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4 March 2020 *By e-mail*

Dear Ms Finch-Saunders,

Petition 05-945: The Climate Emergency and a National Forest for Wales

May I thank you for considering this petition and for the opportunity to comment on the Minister's letter. Our comments below respond to the topics covered in each paragraph of that letter. We welcome the general direction and scope indicated in the Minister's summary of the Welsh Government's tree, woodland and forestry programmes.

We are particularly interested in opportunities to explore the "step change" that the Minister mentions, and the ambition and scale of achievement that could be possible, given the Government's declaration of a climate emergency and recognition of biodiversity decline. Our view on what is needed of Government and local authorities are summarised in our Emergency Tree Plan¹, published in January this year.

Sustainable forestry (paragraphs 2 and 3)

We welcome the Welsh Government's commitment to sustainable forestry, and in particular the strong commitment to maintain independent certification of the Government's forest estate through the UK Woodland Assurance Scheme (UKWAS)².

- i) We would be interested to hear any thoughts the Minister has on the development of the UK Forest Standard (UKFS)³ given that:-
 - a. The Welsh Government's own monitoring shows that only 20% of private forestry in Wales is "known to be managed" to the UK Forest Standard. The remainder is not subject to any audit process.⁴
 - b. UKFS is a UK wide standard that does not directly embed the SMNR principles or ambition of Welsh policy and legislation.

Planting targets (Paragraph 4)

We welcome the clear commitment to challenging interim planting targets, and the recent increases in planting achieved under the Glastir Woodland Creation Scheme.

¹ Woodland Trust (2020) Emergency Tree Plan.

<https://www.woodlandtrust.org.uk/publications/2020/01/emergency-tree-plan/>

² UKWAS. UK Woodland Assurance Scheme. <http://ukwas.org.uk/>

³ UKFS UK Forest Standard. . <https://www.gov.uk/government/publications/the-uk-forestry-standard>

⁴ Welsh Government (2019). Woodlands for Wales Indicators 2017-2018. Chapter 3 Sustainable Forest Management <https://gov.wales/woodlands-wales-indicators>

- i) We understand that applications from landowners to this scheme have greatly exceeded the available budget. Can the Minister confirm the extent of un-funded applications received, and the proportion of these applications that is of sufficient standard to be suitable for funding?
- ii) How will the Minister significantly increase resourcing for green infrastructure and tree planting to meet the urgency and scale of the climate emergency?

National Forest for Wales (Paragraph 5)

We greatly welcome the Wales National Forest programme and look forward to more details being announced by the First Minister. Coed Cadw is hosting an event with the First Minister at Brynau in Neath on the 12th of March. We summarised our aspirations for a new Wales National Forest in our submission to the inquiry by the Climate Change, Environment and Rural Affairs Committee in December.⁵ An extract of our submission is attached.

Step change in land use (Paragraph 6)

We absolutely agree with the Minister's comment that tree planting is a long term aspiration and requires a step change in land use. We note the recent advice from the Committee for Climate Change that forest cover should be increased across the UK from an average of 13% to an average of 19% by 2050.⁶

- i) We would like to ask what progress Welsh Government is making with developing a long term plan to achieve such a significant change in land use.
- ii) What plans does the Welsh Government have to resource such a step change and help landowners significantly increase tree cover?
- iii) What does the Minister need from the farming, forestry and biodiversity sectors to make sufficiently rapid progress?
- iv) What improvements does the Minister think are needed in the quality, breadth and availability of advisory expertise able to support increases in tree cover in a wide range of different circumstances and for different needs?

Timber production (Paragraph 7)

We support the aspiration to increase the proportion of quality timber grown in Wales, and retaining its added value within Wales.

- i) What plan does the Welsh Government have to increase the resilience and future-proofing of the forest industry and diversify away from the current high volume / low value business model, dependent on a few softwood species and on highly centralised high volume processing?
- ii) What role will the Welsh Government forest estate play in leading this diversification?

Habitats, landscape, water quality and flood mitigation (Paragraphs 8 and 9)

We welcome the Minister's emphasis on the need for woodland to deliver these other substantive benefits and to contribute to reversing biodiversity decline. We point out that the design and composition of plantations intended for commercial timber production, and their management by clear-felling, severely compromises the delivery of the "public goods" benefits such as biodiversity and water management. Our view is that other methods of increasing tree cover better meet these objectives, in particular agroforestry, urban tree planting and the use of

⁵ Woodland Trust (2019) submission to CCERA inquiry on the National Development Framework.

⁶ Committee on Climate Change (2020). Land use policies for a net zero UK. 123 pp

<https://www.theccc.org.uk/publication/land-use-policies-for-a-net-zero-uk/>

natural regeneration of native species. Our provisional analysis of the potential of these approaches is attached.

- i) What approach does the Minister propose to ensure that public funding for woodland creation is directed to the effective delivery of these “public goods”?
- ii) What emphasis will the Minister be making for the case for agroforestry? We believe that additional hedge, shelterbelt and riparian planting on farms can meet up to a third of the woodland expansion target and deliver many public and farm business benefits. Our guidance note on agroforestry and flooding is attached.⁷
- iii) Will the Minister ensure that NRW reviews flood management strategies to fully develop the potential of nature based solutions to water management?
- iv) NRW has reported that 159 out of our 220 towns in Wales have shown a decline in tree canopy cover between 2009 and 2013, including losing large amenity trees at a rate of 1000 trees per year.⁸ What proposals does the Minister have to ensure that local authorities reverse the current declines in urban tree cover?

Community Woodlands (Paragraph 10)

We welcome the Welsh Government’s commitment to supporting community engagement in woodland and we look forward to a substantial stakeholder engagement process around the creation of the new National Forest. Given the significance of the land use change envisaged we suggest that it is vital that the farming community and the public are supportive.

- i) What approaches to consultation on the location and design of new forest creation is the Minister considering, to avoid the damage done by previous episodes of afforestation and to ensure a strong “social licence” for woodland expansion?
- ii) What analysis is available to the Minister of the economic and community enterprise opportunities arising from substantial woodland expansion, for example in meeting needs for fencing and the potential for community tree nurseries?

Carbon Sequestration and Storage

The Minister does not mention carbon sequestration and storage in her letter. The climate change mitigation potential of additional woodland creation is the main driver for calls to significantly increase tree cover and this is recognised in the Welsh Government’s Low Carbon Wales plan.

There are many complexities involved in establishing the true capacity of trees and woodland to sequester carbon as they grow and to lock carbon into long term storage.

- i) We would like to ask the Minister what analysis the Government has available on the contributions to these goals available from different sorts and uses of woodland and different approaches to increasing tree cover? We would question assumptions that standard plantation creation designed for timber production is the best means of securely locking up atmospheric carbon.
- ii) What potential does the Minister see to drive the creation of a commercial carbon offset market to fund new woodland creation in Wales?
- iii) Will the Welsh Government produce carbon budgets for its own infrastructure projects, such as its roads programme and Cardiff Wales Airport?

⁷ Coed Cadw (2020) unpublished. Briefing note on Agroforestry and Flooding.

⁸ NRW (2016) Tree Cover in Wales Towns and Cities: Understanding canopy cover to better plan and manage our urban trees // Study Summary. <https://naturalresources.wales/media/679615/eng-urban-tree-summary-2016.pdf>

We greatly appreciate the opportunity to suggest these topics and look forward to the discussion. Please contact me or Jerry Langford should the Committee members require any further information on any of the issues raised.

Yours sincerely



Natalie Buttriss

Director of Wales

Cyfarwyddwraig Cymru

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1. Coed Cadw – comments to CCERA on Wales National Forest
2. Coed Cadw = Briefing note on Agroforestry and Flooding
3. Coed Cadw - Possible contribution to targets of different forms of new woodland creation