Scotland's Forestry Strategy 2019-2029

Report on the consultation process undertaken

Scottish Government
Riaghaltas na h-Alba
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1. Introduction

1.1   Background

This Consultation Report accompanies Scotland's Forestry Strategy 2019-2029, presented to the Scottish Parliament by the Scottish Ministers on 5 February, 2019. It outlines how the views expressed about the draft strategy during the consultation process were taken into account in the final document which can be found online at: https://consult.gov.scot/forestry/scotlands-forestry-strategy-2019-29/

1.2   Purpose of this report

The production of a Forestry Strategy is a requirement of the Forestry and Land Management (Scotland) Act 2018 ('The Act'), which is due to commence on 1st April, 2019. The Act specifies what should be included in the strategy, the requirements for consultation on a draft strategy and for the production of a consultation report. The published strategy and this report have been produced to meet the requirements of the Act and will be laid before Parliament following the commencement of the Act.

The requirements for consultation and consultation reporting are set out in Sections 4 and 5 of the Act as follows:

4   Preparation and revision of forestry strategy

  (1) In preparing or revising the forestry strategy, the Scottish Ministers must—

   (a) publish a draft of the strategy and consult with such bodies as they consider appropriate and also with the general public.

5   Publication of forestry strategy

  (3) …the Scottish Ministers must also publish a report setting out—

   (a) the consultation process undertaken in order to comply with section 4(1)(a), and

   (b) the ways in which views expressed during that process have been taken account of in preparing or revising the forestry strategy.

(4) The Scottish Ministers must lay a copy of a report under subsection (3) before the Scottish Parliament.

This report sets out how the requirements outlined in Section 4(1)(a) have been met and fulfils the requirements for a report on the consultation process outlined in Section 5 (3). The statutory consultation, analysis and reporting have been conducted in accordance with the guidance set out in the Scottish Government's Consultations Good Practice Guide.

2. The Consultation Process

2.1   Stakeholder engagement during the preparation of the draft Strategy

During the preparation of the consultation draft of the strategy (Jun-Aug 2018), a number of structured discussions took place with a range of stakeholders including amongst others: the Confederation of Forest Industries (Confor), the Community Woodland Association, Forest Policy Group (FPG), the Royal Society for the Protection of Birds (RSPB), the UK Forest Products Association, Woodland Trust Scotland and the Central Scotland Green Network Trust. These discussions were used to explore the potential key themes and issues that a new strategy could consider and identify the opportunities (i.e. events) to engage a wider range of stakeholders in the consultation process.

2.2 Reference Group

A Reference Group was formed during this period to: feed into the development of the draft strategy; increase the effectiveness of the formal consultation process by supplementing and facilitating wider consultation and liaison activity associated with the strategy; and provide views on, and insight into the reaction of others during the consultation process. The group's members represented a wide range of interests and expertise in forestry and land use in Scotland and included individuals working in the private, public and third sectors. The group was chaired by the Director for Environment and Forestry of the Scottish Government. A list of the full membership

can be found at Annex 1. The Group met three times: i) prior to the consultation; ii) during the consultation period; and iii) after the consultation period had closed.

2.3   Stakeholder engagement during the consultation period

A 10-week public consultation on a draft strategy was held between 20 September 2018 and 29 November 2018.

Around 350 stakeholders were notified of the consultation via email, and publicity materials on the consultation were provided to Scottish Rural Action (the body which organises Scotland's Rural Parliament). There was also a Ministerial announcement and press release, which resulted in coverage by a number of national and regional newspapers.

The consultation was promoted via social media (Twitter), a blog piece on Forestry Commission Scotland's website and bespoke engagement events.

Many key stakeholders (including the Institute of Chartered Foresters, National Farmers Union Scotland, the Royal Scottish Forestry Society and Woodland Trust Scotland) either retweeted these posts, sharing them with their members, and/or promoted the consultation themselves via Twitter and other online channels.

During the consultation period, officials also arranged or participated in 18 meetings, workshops and events across Scotland, engaging with over 250 people, representing more than 120 organisations (Annex 2). This included a workshop focused on young people (land use professionals and students), hosted by the Minister for Rural Affairs and the Natural Environment. Officials also responded to contact from members of the public and other stakeholders.

In parallel with the statutory consultation process, on Scottish Government's behalf, Young Scot hosted an online survey on their Young Scot Rewards platform to help better understand young people's awareness of, and perspectives on forestry, as well as its benefits. 189 respondents from across Scotland took part in the survey, with ages ranging from 11 to 25.

2.4 Statutory consultation response and analysis

The consultation document contained 17 questions in total. These focused on the vision, objectives, priorities and policies set out in the draft strategy, as well as on the contents of the associated impact assessments (Strategic Environmental Assessment (SEA) Environment Report, Equality Impact Assessment and Business and Regulatory Impact Assessment).

There were 442 responses to the consultation. 102 (23%) of these were from organisations, including membership representative bodies, businesses, campaign groups, charities, public sector bodies and research institutions. The remaining 340 (77%) responses were submitted by individuals – 216 of these (49% of the total number of responses) were identical and generated as part of a campaign led by Woodland Trust Scotland.

Analysis of the responses was carried out by an independent consultant – 'The Lines Between' – and is available at: https://consult.gov.scot/forestry/scotlands-forestry-strategy-2019-29/

In compliance with the Environmental Assessment (Scotland) Act 2005, following the adoption of Scotland's Forestry Strategy 2019-2029, it is a requirement that a SEA Post Adoption Statement be prepared. This sets out how the findings of the SEA Environmental Report and related consultation respondents' comments have been taken into account in the finalisation of the strategy. This will also be available in due course.

3. How the views expressed were taken into account

Following the public consultation, we have revised the draft strategy, taking into account the views expressed, as well as updating the strategy to reflect developments since the draft was published. A breakdown of the issues raised and how they were addressed is provided below.

3.1   General feedback

There was general support for the draft strategy and its contents, with only one section (Priorities for action) receiving more negative (52%) than supportive comments (48%). However, there were also numerous and often conflicting requests for changes to be made to the detail, structure and presentation of the document. The areas with the greatest consistency in responses asking for change are described below.

Many respondents asked for **more detail** to be provided throughout the document. We have responded by making additions in specific areas to provide better clarity. In particular, greater detail on the rationale for the inclusion of specific priority areas and the types of activity that will be undertaken within them has been provided, Additions have also been made in relation to implementation and delivery, as outlined below in section 3.6.

There were numerous, varied calls for changes to the **presentation** of the document to improve clarity, including an improved explanation of the linkages between the vision, objectives, issues and priorities. This has been addressed through redrafting, in particular of sections four and five, focusing on strategic drivers in section four rather than the more vague "major issues", and replacing the tables in section five with clearer text on priorities for action to improve clarity and logic flow.

Similarly, there were frequent calls for greater demonstration of **ranking** of objectives, issues and priorities – but no consensus on what that ranking should be. We have not introduced ranking, in recognition of the interdependencies of the three components of sustainable forest management (SFM) – economy, environment and society – to ensure that the strategy is balanced and remains relevant throughout its 10-year lifespan, with enough flexibility to adapt to changing circumstances.

3.2   Woodland Trust Scotland campaign response

As noted above, almost half of all responses were identical and were generated via a campaign orchestrated by Woodland Trust Scotland. These responses called for the strategy to provide clear plans of action, with ambitious targets that are monitored and regularly reported on in relation to the following: native woodland creation;

improving the condition of existing native woods; and the protection of ancient woodlands.

Within Scotland's Biodiversity Strategy, the government has already committed to, and set targets for native woodland creation and improvements in native woodland condition. These targets were previously set out in the draft strategy in section 3 on the vision and objectives. To give them more profile they are now detailed in the introduction (section 1). In addition, the sections of the strategy dealing with strategic drivers and priority areas for action now include explicit references to: preventing ancient woodland losses; supporting the creation of native woodlands, protecting woods and forests from the risks posed by invasive non-native species, deer and other herbivores; and improving the ecological condition of native forests and woodlands, including plantations on ancient woodland sites.

3.3   Thematic analysis

Due to the diversity in responses received to the consultation and the resultant difficulties in identifying consistent messages, thematic analysis of responses was carried out, grouping the content of responses around the three components of sustainable forest management (economy, environment and society) to see if this might provide any more insight.

The overarching commonalities that were identified through this analysis have been dealt with in sections 3.1 and 3.6 of this report but the thematic analysis also highlighted some theme-specific messages.

A common theme among those discussing **economic** concerns was a request for greater recognition of the need for improvements to rural infrastructure to support the sustainable transportation of timber. This has now been covered in both the strategic drivers section, as well as within the priority areas for action (priority 3).

For respondents that commented on the **environment**, there were frequent calls for the strategy to include a greater focus on biodiversity. To address this, greater prominence has been given to biodiversity throughout the document, particularly within the section on the contribution of Scotland's forests and woodlands, and within

the priorities for action section, where a number of biodiversity-related activities are listed under priorities 4 and 5.

Responses that discussed **social** issues commonly asked for more comprehensive consideration of small-scale forestry. As such, the new priorities for action make it clear that the creation of a range of types and scales of new forests and woodlands will be supported and that, likewise, businesses of different types and scales will be supported to develop and grow markets.

Another call made in responses that discussed social issues was to raise the profile of the value of forests and woodlands in mitigating the impacts of climate change for the benefit of current *and* future generations. This has been addressed in the drivers and priorities sections, with greater emphasis being given to the adaptability and resilience of Scotland's woodlands and forests.

Responses from both those with an environment focus and those with a more social focus, also called for more emphasis on the application of integrated approaches to land management. Redrafting has strengthened the profile of integration throughout the document and in particular the 50-year vision now includes explicit reference to the integration of forestry with other land uses.

3.4   Vision and objectives section

The majority of respondents agreed with the draft strategy's vision (64% of those that responded to the question) and felt that the objectives set out in the draft strategy were the right ones (60% of those that responded to the question). There were no consistent messages regarding requests for revisions to either the vision or objectives, and instead comments tended to focus on giving greater emphasis to a particular issue or area of sustainable forest management, or requested a level of detail not appropriate for a strategic vision and objectives (although a level of detail which has frequently been included at a later stage in the document e.g. in the priorities for action section or the section on delivery, monitoring and reporting). The vision has therefore been refined, and the objectives have been re-drafted to improve their clarity and ensure they are measurable (which was an issue raised by some respondents).

3.5 "Major issues" section

Just over half of respondents agreed with our assessment of the major issues within the draft strategy (54% of those that responded to the question). While not a particularly strong theme, some respondents described the presentation of the issues as confusing. To address this we have reframed this section of the document, clarifying its purpose and focusing on strategic drivers rather than 'issues'. This better reflects its content and improves the logic flow of the document.

There were numerous and wide-ranging requests for additional issues to be included in this section but, in considering these with reference to the reframing of the section, the majority of these were not considered to be *strategic* drivers. However, where appropriate, other specific comments have been incorporated into the text.

3.6 Priorities for action and policies for delivery section

Just under half of respondents felt that the ten priorities identified in the draft strategy captured the areas where action is most needed to deliver the objectives and vision of the strategy (48% of those that responded to the question). However, those that responded negatively frequently described aspects of presentation, structure or discussion that they were dissatisfied with, as opposed to finding fault with the priorities themselves. There was also a sense that the priorities were not sufficiently well linked to the vision, objectives and issues, and that they were not sufficiently quantifiable to be able to measure progress.

To improve clarity, the priorities section has therefore been redrafted. The information included previously is now presented in a different way and the tables have been removed. The number of priorities has been reduced from ten to six and these are higher-level, broader and more strategic than previously. This approach allows the priorities to be more cross-cutting across the three key objectives, which better reflects the principles and the multi-purpose nature of sustainable forestry.

While the number of priorities has reduced from ten to six, more explanatory detail has been provided below each priority. For example, an improved rationale has been included for each priority area for action to strengthen the linkages with other sections of the strategy, enhancing the overall logic flow. In addition, information on

the types of activity that will be undertaken within the priority action areas has also been provided. The new priorities have also been drafted in such a way as to improve their measurability.

A consistent message in responses was a call for greater detail to be provided on how the strategy will be implemented and delivered. There were also calls for a commitment to be made to engaging with stakeholders in the development of plans for implementation and a monitoring and reporting framework.

To address these requests, delivery, monitoring and reporting is now covered in a distinct section of its own in the strategy. This section provides greater clarity on the delivery, monitoring and reporting process and the role of government and other stakeholders within it.

Respondents shared numerous examples of effective delivery mechanisms and suggested several indicators which could be included in a monitoring framework. These suggestions will be considered during the delivery phases, after the strategy has been published and then laid before Parliament.

3.7 Impact Assessments

Equality Impact Assessment

Feedback on the Equality Impact Assessment suggested that diversity should be considered in a wider sense within the strategy, covering forestry and woodland users as well as those working within the sector. To address this, explicit reference to both attracting diverse talent to the forestry sector, as well as to encouraging a more diverse range of people to value and use forests and woodlands have been included within the priorities section.

Business and Regulatory Impact Assessment

Feedback on the Business and Regulatory Impact Assessment suggested respondents would have liked a wider range of organisations to have been consulted during its creation. However, there was little insight provided into how respondents felt this would have changed the conclusions reached and there were no consistent calls for changes to be made to the assessment or associated changes to be made to the strategy.

Strategic Environmental Assessment

Respondents were asked five questions in relation to the Strategic Environmental Assessment (SEA) Environmental Report. The questions were developed to seek views on the evidence used in the assessment process to determine the likely environmental effects and if the predicted effects, as set out in the Environmental Report, were felt to be accurate.

The majority of respondents that commented on the evidence were positive about it (55%) and just over half of respondents agreed with the conclusions and recommendations set out in the Environmental Report (54% of those that responded to the yes/no question). Comments offered on them were wide ranging, with little consensus.

A SEA Post Adoption Statement will set out how comments received on the Environmental Report have been taken into consideration in the finalisation of the strategy.

3.8 Young people

As mentioned previously, in addition to the statutory consultation a separate survey was carried out with young people. In due course the findings of this survey will be made available https://consult.gov.scot/forestry/scotlands-forestry-strategy-2019-29/. One particularly strong finding from this survey was that respondents felt that a crucial current benefit of forests was their contribution to reducing climate change (ranked 2 out of 14 benefits) and that this will grow in importance over the next 50 years (to be the most important benefit out of 14). This has been addressed in the final strategy by improving the profile of climate change mitigation and adaptation throughout the document, including within the priorities for action. The benefit identified as the most important currently and ranked second in importance in 50 years was the provision of habitats for wildlife. The priorities section of the strategy now makes a specific commitment to safeguarding priority habitats and species.

4. Further details

For more information on this report or any aspect on Scotland's Forestry Strategy 2019-2029, please contact:

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Membership of Forestry Strategy Reference Group

Individual	Organisation
Professor Bill Slee	James Hutton Institute
Bridget Campbell (Chair)	Scottish Government
Charles Dundas	Scottish Environment LINK
Professor Chris Quine	Forest Research
David Sulman	United Kingdom Forest Products Association and South of Scotland Economic Partnership
Francesca Osowska	Scottish Natural Heritage
Professor Jaboury Ghazoul	University of Edinburgh
Jo O'Hara	Forestry Commission Scotland
Jon Hollingdale	Community Woodlands Association
Jonnie Hall	National Farmers Union Scotland
Katriona Carmichael	Scottish Government
Keith Connal	Scottish Government
Martin Gale	Scottish Forest and Timber Technologies Industry Leadership Group
Richard Cooke	Association of Deer Management Groups
Sarah-Jane Laing	Scottish Land and Estates
Shireen Chambers	Institute of Chartered Foresters
Simon Rennie	Central Scotland Green Network Trust
Stuart Goodall	Confederation of Forest Industries
Terry A'Hearn	Scottish Environmental Protection Agency
Trefor Owen	Forest Enterprise Scotland

Organisations that attended consultation events

Organisation
A. Douglas Consultancy
Aberdeenshire Council
Agribusiness and Barclays Bank plc
Agriculture & Recreation Consultant
Alan Motion Tree Consulting Ltd
Alba Trees plc
Anderson Strathern
Angus Biofuels
Argyll & Bute Council
Argyll Timber Transport Group
Association of Deer Management Groups
Ayrshire & South Lanarkshire Timber Transport Group
Barony College
BDW Trading Limited
Bidwells
Borders and Dumfries and Galloway Timber Transport Groups
British Association for Shooting and Conservation
Buccleuch Estates Ltd
Burns Burns & Burns
Cairngorms National Park Authority
Caledonian Trust
Camping in the Forest
Caorann Ecological Consultancy
Central Scotland Green Network Trust
Charlotte Street Partners
Christies Elite Nurseries
CM Resource Consultancy Ltd and LFI Silva Investments Ltd
Coigach Assynt Living Landscape
Community Woodlands Association
Confederation of Forest Industries
Dairy UK
Davidson & Roberston Rural
Dundee University
Dupplin Estate
Eamonn Wall & Co
Edinburgh & Lothians Greenspace Trust

Organisation
Edinburgh International Science Festival
Ferguson Transport
Forest Machine Magazine
Forest Policy Group
Forest Research
Forestry Contractors Association
Foulis Estate
Galbraith Group
Game and Wildlife Conservation Trust
Glasgow City Council
Glennon Bros
Glenside Group
GR Forestry
Grampian and Stirling & Tayside Timber Transport Groups
Grosvenor Estates
Heritage Lottery Fund
Highland Council
Highland Timber Transport Group
Highlands & Islands Agricultural Support Group
Historic Environment Scotland
Institute of Auctioneers
Institute of Chartered Foresters
Ironbridge Capital Partners LLP
James Hutton Institute
John Clegg & Co
John Muir Trust
John Scott Transport
Jones Lang LaSalle
Kingdom Farming
Kingdom Forestry
Knight Frank
Kronospan
Lantra Scotland
Law Society of Scotland
Loch Lomond & Trossachs National Park
Mark Hamilton Landscape Services
Mountaineering Scotland
MSFLM
National Access Forum
National Farmers Union Scotland
National Sheep Association

Organisation
National Trust for Scotland
Oberlanders Architects
Quality Meat Scotland
Reforesting Scotland
Rettie & Co.
Road Haulage Association
Rosebery Estates
Royal Institute of Chartered Surveyors
Royal Scottish Forestry Society
RPS Group
RSPB
Rural Mental Health Forum
Savills
Scottish & Southern Energy Networks
Scottish Association for Country Sports
Scottish Association of Meat Wholesalers
Scottish Association of Young Farmers
Scottish Beef Association
Scottish Borders Council
Scottish Enterprise
Scottish Environment Link
Scottish Environment Protection Agency
Scottish Forest & Timber Technologies Industry Leadership Group
Scottish Government
Scottish Land and Estates
Scottish Natural Heritage
Scottish Raptor Study Groups
Scottish Water
Scottish Wildlife Trusts
Scottish Woodlands Ltd
Selvana Ltd
Soil Association Scotland
South Scotland Regional Forestry Forum
SRUC
Statkraft
Tilhill Forestry Ltd
Transport Scotland
Trees for Life
Turcan Connell
University of the Highlands & Islands

Organisation
United Kingdom Forest Products Association
University of Edinburgh
West Lothian Council
Wood Panel Industries Federation
Woodland Trust Scotland
WSP Group plc