

Submission by Woodland Strategy Advisory Panel to NAW Environment and Sustainability Committee inquiry into the public forest estate in Wales

1. The Woodland Strategy Advisory Panel (WSAP) has 22 members whose interests and experience span most of the diverse roles of woodlands in Wales. We played a leading role in formulating *Woodlands for Wales*, the government's 50 year strategy for Welsh woodlands. Before the formation of Natural Resources Wales we advised Forestry Commission Wales but now report to the Forest Policy Team of Welsh Government.
2. The terms of reference of your inquiry do not reflect the breadth of knowledge and expertise of our members so we take this opportunity to express views related to your broad aim of assessing NRW's management of the public forest estate as well as responding to the four subjects you identify in the terms of reference.
3. Our response is therefore in two parts. Part 1 addresses the four topics in the terms of reference. Part 2 provides comments on other aspects of the management of the public woodland estate. We offer both comments and also some recommendations. The submission is a compilation of the views of members rather than an agreed position statement.

Part 1

Comments and recommendations on terms of reference.

**The commercial operations and focus of the NRW
Comments**

4. NRW's forestry objectives, management structure and ecosystems approach to decision making are unclear.
5. NRW is not achieving best value in its contracting. This is because procurement processes are complicated and are not transparent or consistent. Businesses have to retender with detailed risk assessments and method statements when they have already qualified for the Framework Contract. NRW requires them to repeatedly go through the pre-qualification questionnaire (PQQ) process for each contract award. In short there appears to be no recognition of previous experience of working for FCW.

Recommendations

6. NRW's objectives for commercial forestry should be clearly defined and delivery mechanisms explained. It should have a clear structure for the management of the WGWE and a senior officer with overall responsibility for woodlands. It should explain how it will implement an ecosystems approach in its decision making.
7. NRW should simplify its tendering process and if businesses qualify for a Framework Contract simplify contract awards within the Framework

**Delivery of business advice and support to the forestry sector in Wales
Comments**

8. Forest businesses are experiencing a poor and declining quality of service from NRW. There are complaints that local NRW staff have not renewed contacts with organisations who were partners with FCW.

9. Regarding business advice, none is being delivered; rather NRW is being given advice by the private sector (PS) but not acting on it. As NRW no longer employ Woodland Officers there is no mechanism for dispensing advice.
10. NRW are inflexible towards amendment of existing grant schemes e.g. in re-allocating under-spent budgets or to making changes in response to *Phytophthora ramorum* (PR). NRW seem to have given up on Better Woodlands for Wales (BWW), the grant scheme before Glastir, although it is by far the most active grant scheme in delivering activity on the ground.
11. One excellent example of collaborative working and support between the private sector three local authorities and NRW is with timber transport from Tywi Forest (largest in Wales) and use of WGWE forest roads to relieve pressure on fragile local highways and divert timber traffic away from vulnerable rural communities. There is potential to take similar initiatives elsewhere.
12. With respect to regulations there has been a change in enforcement policy with creation of NRW. It is now much more heavy handed and it is difficult to see where the "public interest" test has been applied as it was in the past when prosecutions were contemplated.
13. A real problem for the private sector is the lack of balance in how NRW regulate themselves and the private sector. It is not clear whether NRW even monitors for breaches in compliance within their own Forest Design Plans and certainly no sanctions are applied due to Crown immunity. Evidence of breaches by NRW is only anecdotal but non-compliance is strongly suspected by the private sector and there is no reporting by NRW. This breakdown in trust between the private sector and NRW is not good for the industry or NRW.

Recommendations

14. NRW must improve the ways it works with stakeholders paying particular attention to: accessibility of staff with forestry expertise; responses to phone calls and e-mails (speed and quality of response) and coverage of forestry on the NRW web site.
15. NRW should allow amendments to BWW and re-allocation of unspent funds.
16. NRW should continue to encourage the use of WGWE forest roads to ease impact of timber traffic on rural County roads and communities.
17. NRW should implement its objective of reducing, coordinating, streamlining and simplifying regulations affecting commercial forest businesses who should be consulted about proposed changes.
18. NRW must ensure it is being effectively self-regulated and not treated completely differently from the private sector as is currently the case.
19. NRW should apply the "public interest" test to potential prosecutions.
20. NRW needs to engage more effectively with the Private sector.

Management of disease outbreaks on the public forestry estate.

Comments

21. *Phytophthora ramorum* has been by far the most serious disease outbreak in Welsh woodlands for many years. Management by NRW is now freely admitted by those elements of NRW/WG not in self-denial as being, quote, a “disaster”. There has been a lack of any deliverable strategy over the last 2-3 years with FCW/NRW always trying to play “catch-up” and being beaten by the disease’s progress. NRW has lost credibility for managing the disease by failing to deal with 3000ha of diseased larch on the WGWE. This is a clear example of failure in self-regulation. In the light of this failure by NRW how can it have any credibility in enforcing Statutory Plant Health Notices (SPHN) in private woodlands?
22. The latest strategy of a two zone approach to dealing with the spread of the disease makes sense and can potentially adapt to development of the disease. However with no funding for the private sector to meet the costs of sanitation felling and with the risk of spore build up in the Core Disease Zone there is potential for the disease to mutate into a form that could infect and sporulate on other commercially valuable species.

Recommendations

23. NRW should implement a damage limitation strategy to restore its reputation which has been severely damaged in regard to plant health.
24. NRW should ensure the new *P ramorum* strategy is delivered and reviewed regularly. It should use the carrot rather than stick to encourage compliance.
25. NRW needs to engage more actively with the private sector and Forest Research.

Progress made by NRW to deliver the recommendations of the Wales Audit Office

26. No comment

Part 2

Comments from Panel members on other aspects of management of the WGWE.

Delivering Woodlands for Wales (WfW)

27. NRW is not taking a balanced approach in delivering WfW. It is placing undue emphasis on environmental measures and too little attention to the economic and social roles of woodlands.

The Stewardship of the Land

28. Soil: carbon stocks, productivity, peat.
Many important wetland areas were planted in the 20th century. Many were peatlands with very large stores of sequestered carbon. These stocks have been eroded as a result of afforestation and while some sites have been restored there is much to be done to enable these sites to function as long term carbon stores. With this exception, the stewardship of the soil has been good.

29. Water: flood flows, erosion, acid waters, pesticides.
Planting wetland areas had a disruptive effect on the catchments of many rivers, affecting flood flows, water retention and acidification. Some progress is evident with drain blocking and the creation of riparian corridors but there is still a great deal to do and much to be gained. There are examples of areas in need of restoration in all parts of urban and rural Wales.
30. Flora and Fauna: terrestrial, aquatic, woodland, open habitats, plantations on ancient woodland sites (PAWS).
The flora and fauna (F+F) associated with any intensive land use including conifer plantations will be significantly impoverished compared with semi natural habitats. Conifer plantations in acid sensitive areas also impact on aquatic F+F. While some mitigation is possible it should be recognised that the production of timber in these areas may come at a cost to the environment and commercial fisheries. The Ancient woods on the WGWE fall into two categories; those planted with non-native species and those retaining native flora. Significant efforts have been made to restore and maintain these important sites but there is more to do.
31. Landscape:
Attitudes to landscape design have changed over time. WGWE managers have been diligent in keeping pace with change but there is still a legacy of poor design “working through the system” Large scale clearfelling is particularly contentious in some areas.
32. Access and Informal Recreation:
The provision of 100,000 hectares of land with open access will probably be judged as the greatest legacy of 20th century afforestation. It is a national treasure and it is time it was given a better name than the WGWE!
- The Stewardship of the Growing Timber**
33. Species Structure:
Present and future production is very dependent on Sitka spruce. The need to diversify is acknowledged but choices of coniferous species are limited.
34. Age Structure:
Most of WGWE is planted in large even aged blocks. The need to diversify is acknowledged but progress has been slow.
35. Productivity:
The WGWE is working at maximum productive capacity.
36. Resilience: climate change, storm, drought, global markets.
The WGWE should be seen as being at high risk of damage from pests, diseases, storm and drought. This arises because of choices made decades ago. It is also threatened by market competition from overseas.
37. Silviculture:
The majority of WGWE is still managed as a rotational crop on a relatively short production cycle. This is very unusual, only 7% of Europe’s forests are managed in this way.

38. Timber Quality:

Silvicultural choices influence the quality of timber. Softwoods with a high proportion of fast grown material will be of inferior quality when compared with slower grown material. This restricts the options for use in higher value markets.

The Business

39. Timber Production: quality, quantity, cost, income, fairness, transparency, continuity.

Plantation silviculture predetermines the quality and quantity of timber produced. It is a high input system when compared to the methods generally used in Europe to grow softwood. It is important that timber produced at significant net cost to the taxpayer is sold to sustain the greatest possible number of jobs in large and small businesses

40. Commercial Recreation: accommodation, shooting, stalking, biking.

This is an area where the WGWE could do much more. It was not given sufficient priority in the past. Here is an excellent opportunity for NRW to make its mark.

Behaving as a Good Neighbour

41. Pests and Diseases:

WGWE has taken a proactive role in coordinating deer management. It attracts criticism from farming neighbours for not controlling foxes and crows.

42. Invasive Species:

NRW should set an example in dealing with these.

Roger Cooper
Chair WSAP

16th May 2014