

RSPB Evidence to the Climate Change, Environment & Rural Affairs Committee Inquiry into Forestry & Woodland Policy in Wales.

1. Introduction:

1.1 Cymru welcomes the opportunity to participate in the Committee's inquiry into Forestry and Woodland Policy in Wales, and we would welcome the opportunity to illustrate some of the points raised through visits to relevant sites to discuss the issues in more detail.

1.2 RSPB Cymru's objectives in relation to forestry and woodland include:

- The protection and enhancement of existing native woodlands, through appropriate management to support priority species and habitats.
- Ensuring new woodland creation is appropriately located to avoid negative impacts on biodiversity.
- The protection and restoration of open habitats including peatlands, heathlands and priority grassland habitats.
- Promoting a new Sustainable Land Management policy for Wales which integrates all areas of land use including woodland and forestry policy.

2. Key Recommendations

2.1 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) Establish grant support for woodland management to protect our internationally important woodland habitats and the biodiversity they support.
- c) Ensure the 'right tree in the right place' principle is adhered to, to protect against environmental damage including impacts on open habitats and the species they support.
- d) Ensure appropriate monitoring is in place to fully evaluate the effects of tree planting on biodiversity.
- e) Take steps to address the current damage to open habitats caused by existing forestry, including impacts on neighbouring open habitats of international importance.

3. Delivery of Woodlands for Wales Strategy

3.1 The 2016 State of Nature report¹ showed that 11% of woodland species in Great Britain are threatened with extinction, and climate change is one of the key pressures on biodiversity. At present there is little evidence to suggest the Woodlands for Wales Strategy is delivering for woodland biodiversity at the scale required to deliver on Wales' international commitments to biodiversity. If we are to see real progress in delivering our biodiversity commitments there will need to be a step change in the approach and implementation of policies linked to woodland and forestry biodiversity.

4. Responding to climate change –

4.1 When considering how woodlands and forestry can contribute to Wales' response to climate change there are a number of factors impacting on biodiversity, these include:

- The availability of suitable habitat of sufficient quality and extent.

4.2 In order to allow woodland biodiversity in Wales to adapt to climate change we must ensure our existing woodlands are of sufficient quality to support resilient populations that are able to adapt to the pressures of climate change. Since the withdrawal of Glastir Woodland Management, Wales has no specific mechanism to support management for woodland biodiversity. This lack of management means many of our woodlands, including sites designated to support populations of internationally important species are deteriorating in quality and thereby failing to provide the conditions required to allow priority species to adapt to climate change.

- Restoring afforested peatlands and other afforested habitats to improve the resilience of the ecosystems to aid climate change adaptation.

4.3 Our greater understanding of ecosystems and how they function has shown that historical decisions on the location of woodland plantations, driven by the need to secure a national timber resource, have led to degradation of ecosystems and contributed to the release of large amounts of carbon formerly locked up in peat rich soils, permanent grassland habitats and native woodlands. In order to secure the future of these habitats we must ensure they are restored to form resilient habitat networks that are better able to adapt to climate change, and therefore can continue to provide the range of ecosystem services on which we depend.

- Connecting fragmented habitats.

4.4 Improving the quality and extent of available habitat and the restoration of afforested habitats is only part of the puzzle in ensuring Welsh ecosystems are resilient in the face of climate change. If we are to secure the future for a range of ecosystems ensuring habitats are

¹ Available at: <https://ww2.rspb.org.uk/our-work/stateofnature2016/>

suitably connected to allow the species they support to move in response to changing climate and to connect with wider Welsh populations to provide genetic diversity and thereby population resilience is critical. Without this connectivity fragmented habitats are more susceptible to the impacts of climate change and isolated populations of wildlife are less able to adapt.

- Ensuring end use of timber is factored in when calculating the carbon benefits of woodland creation.

4.5 When considering the contribution forestry can make to responding to climate change the end use of timber products must be considered. Whilst fast growing conifer species may provide an initial boost to carbon sequestration, the end use of this timber can significantly impact on the carbon benefits. In comparison broadleaf species as part of multi-purpose woodlands can provide longer term benefits for carbon whilst providing habitats for species and a range of additional benefits. Ensuring these factors are considered when targeting support for tree planting to provide carbon benefits is critical.

5. Woodlands for people – serving local needs for health, education and jobs.

5.1 Recent Welsh Government decisions on woodland and forestry have been driven by delivering the target of 100,000ha of new woodland in Wales by 2030. RSPB Cymru believes that a focus on a simplistic area target has potential to drive perverse outcomes that negatively impact on delivery of a range of ecosystem services including biodiversity, water quality and carbon storage. A targeted approach to tree planting based around delivery of multiple benefits would be far more positive and would encourage more sustainable tree planting. For example encouraging and supporting tree planting aimed at delivering for biodiversity, which would provide additional benefits in terms of carbon, water and recreation benefits would represent a greater public benefit than an approach solely focused on timber production or maximising carbon storage which could actually cause harm to the environment.

6. A competitive and integrated forest sector – innovative, skilled industries supplying renewable products from Wales.

6.1 The Welsh Government has a series of long-standing international commitments and domestic obligations to ensure forestry in Wales is carried out in a sustainable manner to deliver a range of environmental, social as well as economic benefits, including the protection and enhancement of biodiversity. The UK Forestry Standard ² (UKFS) provides a *minimum standard* which Welsh Government must ensure is met by all woodland owners, including on agricultural land and through the planning system, however we understand there is little or no on the ground monitoring to ensure woodland and forestry planted with grant support is meeting the UKFS. In order for Wales to achieve its international commitments to biodiversity we must ensure all grant funded woodland and forestry creation is delivering its obligations under the UKFS and this can only be sufficiently assured through monitoring of the impacts of new woodland and forestry.

² <https://www.forestry.gov.uk/ukfs>

Environmental quality – making a positive contribution to biodiversity, landscapes and heritage and reducing other environmental pressures.

7. Woodland Creation

7.1 A key factor in future woodland creation must be adherence to the ‘right tree in the right place’ principle. Ensuring woodland creation meets the minimum requirements as set out in the UK Forestry Standard including in relation to protecting priority habitats and species is critical, and consideration of impacts on open habitats and the species they support must be central to locating new woodlands. The current Welsh Government Woodland Opportunities map³, used to guide woodland creation in Wales, offers some consideration for priority species but this is limited and is subject to the quality of the underlying data. In order for the map to be of real value in the long term regular updating of the underlying data must be undertaken including appropriate species and habitat surveys.

7.2 At present there is a lack of monitoring of the cumulative impacts of tree planting on biodiversity, Glastir Woodland Creation and the Glastir Small Grants scheme, underpinned by the 100,000ha tree planting target, are driving small scale tree planting. With the aspiration to increase tree planting under Glastir we must ensure the wider impacts of tree planting on biodiversity are monitored and fully understood if woodland and forestry in Wales is to be truly sustainable.

8. Woodland Management

8.1 The lack of a targeted scheme for woodland management has limited the ability to deliver positive contributions to biodiversity. Whilst grant funding has focused on woodland creation, restoration of forestry and woodland impacted by disease and supporting timber businesses there has been little support for woodland management which contributes to biodiversity, landscapes and heritage and reducing environmental pressures. The lack of a woodland management scheme also restricts the ability to bring the 80,000ha of existing unmanaged woodland in Wales into management which could provide a significant contribution to meeting Wales’ international commitments to biodiversity as well as helping species adapt to climate change. Bringing these woodlands into management could also provide economic and social benefits.

8.2 Some of the most important woodlands in Wales are the Atlantic Oak Woodlands found in Mid and North West Wales, these ancient woodlands are home to a wide variety of species including internationally important lower plant communities such as the lobarion lichen communities, and birds such as redstarts and pied flycatchers, migrant species that travel from Africa to spend their summers in the woodlands of Wales.

³ <http://lle.gov.wales/catalogue/item/GlastirWoodlandCreationOpportunitiesMap/?lang=en>

8.3 Wales holds 40% of the UK's Atlantic Oak Woodlands and their importance is reflected in their international designation as Special Areas of Conservation. If Wales is to achieve its international commitments to biodiversity then securing these priceless ancient woodlands is critical. The implementation of current Welsh Government policy contradicts the guidance on how to manage these woodlands, for woodland entered in the former Glastir scheme there was a presumption against grazing, directly contravening the advice given by NRW that grazing is required to maintain the right conditions for many of the priority species. Where light grazing was allowed, the levels of grazing were far too low to overcome the historic lack of grazing, thereby limiting the ability of the sites to achieve favourable condition. In addition scheme rules restricted any activity above and beyond that funded through the scheme, meaning additional positive management for biodiversity is discouraged. If we are to secure these Celtic rainforests for future generations then addressing the mismatch between policy and the requirements of the habitats is critical and must be reflected in future support mechanisms.

8.4 RSPB Cymru has worked with NRW and Welsh Government to overcome some of the hurdles on a number of sites, however many private woodland owners would have neither the knowledge or time required to address the issues, future support mechanisms must be sufficiently flexible to allow the requirements of individual sites to be considered and must come hand in hand with expert advice and guidance on how to manage woodlands for priority species and habitats.

9. Protecting Open Habitats

9.1 Due to the historic location of many forestry plantations, including much of the Welsh Governments Woodland Estate, there are many instances where forestry is negatively impacting on habitats of international importance. Non-native species such as sitka spruce are self-seeding on to neighbouring open habitats and leading to the failure of many designated upland sites to achieve favourable conservation status. This has a number of impacts including degrading peatlands, such as blanket bog, and leading to the release of carbon previously locked up in the peat⁴. As well as contributing to climate change these degraded peatlands are less able to store water which can contribute to downstream flooding and the erosion caused by increased run-off can lead to water quality issues driving the need for increased water treatment costs and the subsequent increase in customer prices.

9.2 As well as negative impacts on water and carbon the degradation of these upland peatlands has a significant impact on biodiversity with a number of species that inhabit these areas amongst our most threatened. The curlew a once common and widespread species has declined by over 80% in Wales, and a key factor in their decline is the loss of breeding habitat including that degraded by poorly located forestry plantations.

⁴ A 1% loss of soil carbon per year could increase net Welsh Carbon Emissions by 10% - LUGCC (2010) *Land Use and Climate Change Report*. Welsh Government. Available at: <http://gov.wales/topics/environmentcountryside/farmingandcountryside/farming/land-use-climate-change-group/?lang=en>

9.3 As well as degrading habitat these plantations also contribute to another factor impacting on many upland breeding waders, by providing habitat for predators. In one area of North Wales RSPB Cymru, working with NRW Conservation staff and local landowners are attempting to reverse the fortunes of the local curlew population by improving the conditions for breeding. Whilst agreements have been put in place to achieve appropriate grazing and habitat management, the last piece of the puzzle is removal of inappropriately located shelter belts. These small conifer shelter belts, established through previous grant funding mechanisms, are limiting the success of breeding curlew by harbouring foxes and providing perches for corvids, leading to predation of eggs and chicks. RSPB working with local NRW staff have applied for a felling licence to remove some of the problem trees however consent was declined by NRW, due to the restriction to replant the trees if felled. This balancing of the need to maintain tree cover whilst helping restore biodiversity is a key challenge for the Welsh Government, and in this instance maintaining an aged stand of conifers, which have little commercial value due to the poor quality of the timber, has been prioritised over the need to restore a priority species and the peatland habitat on which the trees were planted.

10. The Well-being of Future Generations (Wales) Act 2015

10.1 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) Act⁵, we feel that delivery against the goals is currently falling short due to a lack of action to bring existing woodland into better management to benefit priority species and support for action to secure resilient ecosystems is lacking. 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.

11. Contribution to the Environment (Wales) Act 2016

11.1 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.

11.2 Ecosystem restoration is a significant part of the Ecosystem Approach (Principle 5 of the Convention on Biological Diversity, Ecosystem Approach Principles⁶) 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.

⁵ See pg9 of the [Summary](#).

⁶ 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>

12. Leaving the European Union

12.1 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.