



## **RESPONSE TO: Consultation on green paper on Forest Protection and Information in the EU: preparing forests for climate change**

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The Woodland Trust welcomes the opportunity to respond to this consultation. The Trust is the UK's leading woodland conservation charity. We have three aims: to enable the creation of more native woods and places rich in trees; to protect native woods, trees and their wildlife for the future; to inspire everyone to enjoy and value woods and trees. We own over 1,000 sites and have more than 300,000 members and supporters.

We believe that any forestry policy should aim to achieve

- Absolute protection for all old growth forests from destruction and degradation resulting from direct human impacts
- No net loss of all forest area, including plantations
- Sustainable management of all forests is certified in line with Forest Stewardship Council (FSC) principles
- All international trade in forest products is certified in line with FSC principles, i.e. international trade in unsustainably produced timber is made illegal
- A simple long term financial solution to make the retention of forests more worthwhile than their destruction or irreversible damage

### **Summary**

**The Woodland Trust believes that the EU has a critical part to play in ensuring a future for functioning forest ecosystems across Europe.**

**Key issues include:**

- **The need to develop a single land use policy that incorporates agriculture, forestry and environment alongside other considerations**
- **The need to bring forestry management within the Guidance on Agricultural and Environmental Conditions for all grant aided schemes including compliance monitoring**
- **The need to include forestry within the delivery of all environmental directives of the EU eg Water Framework Directive**
- **The need to develop an EU wide monitoring strategy that measures all assets and impacts of forestry not just productivity**

**The Woodland Trust believes that the role of the EU is vital if the current limited, vulnerable and fragmented state of UK forestry is to be redressed and a flourishing, vibrant asset develop.**



### **The state of Forests – Forest functions**

The definition of forest and wooded landscapes varies across Europe and across EU and member state policy documents and data collection methodologies. A standardised approach would simplify the confusion in terminology.

In the UK the definition of forest includes areas or stands with a crown cover of 20% compared with the definition in this document of 10% crown cover. These lower ends of crown cover encompass many agroforestry (silvopastoral and silvoarable) systems, however, there is no recognition in this document of the wider cultural, landscape, biodiversity and sustainability role of these traditional and ultramodern (eg alley or hedgerow intercropping systems) wooded landscapes.

#### **Question 1:**

**Do you think maintaining, balancing and enhancing forest functions should be given more attention? If so, on what level should action be taken, EU, national and/or other? How should it be done?**

We would wish to see a more integrated land use policy that views forests and trees as an integral part of all landscapes and thus an integral part of policy and strategy decision making.

The UK is atypical in respect of forest cover when compared with other Member States within the EU. The UK has a limited and fragmented woodland resource of just 11.7%, compared to an average of 37% for the EU.

However, as with other MS, the UK has an important history of silvo-pastoral systems. At present there is no UK inventory of wood pasture and parkland although many of these areas would qualify as 'forests' or other wooded land. Across the EU many traditional agro-forestry landscapes have been in decline for many years as a result of changing agricultural practices and support mechanisms. With the segregation and intensification of forestry and agriculture, these traditional agro-forestry systems are undervalued and lost.

We believe forestry and other wooded land can play a vital role in providing goods and services, thereby securing a better future for the EU. This includes the role of trees and woods in: helping society mitigate carbon emissions and adapt to climate change; water management; supporting productive agriculture; producing woodfuel and timber; conserving biodiversity and providing public access to woodland.

To achieve this aim there is a requirement for an integrated land use policy. Whilst Member States have a leading role to play in the maintenance of sustainable forest functions, the EU already manages a number of strategies that can be used to achieve best practice and with which forest policy and practice should be more closely aligned. Furthermore, the Water Framework Directive, Common Agricultural Policy, Nitrates Directive, Flood Directive and Habitats Directive; should be



making more use of forestry to deliver their aims. If there were greater coherence and more attention to delivery of enhanced forest function in these directives and policies at an EU level there would be a filtering down of benefits at a national level.

A key target of the EU Water Framework Directive is for rivers to achieve good ecological and chemical status by 2015. 93 per cent of rivers in England and Wales at risk of failing to achieve this standard. The two most important threats are diffuse pollution and physical changes, often associated with agriculture and urban development. The main sources of diffuse pollution responsible for at-risk water bodies are: sediment delivery (21 per cent), pesticides (21 per cent), phosphorus (47 per cent) and nitrate (38 per cent). Some 48 per cent of rivers are also at risk from physical degradation of river channels and banks.

New native woodland creation has the potential to reduce pressures by protecting soils and riverbanks, reducing rapid surface run-off and intercepting pollutants before they reach watercourses. Although this is scale-dependent, benefits could be maximised by targeting high risk soils and careful placement of woodland to intercept pollutant pathways.

Achievement of many of the aims of EU directives would be enabled by the establishment of an integrated land use policy which would seek to bring together forestry, agriculture and other environmental designations under one umbrella so that similar conditions and opportunities were applicable to all. Please see comments later in response to question 4.

**Question 2:**

- **To what extent are EU forests and the forest sector ready to address the nature and magnitude of the challenges posed by climate change?**
- **Do you consider particular regions, certain countries more exposed/vulnerable to the effects of climate change? What sources of information would you base your answer on?**
- **Would you see a need for EU-level early action to ensure all forest functions are maintained?**
- **How could the EU contribute to add value to the respective efforts of MS?**

A resilient natural environment is a pre-requisite for sustainable adaptation; creating healthy, functioning ecosystems is fundamental to wider adaptation. For instance, land management practices should seek to improve water quality and reduce flood risk, reduce emission of greenhouse gases, increase stored carbon in soils and support the targets for biodiversity conservation.

The UK is one of the least wooded countries in Europe with only 11.7 per cent woodland cover, as compared to a European average of 44 per cent<sup>0</sup>. Most of the 2.8million hectares of woodland in the UK is comprised of non-native conifer plantations<sup>1</sup>. Around 1million hectares is estimated to be



native woodland; 37 per cent of total woodland cover or 4 per cent of the UK's land area<sup>ii</sup>. In addition, about 123 million trees survive outside woodland in GB<sup>iii</sup>, although isolated open-grown hedgerow trees (i.e. whose canopies do not touch) have declined in number over recent decades, e.g. by around 37 per cent between 1980-1998.

Ancient woodland in the UK is home to twice as many species of conservation concern as any other habitat<sup>iv</sup>. Unfortunately, many are characterised by poor powers of dispersal and are associated with ancient woodland and ancient hedges simply due to their continuity. Others species may have specific habitat requirements that take a long time to develop, for example some of the species confined to old-growth sites; individual trees in the wider landscape can be all that remains of such sites.

The vulnerability and fragmentation of the resource is made worse by the intensity of the intervening land use. 23% of GB's land area is arable and horticulture, 25% is improved grassland, and more than 5% is built-up. Woods are at the mercy of damaging activities on adjacent land, including pesticide drift, fertiliser overspread, air pollution and disturbance<sup>v</sup>. Small or narrow woods are particularly at risk, as are hedges and trees outside of woods.

Climate resilience models have suggested planting rates of 20,000ha a year or more may be necessary.<sup>vi</sup> However, planting rates in the UK have fallen by more than half in the last six years from 11,900ha in 2005 to 5,000 ha in 2010 and are now lower than at any time since the mid 1970s. To reach the desired targets for woodland creation will require a fundamental shift in outlook about the role and place of forestry and other wooded land within the landscape.

The UK and other poorly wooded countries are less able to take advantage of the many benefits that woodland creation offers in terms of both mitigation and adaptation and will need considerable support in order to achieve a wooded landscape that is climate resilient.

The England Biodiversity Strategy's Climate Change Adaptation Principles are aimed at all land and resource use sectors and includes the need to:

- Conserve protected areas and all other high quality habitats; these areas will remain important because they have characteristics that will continue to favour biodiversity
- Reduce sources of harm not linked to climate change to help natural systems maintain their biodiversity in the face of climate change
- Maintain existing ecological networks; further habitat fragmentation and isolation should be avoided
- Create buffer zones around high quality habitats, e.g. reducing the occurrence of damaging activities in their immediate vicinity or by creating the same or complementary habitats adjacent



- Establish ecological networks through habitat restoration and creation; creating new habitat, restoring degraded habitat and sympathetically managing areas between existing habitats in the wider environment
- Take prompt action to control spread of invasive species known to cause significant habitat degradation or loss of other species where action can be sustained
- Aid gene flow; adaptability, which is correlated with diversity, should be an important driver for conservation in response to environmental change not local adaptation<sup>vii</sup>.

These aims cannot be achieved without coming into conflict, either real or perceived to be so by the land owner, with existing land use regulations. There is a role for the EU to play in enabling greater freedom to act, by streamlining land use policies and using existing directives to deliver an integrated land use policy which fully incorporates the forestry sector.

**Question 3:**

**- Do you consider that EU and MS policies are sufficient to ensure that the EU contributes to forest protection, including preparing forests for climate change and conserving biodiversity in forests?**

**- In what areas, if any, do you think further action may be necessary? How might this be organized, under the given policy framework or beyond?**

Both the EU and individual MS have a robust list of protection measures in place and aims for future woodland creation and management. However, if these aims are to provide any improvements on the ground then more work needs to be done to implement the existing legislation, policy and good practice by holding the legislative body to account.

For example, individual countries within the UK have high quality protection measures in place that could automatically protect all old growth forest and yet between 2001 and 2009 more than 200ha of ancient woodland was lost and over 26000ha threatened, representing some 5% of the overall resource. The UK Forestry Commission currently has no mechanism by which to measure loss of ancient woodland despite "no loss" being a biodiversity action plan commitment.

The individual UK legislative bodies have aspirational targets for woodland creation; for example Scotland where the Climate Change (Scotland) Act's Climate Change Delivery Plan (CCDP) explicitly links afforestation with Scottish Government emissions-reduction targets. On 21 April 2010, the Scottish Government confirmed its 2020 target to cut emissions by 42%, 'required measures' in the CCDP associated with this target include a 'Planting rate of around 15,000ha/year'. In fact 2009-2010 saw a total planting in Scotland of 2700ha and across the UK the annual rate of planting has been falling steadily and is now less than a third of ten years ago. The gap between what is happening on the ground and any of the country commitments is enormous.



There is a danger that national forestry organisations are moving from trees for fibre to trees for carbon and are not embracing the wider opportunities. For example, in the UK the Forestry Commission is reviewing the role of trees as part of a carbon reduction plan but not looking at the benefits of trees outside woods or upland regeneration from agricultural perspectives. Trees outside woods with closed canopies are an important resource for wood fuel and other products and contribute significantly to climate change mitigation in agricultural and urban landscapes.

Many traditional agro-forestry landscapes have until recently provided a significant supply of local wood fuel. Sadly this practice is in decline across the EU and is only active now in a very few localities. In parts of Portugal it is being re-activated where other fuel supplies (electricity and gas) are becoming too expensive and rural inhabitants are returning to traditional wood fuel sources.

These agro-forestry systems have very important economic benefits beyond wood-fuel production. There is research that demonstrates that productivity in these systems is greater than in conventional agricultural systems<sup>viii</sup> and proven to be sustainable over millennia. The valuation of non marketed 'forest' or wooded landscape products is very important in this context. The EU has a role to play in recognising these eco-systems and incentivising their management to ensure their future.

Our experience suggests the complexity of grant applications inhibits woodland creation. Recent work by Forest Research on landowners' past attitudes to woodland creation has highlighted lack of suitable advice as a barrier. There is a need to find out what would motivate people to create woodland in the current climate. Historic trends in planting rates suggest money is the key driver, raising the grant rate by 30% in Northern Ireland resulted in a 70% increase in applications<sup>ix</sup>. This finance can support landowners in the delivery of environmental and social objectives. Moreover, research into the uptake of agri-environment schemes has shown that whilst money is frequently cited as the reason for not entering schemes or only entering at the lowest level, targeted advice can easily overcome that barrier.

Whilst historically in the UK forested land and agricultural land was owned and managed by the same people, in the latter half of the twentieth century the two ownerships were largely separated, a situation exacerbated by the management of the two land uses being handled by different government organisations using different criteria and grant regimes.

As mentioned above, we would wish to see a more integrated land use policy that views forests and other wooded land as an integral part of the rural landscape and thus an integral part of policy and strategy decision making.



**Question 4:**

**- How could the practical implementation of SFM be updated in order to upkeep the productive and protective functions of forests and overall viability of forestry, as well as enhance the resilience of EU forests in view of climate change and biodiversity loss?**

**- What steps are required to ensure that the gene pool in forest reproductive material can be successfully conserved in its diversity and adapted to climate change?**

The UK enjoys a generally high standard of professional forest management. The UK Woodland Assurance Standard – UKWAS – provides the benchmark for sustainable forest management<sup>x</sup>. Although a voluntary standard, UKWAS is widely adopted in the forest industry, and forms the basis for certification through the Forestry Stewardship Council (FSC) and the Programme for the Endorsement of Forest Certification Programmes (PEFC).

For those areas of forest which are not within a certification scheme the only means within the UK of ensuring the achievement of sustainable management is the UK Forestry Standard. There is little information on how, or even if, compliance with the standards are monitored and no auditing regime is in place.

We believe that the standards which define sustainable forest management should be integrated into the Guidance on Agricultural and Environmental Conditions that form part of the cross compliance procedure for all EU agricultural schemes and that GAEC should be the umbrella designation from which all standards are developed. Adherence to these conditions should be mandatory for any grant aided scheme.

The alignment of cross compliance standards would result in a single, easily understandable scheme that would remove some of the barriers to woodland creation experienced by land owners and managers more familiar with the agricultural system. This would also result in more effective monitoring and enforcement.

There is growing evidence that the balance between differently adapted populations of trees in contrasting local environments and reproductive contact through long distance movement of pollen maintains genetic diversity and adaptability in tree species at a European scale. The planting of native trees of non-local provenance should, therefore, pose little risk to existing tree populations locally, particularly as it is likely to only form a small proportion of the total resource.

The idea of promoting use of wider provenances from the perspective that the genetic diversity of trees plays a key role in maintaining the resilience of woodland ecosystems has been suggested by



a pan-European meeting in relation to a resolution by the MCPFE on climate change and sustainable forest management in Europe. It called for development of pan-European guidelines for the transfer of forest reproductive material in Europe on the basis of scientific knowledge in order to accelerate the adaptation of trees to climate change.

The Woodland Trust believes that, whilst knowledge continues to grow, there is a need to adopt a precautionary approach. Climate change presents a severe threat to the future viability of forestry in the EU. It is vital that, in our efforts to try and ensure that the rate of environmental change allows the widest biodiversity to adapt and evolve, we do not inadvertently reinforce genetic restrictions on species capacity to respond.

A less stringent approach is needed than the current complex and arbitrary rules around planting trees of local provenance. In the UK there is a need to expand upon the Forestry Commission's Voluntary Scheme for the Certification of Native Trees and Shrubs and associated incentives. Faced with uncertainty, it seems prudent to continue to plant trees of local provenance but supplemented by trees of other provenances from a range of seed sources. There is little value in attempting to select provenance on the basis of climate change projections, particularly at a regional scale.

From a genetic standpoint, regardless of other considerations, the debate over whether woodland creation is best achieved through natural regeneration or tree planting is of little consequence, given rapid environmental change. However, genetic conservation does not provide evidence to support the planting of non-native trees in ancient and native woods. Such action may increase the rate of environmental change and compound pressures on woodland ecosystems rather than enhance their resilience.

**Question 5:**

**Taking into account the various relevant policy levels, is available forest information today sufficient to assess with sufficient accuracy and consistency:**

- **The health and condition of EU forests?**
- **Their productive potential?**
- **Their carbon balance?**
- **Their protective functions (soils, water, weather regulation, biodiversity)?**
- **The provision of services to society and their social function?**
- **Overall viability of forestry?**

**If it is insufficient, how should forest information be improved?**

**Are efforts towards harmonised data collection on forests sufficient?**

**What can the EU do to further develop and / or enhance forest information systems?**

We welcome the lead set by the European National Forest Inventory Network and the move made by MS to align their data collection and monitoring systems with the network. However, we feel



that there are a number of areas where more data is needed, or data collection could be better targeted.

The health and condition analysis of EU forests tends to report on the internal issues that relate to that forest when many of the drivers of change operate at a landscape level. There should be emphasis placed on collecting information on external factors to compliment the forest data.

Sufficient data is collected on the productive potential of commercially managed forests, however, this data collection has not fully realised the requirements in terms of renewable energy. There appears insufficient information gathered on the extent of the biomass resource within the EU which has impacts on the ability to develop operational supply chain frameworks or assess realistic renewable energy targets and standards. The productive potential of agro-forestry systems does not appear to have been collected or collated.

Whilst carbon balance estimates for forests have been widely undertaken from the information provided, less information appears to have been collected or analysed about soil carbon in forests which is at least as important.

The Woodland Trust, Autumn Park, Grantham, LINCOLNSHIRE NG31 6LL

[www.woodland-trust.org.uk/campaigns](http://www.woodland-trust.org.uk/campaigns)

[www.woodsunderthreat.info](http://www.woodsunderthreat.info)

**For more information, please contact:**

**Frances Winder email: [franceswinder@woodland-trust.org.uk](mailto:franceswinder@woodland-trust.org.uk) or tel: 01476581111**



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- <sup>i</sup> **Forestry Commission (2009)** Forestry statistics. Environment: ancient semi-natural woodland. <http://www.forestry.gov.uk/statistics>
- <sup>ii</sup> **UK native woodland Habitat Action Plans (2006)** [www.ukbap.org.uk](http://www.ukbap.org.uk)
- <sup>iii</sup> **Forestry Commission (2003)** National Inventory of Woodlands and Trees. Great Britain. Forestry Commission, Edinburgh. <http://www.forestry.gov.uk/inventory>
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- <sup>ix</sup> **Northern Ireland Assembly** - written answers 4 June 2010 (AQO 1327/10)
- <sup>x</sup> <http://www.ukwas.org.uk/>