



**National Assembly for Wales' Environment & Sustainability Committee,
*Inquiry into the Public Forestry Estate in Wales*¹,
evidence by the Royal Society for the Protection of Birds Cymru², May 2014.**

1. Introduction

RSPB Cymru welcomes the opportunity to give written evidence to this inquiry. We would be happy to meet the committee to discuss this topic in person.

2. RSPB's objectives for forestry include the protection and enhancement of the wildlife of existing native woodlands in Wales, habitat management for priority birds and plants in Atlantic oakwoods, improvements to plantations for black grouse, restoring peatland habitats, conserving ffridd and breeding wader habitats. A key part of this is the sustainable approach to forest planting and management, including ensuring new woodland is carefully located to enhance, not harm important wildlife habitats, species and designated sites.
3. RSPB Cymru is a member of the forestry stakeholder advisory body to Natural Resources Wales and the Welsh Government – the Woodland Strategy Advisory Panel.

4. Purpose of the state forest in Wales

RSPB Cymru considers that a key purpose of having and running a state forest must be to protect and produce enhanced public benefits, including biodiversity. This must go beyond the minimum requirements of the Welsh Government's own forestry standard (the UK Forestry Standard) to meet their own biodiversity commitments and obligations under the Environment Strategy, the biodiversity elements of the woodland strategy, the EC Birds and Habitats Directive, the Ramsar wetland convention, as well as Natural Resources Wales' statutory duties to biodiversity and sustainable forestry.

5. This would help address declines in priority wildlife species, the extent of priority habitats, the condition of priority woodland and non-woodland habitats and designated wildlife sites. Such biodiversity enhancement as well as protection must be on a suitable scale and type to give significant environmental gain, going beyond what can practicably be achieved on non-state land through grants, policy and regulation.
6. RSPB Cymru would be highly concerned if the Welsh Government and Natural Resources Wales considered that the woodland estate they hold and manage on behalf of the Welsh people was solely focused on timber production, maximising carbon dioxide storage or purely seen as a land bank for development and capital release. This would ignore the need to manage for a range of environmental, social as well as economic objectives and do this in sustainable manner. An approach based solely around maximising timber production or carbon storage could actually cause harm to the environment.
7. We welcomed the commitment in Natural Resources Wales's corporate strategy to be an exemplar in the sustainable management of the land and water it has responsibility for, which includes the Welsh Government Woodland Estate. It is important that NRW's approach to ecosystem services and the 'ecosystem approach' properly encompasses the management of the Welsh Government Woodland Estate to protect and enhance priority wildlife species, priority habitats and designated wildlife sites.

8. Sustainable forestry objectives

The Welsh Government has a series of long-standing international commitments and domestic obligations³ to ensure forestry in Wales is carried out in a sustainable manner to deliver a range of

¹ <http://www.senedd.assemblywales.org/mgConsultationDisplay.aspx?id=120&RPID=1003783058&cp=yes>

² Registered Charity England and Wales no. 207076, Scotland no. SCO37654.

environmental, social as well as economic benefits, including the protection and enhancement of biodiversity. This applies to the management of the state forest by Natural Resources Wales.

9. The Welsh Government also has biodiversity commitments and obligations which apply to the state forest, for example in its Environment Strategy and Woodland Strategy ('Woodlands for Wales'), and under the EU Birds and Habitats Directives and Ramsar Convention on wetlands. It is important that the new approach to natural resource management, proposed under the Environment Bill, ensures that such key wildlife benefits are part of the management of the Welsh Government Woodland Estate.
10. We note that Natural Resources Wales has a duty to sustainable forestry under the 'reasonable balance' provision of Section 1(3A) of the Forestry Act 1967. This duty covers all its forestry functions, including the management of the state forest under Section 3 of the Forestry Act 1967.
11. Forest management plans on the Welsh state forest – 'Forest Design Plans' - are required by the forestry regulator, Natural Resources Wales, to meet the Welsh Government's minimum standard for sustainable multiple-benefit forestry – the UK Forestry Standard⁴ and its associated Forest Guidelines including on biodiversity. Forest Design Plans (FDPs) are written according to Natural Resources Wales' internal guidance⁵ on FDP development, revision and consultation. The area of woodland of all ownerships and types in Wales known to be managed to the UK Forestry Standard is an indicator of sustainable forest management in NRW's Corporate Plan. The UK Forestry Standard provides a *minimum standard* which NRW must ensure is met by all woodland owners, including on agricultural land and through the planning system, but we expect NRW to exceed this on the state forest to meet Welsh Government's biodiversity obligations and commitments.
12. Natural Resources Wales should consider improving the diversity of tree species and vegetation structures in its forestry plantations. We note the previous targets for conversion to continuous cover forestry, as well as the requirements of the UK Forestry Standard and UK Woodland Assurance Standard to enhance wildlife and produce more diverse forest types.
13. The design and management of state forestry plantations must also consider scope to improve their biodiversity for priority wildlife species, such as black grouse, to restore habitats, such as native woodland, semi-natural grassland and peatland.
14. RSPB Cymru would welcome the management of the Welsh Government Woodland Estate being an exemplar for sustainable forest management, with further scope for outreach, advisory and collaborative work with other woodland owners and managers. The new area based approach to natural resource management proposed in the Environment White Paper offers an opportunity for this, with connections and integration with forest plans at a regional, local authority or forest design plan level. The collaborative and advisory elements of the revised Glastir land management scheme could also offer opportunities for such landscape scale initiatives including state, public and private forests and woods to provide environmental, social and economic benefits, including for wildlife enhancement.
15. **Biodiversity delivery on the Welsh Government Woodland Estate**
RSPB Cymru has concerns about the effective delivery of national biodiversity commitments on the Welsh Government woodland estate. Welsh Government and Natural Resources Wales needs to set ambitious targets at national and regional level, translated into appropriate funding, forestry planning, design, practice and management to benefit Wales's important woodland and non-woodland wildlife.
16. RSPB Cymru is supportive of the role that the Welsh Government woodland estate could play in the delivery of Woodland for Wales and the Environment Strategy. We feel this is best expressed through the delivery of public benefits, including the protection and enhancement of biodiversity. It is important this encompasses targeted work for high value nature conservation areas, including designated and non-designated sites and features.

³ Introduced by: Forestry Commission (1991) *Forestry Policy for Great Britain*. September 1991. Forestry Commission, Edinburgh, followed by two Welsh woodland strategies; introduction of the government's own UK Forestry Standard and its associated nature conservation guidelines in 1999 (revised in 2004 & 2009), as well as international agreements such as the Ministerial Conference for the Protection of Forests 1993 Helsinki Principles for Sustainable Forest Management, 1992 UNCED Rio Earth Summit and 2002 World Summit on Sustainable Development UK Forest Partnership for Action initiative.

⁴ See: www.forestry.gov.uk/ukfs

⁵ *Operational Guidance Booklet 36 – Forest Design Planning* (2007): [http://www.forestry.gov.uk/pdf/ogb36.pdf/\\$FILE/ogb36.pdf](http://www.forestry.gov.uk/pdf/ogb36.pdf/$FILE/ogb36.pdf)

17. There needs to be enhanced biodiversity work in state and public sector woodland, meeting Wales's national, EU and international biodiversity commitments. This includes continued work for priority species. We recognise that there has been good progress made on black grouse, but there is still more ambitious forest management required to secure the future of this species. There needs to be a strategic approach to the restructuring of key existing forestry plantations for priority species, such as black grouse.
18. There is further need to restore important semi-natural habitats, both ancient semi-natural woodlands sites (PAWS), and priority open ground habitats, such as active blanket and raised bogs, that are currently forested, or being adversely impacted by state forestry. We welcome continued improvements in the biodiversity condition of priority native woodland habitats and associated priority species to meet Environment Strategy targets and designated site condition.
19. There is a need to more effectively clear up the environmental damage caused by inappropriate afforestation of peat bogs by the state on the Welsh Government Woodland Estate (as well as on private land under earlier grants/tax incentives). This is the legacy of earlier unsustainable forestry policies. Some progress has been made, but a more strategic, ambitious and widespread approach to peatland habitat restoration on the Welsh Government Woodland Estate is needed. RSPB Cymru would welcome a strategic approach by the Welsh Government to the restoration of peatland habitats across Wales.
- 20. Woodland Expansion on the Welsh Government Woodland Estate**

Key aspects of sustainable forestry under the UK Forestry Standard is the appropriate location and design of new woodland planting, as well as the management of existing native woods and plantation forests. This means that any new forestry plantations or new native woodlands proposed for the Welsh Government Woodland Estate must be located and designed to ensure that there is no indirect or direct loss or damage to important non-woodland habitats and species, such as blanket and raised bogs, ffridd, semi-natural grassland, heather moorland or breeding wading birds.
21. The Welsh Government has long standing commitments to protect and enhance wildlife, and to ensure that forestry planting and woodland management is carried out in a sustainable manner. Public forestry policy must remain for environmental, social as well as economic benefits. New woodland needs to be carefully located in the right places to help, not harm, Wales's important wildlife. The type of new woodland and how it is managed are also biodiversity issues. Wales's native woodland remnants need help to regain their value for wildlife, local people and economies. Key peat bogs damaged by forestry need their carbon storage and wildlife restored. Public funds must go beyond new plantation forestry to the care of peat bogs and native woods.
- 22. UK Woodland Assurance Standard certification**

RSPB Cymru would welcome a continued commitment to certification of the Welsh Government Woodland Estate to the voluntary UK Woodland Assurance Standard (UKWAS) to meet international Forest Stewardship Council (FSC) requirements. We do, however, stress that state forestry objectives and forest management must be to produce biodiversity enhancement and protection for priority species and priority habitats beyond this minimum level of sustainable forest management certification. UKWAS is not designed to fully meet the priority species and habitats commitments and obligations of the Welsh Government under its Environment Strategy, Woodlands for Wales, the EU Birds and Habitats Directives and the Ramsar wetlands convention.
- 23. Public consultation & scrutiny of state forest management**

It is important that the management of the Welsh Government woodland estate is subject to public consultation and scrutiny. This means that the draft corporate objectives and plan for the state forest should be publicly consulted, as well as consultation on individual proposals for forest expansion, forest management ('Forest Design Plans'), development and disposal. We would welcome further and regular scrutiny by the Welsh Assembly on the management of the Welsh Government Woodland Estate. We would also welcome enhanced scrutiny and public consultation for the management of other state/public woodland, for example woods owned by Network Rail, local authorities and the Ministry of Defence.
24. The current system of consulting on Forest Design Plans needs to ensure *all* forest management plans for the state forest are consulted publicly⁶, as well as by internal Natural Resources Wales discussions. Natural

⁶ Current system of selective public consultation: <http://www.forestry.gov.uk/forestry/INFD-5VZLSD>; background on public consultation in forestry (Forestry Commission – yet to be revised by NRW): [http://www.forestry.gov.uk/pdf/consult.pdf/\\$FILE/consult.pdf](http://www.forestry.gov.uk/pdf/consult.pdf/$FILE/consult.pdf)

Resources Wales needs to continue its practice of running a Public Register⁷ for state, public and private proposals for forestry plans, woodland planting, felling and management that it consents.

25. RSPB Cymru has concerns about how biodiversity objectives will be considered by Natural Resources Wales (NRW) for the state forest in the development and periodic revision of Forest Design Plans. This was an area where one legacy body (CCW) used to advise another (FCW – the forestry regulator), and it is critical that this advice is still provided and acted on in a transparent way now that the forestry regulator, state forest management body and statutory nature conservation body are all part of NRW. RSPB Cymru considers how well these ‘legacy bodies’ interact to protect and enhance the environment is a key measure of the success of NRW as an organisation, including for the management of the state forests.
26. Natural Resources Wales needs to make better use of its ‘Regional Advisory Committee’ (the Woodland Strategy Advisory Panel - WSAP) under the Forestry Act 1967 to advise on meeting its sustainable forestry duty for the state forest. The Welsh Government should also make better use of WSAP to advise on forestry matters including the setting of objectives, sustainability and management of the state forest.
- 27. Environmental Impact Assessment & Felling Licensing on Welsh Government Woodland Estate**

RSPB Cymru considers that it is inappropriate for the Welsh Government to exempt itself from forestry regulation that it applies to all other woodland owners – environmental impact assessment for new woodland planting proposals and the licensing of tree felling.
28. The traditional argument used for this exemption is that the Welsh Government woodland estate has forest management, felling and restocking plans and that these are UK Woodland Assurance Standard (UKWAS) certified. Other forest managers have forest/woodland management plans approved by the forestry regulator (previously the Forestry Commission, now Natural Resources Wales) as well as some other woodlands are UKWAS certified.
29. We note that when Natural Resources Wales (and Forestry Commission Wales before it) carries out development, or allows development on the Welsh Assembly Woodland Estate, it is required under the town and country planning system to conduct environmental impact assessments. It is appropriate that NRW is required to carry out environmental impact assessment for its own woodland expansion on the Welsh Government Estate and apply for felling licences for the state forest.
- 30. Management of forest plant health on the Welsh Government Woodland Estate**

Government’s forestry policy, regulation, grants, research, survey, monitoring and state forestry must continue to be for sustainable forest management for multiple public benefits. Forest plant health must not be the only objective, or focus of government activity when it comes to trees, woods and forests on state, public or private land. Government’s approach to woodland and non-woodland trees must be to protect and enhance public benefits, including biodiversity.
31. This raises questions about the underlying sustainability of how plantation forests are designed and managed, including on the Welsh Government Woodland Estate, and concerns about what the biodiversity impacts may be of new tree species planted to replace those prone to disease. Tree health is a wildlife concern, not just a timber quality or forest industry issue. Tree diseases, pathogens and pests can give rise to a range of control responses from forestry regulators depending on the infected tree species, the forest management objectives, the extent and severity of impacts. These disease control measures in themselves could negatively as well as positively impact wildlife, as well as the spread and populations of tree pathogens, pests and diseases themselves.
32. Tree, forest and plant health and biosecurity must be considered in the context of the Welsh Government’s long-term sustainable multi-purpose forestry and biodiversity commitments. This includes protecting and enhancing biodiversity, conserving historic environment, landscape and access, as well as economic and social concerns.
33. ‘Sustainable’ approaches to tree health and plant biosecurity must encompass control measures being carried out in sustainable manner. For example by avoiding disturbance to wildlife species in the timing and location of any sanitation felling, considering potential wildlife impacts of control measures, such as how habitat quality in native woods will change as a result of removal of trees and other host plants, as

⁷ Currently run on behalf of NRW by the Forestry Commission, see: <http://naturalresourceswales.gov.uk/apply-buy-report/regulate-you/public-register/?lang=en> & <http://www.forestry.gov.uk/publicregister>

well as disease eradication, to which pathogens, pests and diseases are selected for research, survey and monitoring and how is this carried out.

34. The current disease control measures for *Phytophthora ramorum* – felling larch plantations and removal of rhododendron plants in woodlands - need to be considered in broader terms of protecting and enhancing public benefits, such as wildlife and historic environment, and carried out in a sustainable manner. This includes carefully considering the potential wildlife impacts of any replacement tree species for larch and potential threats to heather, other plants and non-woodland habitats posed by *Phytophthora ramorum*.

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