

Cynulliad Cenedlaethol Cymru | National Assembly for Wales
Y Pwyllgor Newid Hinsawdd, Amgylchedd a Materion Gwledig | Climate
Change, Environment and Rural Affairs Committee
Ymchwiliad i bolisi coedwigaeth a choetiroadd yng Nghymru | Inquiry into
Forestry and woodland policy in Wales
FWP 15a
Ymateb gan : Confor
Evidence from : Confor

Additional information following stakeholder event
Gwybodaeth ychwanegol yn dilyn digwyddiad i randdeiliaid

· **Can you expand on the view put forward by Confor that a lack of scope to increase commercial forestry elsewhere is a barrier to restoring Plantations on Ancient Woodland Sites? The Committee has heard evidence that this is not a concern for landowners, and if a woodland has been managed properly the landowner will make money as expected.**

Our landowners and their agents tell us very firmly that losing a financial income in the long term is a very big issue in their decision to restore PAWS or not. The reality is that in the majority of Wales native broadleaves do not provide anywhere near the income that commercial softwood forestry does, sometimes no income at all. There are a few lower lying areas of Wales that will produce good quality hardwoods but it is simply not possible to grow broadleaved trees for a commercial crop above 400m due to lack of soil and high rainfall which are not good for native broadleaved trees.

We also have a huge problem with grey squirrel decimating much of our broadleaved resource making it unmarketable with the exception of the woodfuel market so we have to be realistic about what we grow and where.

Even if we could grow the broadleaved crop it would take three times as long to grow (which means we would need three times the area of forests), and be substantially more expensive, which would serve to make timber products the preserve of the wealthy.

Restoring PAWS will give an income in the short term but that diminishes as the softwood is replaced by broadleaved trees, so owners, who at present derive an income from their commercial woodlands and forests, are naturally reluctant to give that up. There is evidence, which is contained in our submission, on the impact PAWS restoration will have on the softwood availability forecast (and thus on the income of landowners), this shows that PAWS restoration will reduce the availability of softwood timber and we must address that impact, firstly to comply with UKFS, WFS and the new WB&FGA in Wales and secondly to encourage owners to restore PAWS.

Owners accept that native broadleaved forests provide other functions and benefits and most would wish to assist expanding these, however owners still have to stand the cost of long term forest management and if there is little or no income to support that they are understandably reluctant to commit to a long term strategy that is, at present, unfunded.

Historically, broadleaved management has been supported by public funds for many reasons. With the huge pressure on public funding for all sectors in Wales and the UK we see little prospect that funding will be made available to support woodland management of any kind, it surely makes no sense to create woodlands that cannot fund their own management, we simply say that there is an opportunity to embrace commercial forestry and use the income from that to support other types of forest management, it is a compromise which we know will work and we invite all stakeholders to acknowledge that.

We believe that if owners could easily and quickly replace the commercial asset they currently have on PAWS, somewhere else on other non-forested ground, then they

would be much more likely to engage with PAWS restoration. Thus we firmly believe that the present woodland and forestry creation process, which is hugely complicated and uncertain, is a barrier to PAWS restoration.

- **Do you think that NRW and the Welsh Government are doing enough to manage tree health issues, such as Larch Disease and Ash Dieback?**

Tree disease is sadly inevitable, anything that stands in the same place for many years is always going to be susceptible to any disease that comes along so we have to accept that we cannot prevent disease all we can hope to do is to minimise the impacts.

We do believe that NRW has dragged its feet on the clearance of diseased larch, whilst recognising their difficulties in the early years of the disease we continue to call for them to push forward with the disease management.

On Ash dieback, (Chalara), we believe WG has been proactive, we recognise that the ability to react to it is very limited by any organisation, public or private and the response needs to be very different to that for P Ramorum. Chalara is found in most areas of Wales now so the ability to control the disease is sadly long gone. However if we look at this as a case for how we could prevent disease in the first place we can learn lessons.

Imports are an obvious pathway for any disease to enter Wales so this could be a first area WG should be proactive in. Plants for the forestry sector and for the horticultural sector are often imported, contracts that are in control of WG to plant anything could stipulate that they must use home grown stock, we note that the new tenders for trees to restock on the WGWE by NRW do indeed contain this clause. Perhaps a condition on the Sell 2 Wales website could also contain this advice or clause which would start in address this issue in the horticultural sector.

Publicity is also a key function of WG in regard to plant health and again prevention is better than cure, a simple search on WG website for plant health reveals plenty of legislation, strategy and references to organisations but very little advice that would be useful to the general public. I note that on the WG website page for their flagship "Plant" scheme there is no mention of using only UK grown stock, leaflets on biodiversity are available on NRW and Confor websites and are printable to enable anyone to use them on their sites. As the owner of Cardiff airport perhaps WG might like to increase publicity there to help spread the message by creating signage telling the public not to bring back plants from their holidays and to clean boots and clothing, as happens in other countries.

What we also believe is imperative is that we should design forests that enable us to react to disease or change. Having a forest that is economically viable will enable the sector to react to disease or change, if the forest can pay for its own management then it can react and change, making the forest reliant on public subsidy will not enable them to react or change, a lesson we should learn from the agricultural sector.

Larch is an interesting case in point, it was a minor species with small markets, and this did create addition problems in managing the disease. Trying to fit a large volume into a small market was difficult, it was resolved but the market simply took time to react. We will never know, but if the disease had been in spruce I believe it would have been harvested without delay and marketed with ease, both would have contributed to managing the disease better.

The standard thinking that diversification of species in forests is the answer to combatting diseases, the argument goes that if you have a variety of species then some may die but others will not, whilst that may be true it removes the forests ability to pay for its own management as it is almost impossible to harvest products from a diverse woodland economically. If farmers had to plant carrots, cabbages, tomatoes and a few other crops in the same patch they could not produce food economically.

We believe diversification should be at a forest scale where you have blocks of forest types, some of mostly single species, others with a mix of species, when viewed from

above this forest would consist of a mosaic of different species and age classes over a wider area, areas designated for commercial crops would be large enough to harvest economically and native broadleaved areas would be large enough to provide biodiversity, both acting as corridors to enable anything to move between them. This incidentally is perfectly in line with UKFS in which a percentage of single species is perfectly acceptable for woodland and forestry creation.

• **Can you comment on NRW's evidence that the Woodland Strategy Advisory Panel should be "revitalised and more dynamic in its approach"? The Committee has heard evidence that the group should be opened up to a broader range of stakeholders including environmental and recreation interests.**

We are puzzled by comments on WSAP by NRW and others, there seems to be a misunderstanding on the role and purpose of WSAP and presuppose the role of WSAP as being much wider than it actually is. WSAP is an advisory panel to WG, it is not an advisory panel to NRW nor is it expected to comment on forestry or any other matters to a wider audience. The functions are to advise WG and to act as an arbiter in the case of disputes between the private sector and WG or the regulator, a specific requirement contained in the Forestry Act 1967 and subsequent legislation.

I attach the ToR for WSAP which clearly state its role and purpose.

As an advisor to WG, WSAP is not outward facing nor should it be, or it could not properly advise WG, hence it is understandable that some perhaps do not know what it does.

On the membership of WSAP, it is made up of a very wide membership drawn from many parts of the woodland, forestry, environmental, water and other sectors and does indeed include environmental and recreation interests, even some of the respondents to this consultation, and I attach the current membership. These are all volunteers participating at their own expense of money and time and as it meets only quarterly the workload has to reflect that.

As a member of WSAP I think it has indeed been very effective, some of the work is to comment on proposals from WG and some is to horizon scan and report back to WG, recent work streams include revitalising the PAWS guidance, timber supply and security, Brexit, forestry statistics, 10 point action plan and grey squirrel management plans, WSAP was also very active supplying advice in the early days of P Ramorum.

It is perfectly proper to suggest that we need a group to speak to a wider audience and maybe the role and purpose of WSAP could include that function. It could also advise NRW, interestingly NRW stated at their formation that they did not want an advisory panel, perhaps now they are losing expertise and have no forestry expertise on their board it would indeed be appropriate for them to take advice from WSAP?

However should the CC,E&RA committee think that the role and purpose of WSAP should be much wider then they should bear in mind the voluntary nature of WSAP and recommend that WG may need to commit to funding that will enable WSAP and its members to meet more frequently to reflect a much greater workload.

There is no obligation to comment on all of the points and I have copied everyone in in case you would like to give us a joint response.

Other comments

It was clear to us by the questions asked at the evidence session that the CC,E&RA committee members had little knowledge of the woodland and forestry creation process, it is a very complicated, difficult, slow, ponderous process, there is much of it that has good reason, and we acknowledge this, but it does hold back woodland and forestry creation projects and forest management. This is in our opinion the most important topic the committee and this inquiry should look at and we urge you to do so in depth.

Perhaps the committee would be willing to look at the process? We would willing facilitate this, perhaps by taking a few committee members to a woodland planners

office or maybe I could arrange for a woodland planner to come to Cardiff with a laptop and show the committee just what is involved.

Your response to oral evidence from the Woodland Trust and RSPB, and academics. I do not accept the premise that there is a lack of advice on woodland management and forestry creation as suggested, if anyone is thinking about it they need to ask, that is what happens in any walk of life, if you do not know you ask.

There is plenty of advice available through NGO's, WG and the private sector, many individuals and companies exist to do just that. WG hold a Glastir planners list, these are professional woodland planners, ICF is a professional organisation for the sector with chartered status. This advice is open to all, commercial and charitable alike, our members and others would provide advice both in a commercial setting and I am sure in a charitable setting and I know this is happening,

Llais y Goedwig is a community woodland group, funded by WG which has a wide membership and disseminates information and advice to community woodland organisations. I ensure they have access to any information that comes through me as I do for members and other organisations.

There was mention of the figure of 80000ha of woodlands not managed, I would urge caution with that figure as we have no reliable means to measure that, it is a very old figure anyway. Our only method of assessing if woodland is managed is if it is in a formal scheme and we have not had one for some years, landowners may also manage their woodlands without being in a scheme. We do know that most, 95% I think, of commercial softwood is managed so it is the broadleaved resource that is not managed. Much of this is small scale farm woodlands and this small scale is probably the reason for non-management.

Right tree in the right place was a much used phrase that we believe is unhelpful. It is largely a meaningless phrase as it is open to interpretation, just what is the right tree for any place is not defined anywhere. There are some who think that we do not want to expand the woodland or forestry area at all, many others would have differing views about which was the right tree, all would depend on the individuals or organisations aspirations for the woodland or place.