

## FWP 22

Ymateb gan : Cyswllt Amgylchedd Cymru  
Evidence from : Wales Environment Link

### Introduction

1. The need for action to protect woodlands and trees and to create and plant more of them has never been greater. Current practices are driving unsustainable pressures on soil, water resources and biodiversity, while tree disease and the constant pressure of development threaten our woodland resource. We need to act now to ensure that Wales makes the fullest possible use of trees to tackle major environmental problems. By investing in woodlands, Wales will secure multiple environmental benefits and in doing so we will also secure social and economic benefits that woodlands bring through the creation of jobs and money saved.

### Summary of Key Recommendations

2. We urge the Welsh Government to undertake the following recommendations:

- a) Develop a new overarching Sustainable Land Management policy for Wales, that combines agriculture, forestry and the environment and provides an incentive framework for multiple benefits.
- b) Revise forestry regulations in Wales based on the Sustainable Management of Natural Resources and the Biodiversity and Resilience of Ecosystems Duty.
- c) Establish grant support for woodland management, lacking since the loss of Glastir Woodland Management, to protect our internationally important woodland habitats and the biodiversity they support.
- d) Fully evaluate the effects of tree planting (including those as part of the Welsh Government's 100,000 ha woodland creation target) to maximise benefits and avoid negative impacts.
- e) Incentivise appropriate and well planned planting that delivers net GHG emission reductions, flood alleviation and improved water management.
- f) Protect, restore and enhance our ecosystems by reversing the trend of loss and degradation of trees and woodland, and achieving resilient and diverse tree cover across Wales.
- g) Increase grant support for woodland creation, including the expansion of deciduous and native woodlands in both urban and rural areas, as well as natural regeneration and tree planting to support biodiversity by extending, linking and buffering existing woodland without jeopardising biosecurity.
- h) Support appropriate management of forestry (particularly afforestation) to prevent adverse impacts of coniferous forestry upon the Welsh environment.
- i) Protect all remaining ancient woodland and ensure no net loss of native woodland.
- j) Ensure the 'right tree in the right place' principle is adhered to across the land use sector, including regard for the landscape scale.
- k) Promote better engagement between the forestry and environmental NGO sectors to encourage more sustainable woodland proposals and improve the natural environment in order that the forestry industry can become exemplars of sustainable development
- l) Integrate a fully functioning Woodlands for Wales Strategy and urban tree planting with the Local Well-being Plans and Area Statements.

- m) Increase public awareness of and involvement with woodland biodiversity and conservation, including tree planting and woodland education in the National Curriculum.
- n) Increase funding for access and the community woodland sector with a geographical expansion of the area they cover.
- o) Make improvements to the implementation of policy, such as Planted Ancient Woodland Site restoration, protection of deep peat, and the use of trees in catchment management.

## Leaving the European Union

**3.** As the UK transitions away from the Common Agricultural Policy, we must develop a new sustainable land management policy for Wales that supports not only sustainable, but ecologically restorative measures, to address the scale of biodiversity loss and degradation to our ecosystem services. Historically, the separation of agriculture and forestry policies have undermined each other, and Welsh Government interpretations of the EU Basic payment criteria has penalised Welsh farmers for having trees on their land, despite Welsh Government policies which encourage land managers to plant more trees<sup>1</sup>. A new land management policy must correct these distortions and provide outcome focussed incentives that:

- a) Combine agriculture, forestry and the environment into a fully integrated sustainable land management policy.
- b) Support and create the multiple benefits and outcomes of sustainable land management.
- c) Invest public money in public benefits that stem from sustainable land management including biodiversity, water quality and flow, carbon sequestration and storage.
- d) Build public understanding of the value of the natural environment and the role of consumer choice in supporting sustainable land management, as well as providing opportunities for land managers to upskill.
- e) Establish adequate minimum standards for ecologically sustainable timber production for example, through full implementation of the UK Forestry Standard and encourage support for definitive and independently audited UK Woodland Assurance Standard (UKWAS).

**4.** Wales and the UK must continue to address transnational issues such as the rapid rise of pests and diseases affecting woodlands, which continue to require coordinated action across the UK and beyond.

## Responding to Climate Change

**5.** Well managed woodland, forests and trees have a key role in mitigating, adapting to, and making Wales more resilient to climate change. Wales must meet its 2050 target to reduce GHG emissions by at least 80% from baseline levels (Environment Act, 2016), but will not achieve this long-term climate target without investment in landscapes that sequester carbon. To help reach this target we believe the Welsh Government's Wales Climate Change Strategy (2010) to create 100,000 ha of new woodland between 2010 and 2030, (amounting to 5,000 ha per annum) has the potential to contribute to climate mitigation if carried out effectively with the right tree in the right place principle and the right end-use of timber. However, implementation has been inadequate with only 3,205 ha of woodland created in Wales between 2010 and 2015 (with 100 ha created over the last two years<sup>2</sup>). The action plan progress shows that only around 140 ha of new woodland was created by March 2016<sup>3</sup>, less than 3% of the original target. These figures highlight the urgency for a step-change in the rate of progress if the 2030 targets are to be realised, but success must be based around the multiple benefits we need to deliver, not just simplistic stand-alone targets.

**6.** Moving away from the current disincentives resulting from the CAP, towards a new sustainable land use policy that incentivises landowners to plant the right trees in the right places will be vital if

<sup>1</sup> The rules required every farmer in Wales to accurately map clusters of trees over 100m<sup>2</sup>, and subtract this from the eligible land area.

<sup>2</sup> [https://www.forestry.gov.uk/pdf/Ch1\\_Woodland\\_FS2016.pdf/\\$FILE/Ch1\\_Woodland\\_FS2016.pdf](https://www.forestry.gov.uk/pdf/Ch1_Woodland_FS2016.pdf/$FILE/Ch1_Woodland_FS2016.pdf)

<sup>3</sup> <http://senedd.assembly.wales/documents/s57936/Letter%20from%20Cabinet%20Secretary%20on%20issues%20arising%20from%20Committee%20work.pdf>

Welsh Government are to reach their tree planting targets. However, barriers to woodland creation include a lack of well designed, sustainable and appropriately located woodland proposals. Welsh Government criteria must fully distinguish environmentally beneficial tree planting and grant systems must not support planting that could cause environmental damage. If this could be robustly addressed, a real barrier to beneficial woodland creation would be removed.

7. Welsh Government must also prioritise:

- a) Appropriate grazing to allow for natural regeneration.
- b) Restoring peatlands that are currently under coniferous woodland (11,232 ha of coniferous woodland exist on deep peat ([Forest Research, 2012](#))<sup>4</sup> – much of which is publicly owned by Welsh Government).
- c) Undertaking a robust carbon assessment of commercial forestry<sup>5</sup>, that accounts for the end-use of timber products including use for bioenergy.
- d) Improving the condition of existing woodland through appropriate management, to enable priority species to adapt to climate change.

8. As recognised by the Land Use and Climate Change group<sup>6</sup>, creating additional woodland in the right places can be a very effective way of adapting to climate change and creating a landscape more resilient to extreme weather. When appropriately located, trees can provide a sustainable and low maintenance solution to lessening the risk of flooding<sup>7</sup> to homes across Wales.

9. We support NRW's peatland restoration proposals, and encourage NRW to increase their peatland restoration work around removing trees from afforested deep peat<sup>8</sup>. However, the issue of compensating for the loss of tree cover through this mechanism has not sufficiently been addressed and is contributing to the difficulties of reaching targets for increased woodland cover. Formal processes such as local impact assessments are needed to address other biodiversity issues associated with some deep peatland restoration, for example the loss of important red squirrel feeding zones in the Tywi Forest in mid-Wales. By increasing arboreal linkages and adjusting re-stocking elsewhere within the forest, compensation for the local loss of biodiversity features or resources that meet other targets can be made.

10. Whilst restoring peatland habitats, consideration must also be given to the impact existing upland forestry plantations are having on the ability of these habitats, including blanket bog, to sequester and store carbon. The location of these plantations and the prevalence of potentially invasive species such as sitka spruce, which self-seeds on to the blanket bog leading to drying out of the carbon storing peat soils and subsequent release of carbon, is one of the leading factors in the failure of many internationally important designated sites to achieve favourable condition. The ongoing need to manage self-seeding conifers also has significant cost implications and limits the ability of these areas to store carbon and water and impacts on wildlife found in these areas.

## Woodlands for People

11. Covering nearly 6% of the land area of Wales, the public forest estate is a vitally important asset that has the potential to provide huge benefits for the people of Wales. We commend the Welsh Government's commitment to retaining this public asset and would like to see decisions on the future of the estate, to be made transparently in the public interest of sustainable development.

12. Woodlands benefit people in multiple ways, including social, economic and cultural benefits, both in cities and rural areas<sup>9</sup>. The strategic planting of woodlands can benefit people because they:

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<sup>4</sup> Both deep peat and blanket peat

<sup>5</sup> Carbon assessments must account for the fact that most forest is on clear-fell rotation (and is therefore not maintained woodland cover as it is stated in most sequestration calculations) and the impact of other such detailed management considerations such as Recognising and accounting for the potential for albedo (warming) effect of conifer plantations compared to native broadleaves (K, Naudts, et. al., 2016)

<sup>6</sup> <http://gov.wales/topics/environmentcountryside/farmingandcountryside/farming/land-use-climate-change-group/?lang=en>

<sup>7</sup> <https://www.woodlandtrust.org.uk/publications/2014/01/holding-back-the-waters/>

<sup>8</sup> Recognising that in these cases climate change targets can more effectively be reached by tree removal than by re-stocking

<sup>9</sup> See:

- a) Provide a range of ecosystem services that benefit people in a variety of ways.
- b) Reduce the impact that severe weather events have on people.
- c) Aid climate change mitigation of the land use sector.
- d) Enhance resilience and productivity of farms.
- e) Provide attractive landscapes and opportunities for tourism and recreation.
- f) Provide clean air and reduce noise pollution.
- g) Help build community action.
- h) Provide a green restorative environment for people.
- i) Increase and improve community cohesion and reduce anti-social behaviour.
- j) Enable distinct cultural practices and locally specific art and literature.
- k) Create forestry sector jobs protecting rural communities.
- l) Support biodiversity thereby safeguarding the natural systems that provide a range of ecosystem services.

**13.** Funding to increase the number of community woodland groups (such as those within the Llais y Goedwig network) and the areas they cover should be expanded. Policies must provide opportunities for people to increase their experience of woodland wildlife, to get involved in using and managing woodland and in biodiversity conservation, and to benefit physically and psychologically by doing so. The connection between children and woods and trees should also be developed, with every child having the direct opportunity to plant trees through the National Curriculum. The educational value of woodland must be materialised together with the provision or retention of interpretation centres in appropriate forest areas. Budgets from health, education, infrastructure, tourism and business ought to contribute.

**14.** While the economic commercial benefits of woodland are significant, the Office for National Statistics has recently estimated that the value to our economy of recreational access to woodland is nearly 10 times that of the value of timber outputs (Office of National Statistics, 2015)<sup>10</sup>. The economic and social value of forest cycle trails, public footpaths, bridleways and designated open access areas in Wales must be appropriately harnessed. Local woodland access projects have previously been supported by grant funding from Forestry Commission Wales. However, a reduction in NRW funding, alongside a realignment in focus on new projects and landscape-scale schemes, has had an adverse monetary impact on local groups and charities. This lack of funding has exacerbated public access maintenance, woodland development and the associated financial liabilities. It is also vital that the right to roam in Government owned forests is maintained and that additional rights of way in other forests are provided and maintained to an acceptable standard.

**15.** Greater benefits to people was evidenced through reversing the decline in urban tree cover between 2009 and 2013 (NRW, 2016) and further international evidence demonstrates the massive health and well-being benefits afforded by tree-filled green space. Yet tree cover in our towns and cities varies from 33% in Trimsaran to just 5% in Rhyl. We suggest that every town and city in Wales should benefit from a minimum of 20% tree canopy cover<sup>11</sup>, with support for native trees that provide habitat and nectar for pollinators, and fruit trees which provide a sustainable source of food.

**16.** As evidenced by the Wrexham iTree Report by Forest Research<sup>12</sup>, trees in urban locations save the local economy more than £1.3m every year by:

- a) intercepting 27 million litres of rainfall from entering the drainage system;
- b) saving the equivalent of £460,000 in sewerage charges;
- c) absorbing 1,329 tonnes of carbon dioxide from the atmosphere and

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- The Wildlife Trusts Wales Green Infrastructure: A Catalyst for the Well-being of Future Generations of Wales (Wildlife Trusts Wales, 2016)
  - Woodland Trusts – Wales is better with trees (Woodland Trust, 2016)
  - Wildlife Trusts Wales evidence to the Climate Change, Environment and Rural Affairs Committee on Air Quality (Appendix 3 of Wildlife Trusts Wales' response to this Inquiry).

<sup>10</sup> <https://www.ons.gov.uk/economy/environmentalaccounts/bulletins/ukenvironmentalaccounts/2015-07-09#tab-Woodland-ecosystem-asset-and-services-accounts>

<sup>11</sup> <http://www.woodlandtrust.org.uk/blogs/woodland-trust/2016/01/give-us-more-trees-in-our-towns/>

<sup>12</sup> <https://www.forestry.gov.uk/fr/beeh-9t8dzh>

- d) removing 60 tonnes of air pollution, saving the health services £700,000 through improved health.

## **The Well-being of Future Generations (Wales) Act 2015**

**17.** The State of Natural Resources Report (SoNaRR) underlines the role of woods and trees in delivering the goals in the Well-being of Future Generations (Wales) Act<sup>13</sup>. The Woodlands for Wales Action Plan clearly sets out how each of the areas of priority action, particularly supporting native woodland creation and management, deliver against all the Well-being goals. However, we feel that delivery against the goals is currently falling short due to a lack of action to increase the area of native woodland in Wales or to support landowners to bring existing woodland into better management. Additionally, 'Globally Responsible Wales' is not included in the Action Plan, yet should be a constant focus alongside other elements of the Strategy requiring carbon sequestration and provision of habitat for internationally important species. The Woodlands for Wales Strategy and the need to plant urban trees should be integral to the development of the Local Well-being Plans.

## **Environmental Quality**

**18.** Coniferous woodlands do provide last refuges for some iconic Welsh wildlife such as red squirrels and black grouse. However, most biodiversity associated with coniferous plantations results from adjacent habitats or remnant habitats found in open spaces or woodland rides within the plantation, such as heathland. Conversion to forestry plantations as well as urban and agricultural development has led to the loss and damage of native woodlands and has caused direct loss or fragmentation of vital habitats. Low diversity afforestation using principally coniferous species has also had detrimental impacts upon ecosystems services such as water supply, landscape quality and biodiversity. Low grade agricultural land is often targeted for afforestation in ways that compromise these crucial services.

**19.** Areas of heathland, blanket bog, deciduous forests, meadow and other internationally important habitats planted with conifers must be restored with urgency. Existing coniferous woodlands should be enhanced by diversifying tree species and structure, extending rotation lengths and introducing alternative silvi-cultural systems such as shelterwood, continuous cover and Low Impact Sylvicultural systems (LISS) managed at a landscape scale to ensure continuous habitat connectivity. The impact of existing coniferous woodlands on adjacent open habitats must also be urgently addressed.

**20.** Trees next to rivers and streams also create important spawning grounds and reduce water temperatures, increasing oxygen levels for aquatic ecosystems. The Forestry Commission and Environment Agency Woodland for Water report demonstrates the importance of broadleaved woodland creation in appropriate locations. It explains how woodland can help with multiple benefits, including water management and water quality objectives; tackling diffuse pollution via interception; trapping or retaining nutrients and sediments in polluted runoff; protecting river morphology and water temperature moderation; mitigation of downstream flooding; slowing runoff and reducing fertiliser and pesticide loss into watercourses; and protecting soils from erosion and sedimentation. The report provides international evidence on a range of successful incentive schemes for water-related woodland services and supports the use of woodland measures to meet water quality objectives in River Basin Planning cycles. The Forest and Water Guidelines should also be reviewed and strengthened to protect and benefit the water environment, including discontinuing forestry pesticide (cypermethrin) spraying and large-scale clearfelling.

**21.** Ancient woodland is the richest, most valuable and irreplaceable habitat for Welsh wildlife yet only 5% of Welsh land remains ancient woodland. Threats continue, even from developments by the Welsh Government itself (the M4 would impact 5 ancient woodlands), despite their protection in planning policy. The latest round of LDP housing development proposals may destroy many more unless the Ancient Semi-Natural Woodland is retained within the development. Welsh Government

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<sup>13</sup> See pg9 of the Summary.

must commit to restoring all Planted Ancient Woodland Sites (PAWS) and protecting all semi natural and ancient woodland via Planning Policy Wales. Private landowners must also be encouraged to act in accordance with this. We also encourage the Welsh Government's T&F Group to strongly consider providing statutory protection for Wales' ancient, heritage and veteran trees and to implement the group's recommendations.

**22.** Ambitious targets for the strategic expansion of deciduous native woodland cover must be set. Natural regeneration and new tree planting must also be encouraged to extend, link and buffer existing woodlands. Bespoke, geographically targeted programmes should be incorporated into woodland management to accommodate the needs of priority species requiring intervention, such as red squirrels.

**23.** The type of tree, its origin, and the nature of the land on which it is planted (and its alternative habitat restoration potential) all dictate whether woodland creation has a positive or negative net outcome. Area planting targets must include these considerations by adopting the 'right tree in the right place' principle. However, it must also be recognised that the quality of Welsh woodlands, particularly ancient woodlands, has been jeopardised by an over-reliance on planting, especially of non-native species rather than natural regeneration. This has largely been driven by forestry grants.

**24.** Forestry management must prevent further entry of invasive alien organisms. Forests must be diversified to increase resilience against devastation such as *Phytophthora ramorum*, including areas of the public estate that have been affected. Deciduous conifer plantations retained diverse field layers, but with the loss of Larch to *Phytophthora* there are limited alternative deciduous species to replace Larch. The impact of imported saplings and British seeds being bought from mainland Europe has already been highlighted as one of the means of introduction of Ash Dieback (also introduced via aerial spores). Planting of infected seedlings greatly exacerbated the spread of the fungus, resulting in 60% of 10km<sup>2</sup> in Wales showing some infection by October 2016. More efforts should be made to allow woodland creation through natural regeneration that ensures the local provenance and suitability without biosecurity risks, and an innovative approach could be trialled for non-commercial woodlands. These are all important investments which will pay off quickly through bringing about multiple environmental benefits.

**25.** Key recommendations:

- a) Deciduous woodlands are significantly more important for biodiversity and must be encouraged.
- b) The Government must commit to protecting and enhancing the remaining ancient woodland and there must be no net loss of native woodland.
- c) The ecological condition of woodland resources must be improved through adopting the 'right tree in the right place' principle, enabling appropriate grazing, and the prevention of further entry of invasive non-native species.
- d) Areas of heathland, blanket bog, deciduous forests, meadow and other internationally important habitats planted with conifers must be restored with urgency.
- e) Native Welsh woodland must be increased and enhanced, contributing to international and national biodiversity duties through the provision of habitats and migration routes.
- f) Improvements in policy implementation must be made, such as PAWS restoration and the use of trees in catchment management.
- g) Grant schemes must be created for woodland management not solely focussed on commercial forestry and public access.
- h) Co-ordinated effort to bring the 80,000 ha of existing unmanaged woodland into appropriate sustainable management.
- i) The Welsh Government Woodland Estate must be managed to provide an exemplar of multi-purpose woodland, including management to enhance the biodiversity value of the estate.

## Contribution to the Environment (Wales) Act 2016

**26.** Ecosystems in Wales have undergone significant degradation resulting in negative impacts on biological diversity. None of Wales' ecosystems are resilient, severely impairing their capacity to provide essential ecosystem services. Therefore, before we can maximise the benefits from ecosystems we must first restore and enhance them.

**27.** Ecosystem restoration is a significant part of the Ecosystem Approach (Principle 5 of the Convention on Biological Diversity, Ecosystem Approach Principles<sup>14</sup>) and thus the sustainable management of natural resources (SMNR) in informing the negotiation of land use options and enhancement of healthy ecological networks. The Woodlands for Wales Strategy should be integral to the development of the Area Statements, including the need to plant urban trees and consider the landscape.

### A Competitive and Integrated Forest Sector

**28.** The multiple services provided by woodlands value a typical urban woodland at around £130,000 per hectare and a lowland broadleaved woodland £150,000 per hectare. However, despite recent progress, there are still plenty of examples of poor practice, causing soil erosion and sedimentation of rivers; biodiversity displacement in felling areas; damage to peatland habitats; and the unnecessary loss of veteran and non-harvestable trees during felling operations. There must be an end to support for environmentally damaging activities such as the routing of timber lorry transport through forest roads instead of using an available road network, and the use of forest roads for rally events. Work done by Forestry Commission and Office of Natural Statistics determining the value of social and environmental benefits of woodlands has been important. However, further research is required to identify the potential negative impacts of inappropriately located forestry, the findings of which must be acknowledged and acted upon by NRW and Welsh Government.

**29.** For example, inappropriate afforestation has a significant adverse impact upon the ecology of Wales, which in turn affects the economic value of other sectors. The industry must urgently address the following adverse impacts of afforestation:

- a) Coniferous forests have replaced native, biodiversity rich habitats such as peatlands, heathlands and ancient woodlands.
- b) Coniferous forests virtually eliminate native ground vegetation, except in rides and unplanted land, causing major negative impacts at the landscape level.
- c) Significant impacts upon soils including peatlands resulting in the release of carbon into the atmosphere and watercourses in the form of dissolved organic carbon.
- d) Acidification of watercourses<sup>15</sup>.
- e) Cultivation, drainage, road building, felling, harvesting and restocking impacts.
- f) The impact of fertilisers and pesticides such as Cypermethrin, which is highly toxic to fish, bees and aquatic insects.
- g) Conifer self-seeding on peatland from neighbouring plantation forestry, for example, the Berywn SSSI.

**30.** There is also a need for financial support for management of woodlands beyond commercial forestry. Since support for the Glastir Woodland Management scheme was withdrawn, there is little to no support for management of woodlands for biodiversity, environment and landscape. Wales holds 40% of the UK's internationally important upland oak woodland habitat, but since this scheme was withdrawn grant mechanisms have been focussed on woodland creation and

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<sup>14</sup> Principle 5: Conservation of ecosystem structure and functioning, in order to maintain ecosystem services, should be a priority target of the ecosystem approach. Ecosystem functioning and resilience depends on a dynamic relationship within species, among species and between species and their abiotic environment, as well as the physical and chemical interactions within the environment. The conservation and, where appropriate, restoration of these interactions and processes is of greater significance for the long-term maintenance of biological diversity than simply protection of species. <https://www.cbd.int/ecosystem/principles.shtml>

<sup>15</sup> by scavenging of acid deposition, base cation uptake, the scavenging and concentration of sea salts, soil drying and the formation of an acid litter layer at the soil surface.

supporting commercial forestry rather than supporting management of habitats of global significance. If we are to achieve the Well-being goals and meet our international commitments in relation to biodiversity, addressing the imbalance in grant support for woodlands must be addressed.

**31.** We urge forestry industries and managers to be exemplars of sustainable development by contributing to the natural capital value of woodlands. Plantation forests could in future have a vital role to play in providing quality habitat for wildlife and contributing more widely to habitat networks and ecosystem services, but only if forest managers take greater account of biodiversity in their operations. There is a duty on Welsh Government to deliver best practice on its own estate and initiatives such as the Wildlife Trusts Red Squirrel Partnership help secure improvements in practice. We hope that support for the UK Woodland Assurance Standard will continue to grow and that industry expands its adoption of ecologically sensitive designs for new plantations to retain open ground habitats such as peatlands. Native species must be incorporated as an integral part of the forest rather than an afterthought.

**32.** Continuous cover forestry and low-impact silvi-cultural systems are approaches which could help achieve multiple benefits. Improved guidance coupled with woodland planting and management grant incentives will be key. We urge the forestry sector to work constructively with environmental NGOs in Wales to continue to drive up standards and create nature-rich forestry plantations that work economically, socially and ecologically. Better engagement between the forestry sector and NGOs should be promoted by NRW to assist collaborative work such as active input by NGOs into Forestry Management Plans.

**33.** More work needs to be done to integrate the operations of the Forestry Commission legacy staff and structures into NRW to be delivering the multiple outcomes of forestry. The financial contribution of commercial forestry within NRW also needs to be better understood, in terms of the significant overheads related to forestry. This matter requires urgent scrutiny given the dis-benefits and environmental externalities of commercial conifer plantations. The future process for stakeholder engagement in forest resource planning should be transparent, with sufficient lead-in time to allow for meaningful stakeholder engagement. Adherence to agreed Forest Design Plans must also be overseen.

**34.** Lastly, CONFOR are calling for an increase in forestry, but there needs to be an urgent re-examination of industry regulation. For example, the private forestry sector doesn't have to follow the voluntary codes or guidance of the Forest Stewardship Council (FSC) and UK Forestry Standard (UKFS). We should be producing new forestry regulations in Wales based on the SMNR and Biodiversity and Resilience of Ecosystems Duty.

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**Wales Environment Link (WEL)** is a network of environmental, countryside and heritage Non-Governmental Organisations in Wales, most of whom have an all-Wales remit. WEL is officially designated the intermediary body between the government and the environmental NGO sector in Wales. Our vision is a healthy, sustainably managed environment and countryside with safeguarded heritage in which the people of Wales and future generations can prosper. This paper represents the consensus view of a group of WEL members working in this specialist area. Members may also produce information individually in order to raise more detailed issues that are important to their particular organisation.

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