. 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 process provides a model.

3. Protecting and improving

3.1. Adaptation

The greatest threat to the health of our woodlands is the increased prevalence of pests and diseases and climate-related damage and stress. Some land managers are reluctant to invest in managing woodlands where they cannot easily access either the tools or the incentives to manage these risks. The [Forestry Climate Change Working Group](#) (FCCWG) has developed an action plan, supported by the RFS, to address this critically important agenda. Progress towards delivery of the plan is slow and requires a more focused intervention including:

- Measures which encourage high uptake of UKFS-compliant woodland management plans with adaptation interventions embedded. Compliance with the UKFS ensures that activities are balanced and proportionate, and that they meet both legal requirements and defined best practice.
- Mandatory application of decision support tools such as Ecological Site Classification (ESC), which indicate what species are likely to thrive in projected climate conditions in 50+ years,

to inform woodland creation and restocking. This is the best guarantee that the principle of “right tree, right place” is actually practiced.

- Introduction of incentives to diversify tree species and provenance on restock sites, to harness natural regeneration where appropriate and adopt low-impact silvicultural systems
- Greater flexibility in choice of site-suitable species consistent with land managers’ objectives, including non-natives.
- Investment in education and training on silvicultural skills including forest soils (an essential pre-requisite to adaptation), species selection, robust mixtures and continuous cover forestry practices.
- Funds to research and develop more resilient and productive tree species resistant to the most pernicious pests and diseases

3.2. Grey squirrels and deer

Defra, through its participation in the UK Squirrel Accord, recognises the threat that grey squirrels represent to the health and productivity of broadleaf woodland. Defra’s support for the current immuno-contraceptive research is welcome as a long-term investment in a possible solution. For the foreseeable future trapping and shooting are the only control methods and they are not being sufficiently widely adopted. The solution cannot be left to volunteers, or an expectation that nature-based solutions will make a substantial difference.

It should be a mandatory responsibility of all land managers receiving government grants to control grey squirrels. Government should be incentivising land managers both to control grey squirrels and plant more tree species which are less vulnerable to grey squirrel damage.

The over-abundance of deer is damaging woodland biodiversity. Deer control must be integral to sustainable woodland management. This is best achieved through landowner collaboration.

3.3. Bringing woods into management

In January 2019 the RFS published [*Bringing woodlands back into management: the missed opportunities England and Wales*](#). Almost 60% of hardwoods in England are reported to be neglected or undermanaged. This not only represents a substantial lost economic opportunity, valued by the RFS at £20m/pa or 250 jobs foregone, but the evidence points to a reduction in biodiversity over time and increased susceptibility to damage by pests and disease.

More woods will be managed if the following measures are adopted:

- **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 and scoring system 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:** Small woods are rarely economic based on current grant and timber/woodfuel income. 40% of woodland in England is owned in parcels of less than 20 ha. There should be greater encouragement for 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.
- **Eligibility for tax relief:** Current tax rules which qualify woods for IHT and CGT relief only if there is evidence that they are commercially managed should be reinforced and better communicated.

4. Engaging people

The RFS supports initiatives which increase the general public's awareness and understanding of trees and woods and their economic, environmental and health and well-being benefits. Forestry will thrive when there is a wider appreciation that the woods people enjoy visiting are the product of skilled management over decades and not an accident of nature. Creation of more urban and peri-urban woods and trees is to be strongly encouraged. All new schools should also incorporate a woodland, however small. The RFS will continue to contribute to this agenda through its [Teaching Trees programme](#) and active involvement in the [Tree Charter](#).

Access to woodlands creates a public benefit, but must only take place with the consent of the landowner. There are significant additional costs to managing public access which should be included in ELMS.

5. Supporting the economy

The ETS objective for woodlands to better support the economy should be embedded in objectives to expand and improve woodlands, and not a separate element. This leg of the ETS appears to perpetuate the myth that the environmental and economic benefits of woodlands are mutually exclusive. This approach has not served forestry well in the past and must be abandoned if England's forest industry is to thrive. Well managed commercial forests support both an efficient and internationally competitive processing industry and biodiversity, carbon capture and flood alleviation.

It is critical for the success of the ETS that it embraces all forms of UKFS-compliant forestry and aims to grow the domestic markets for both softwood and hardwood. This is the route to ensuring that woodlands are ecologically and financially resilient. It is in all stakeholders' interests that woodlands are a financial asset for their owners.

6. Agroforestry and trees outside woodlands

Trees outside woods are an important component of the landscape and biodiversity of farmland. The ETS is an opportunity to increase their role. Integrating trees in farmland can enhance agricultural productivity and help diversify income. The current artificial distinction between agriculture and woodland in which trees on farmland are largely neglected because they are deemed to be neither woodland nor agriculture must be dropped. The ETS needs to adopt an integrated approach which encourages farmers to establish and manage trees in whatever form best suits them. This may be agroforestry options such as shelterbelts, orchards, trees in hedgerows, farmland and parks, or stand-alone commercial options such as Christmas tree plantations and short rotation coppice/forestry. All contribute to economic and environmental goals, should be included as options in ELMS, and backed up with access to professional advice and guidance and regulated by a single agency.

7. The workforce

Raising the level of forestry education, training and knowledge transfer is vital to the success of the ETS. This is not only about professional skills (“the workforce”) but includes all those who have a responsibility for the stewardship of trees and woods. Achieving objectives to expand and improve woodland starts with well-informed, knowledgeable and engaged land managers.

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. This skills deficit is set to get worse as activity ramps up, unless it is addressed. This report needs to be updated to provide a more robust baseline.

Forestry requires a multi-disciplinary skill set that is best acquired with class-based and practical training to recognised standards which confer qualifications valued by employers. It is not an unskilled occupation at any level.

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.
- Incorporate forestry content on linked courses such as agriculture, countryside or environmental management, soil science or GIS, which recognise the diversity and interdisciplinary nature of forestry.
- 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.

A 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.

8. Research and innovation

The ETS consultation is largely silent on the importance of research to a thriving forestry sector. The UK produces world-class forest-related research, including many valued international collaborations. The RFS expects the ETS to make a clear commitment to UK-wide forestry research, identification of research priorities, funding and dissemination of applied research to practitioners.

The Royal Forestry Society

The RFS (www.rfs.org.uk) is the oldest and largest education charity dedicated to the wise management of trees and woods across England, Wales and Northern Ireland. We are a community of 3,500 individuals and organisations committed to increasing understanding of the science and practice of woodland management and to sharing knowledge and experience. Collectively RFS members are responsible for the stewardship of the vast majority of managed woodland in the areas where we operate.

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