



## Forest Stewardship Council® UK

### Scottish Biodiversity Strategy 2022 Consultation:

The Scottish Government are seeking views for their Biodiversity Strategy, which is due for publication in 2022. The Strategy is the starting point in a process which will lead into the development of rolling delivery plans and, through the introduction of a Natural Environment Bill, statutory nature restoration targets.

#### Consultation Questions:

##### 1. Scotland's Rural Environment – Farmland, Woodlands and Forestry, Soils and Uplands

#### Questions:

##### **Do the 2045 outcome statements adequately capture the change we need to see?**

We support the proposed outcome statements which are consistent with FSC's mission to promote environmentally appropriate, socially beneficial, and economically viable forest management. However, there should be clear reference within the outcomes to sustaining wood production as has been explicitly stated for food production. This would relate to the vision set in the Forestry Strategy 2019-2029 where Scotland's forests and woodlands will be managed "to balance their key role sequestering of Scotland's gross carbon emissions, with sustainable wood production to support a strong economy".

We welcome a focus on the health, resilience, and connection of landscapes, rather than solely on outcomes related to the expansion of woodland and other landscape types. Through the UK Woodland Assurance Standard, FSC Forest Management certification requires woodland managers to maintain naturally occurring native species and genotypes and prevent losses of biological diversity. This requires measures to improve habitats such as areas under lower impact silvicultural systems, veteran tree management and deadwood accumulation. There are also requirements to maintain and restore a varying mosaic of species, sizes, ages, spatial scales, and regeneration cycles appropriate for the landscape values in that region, and for enhancing environmental and economic resilience. FSC Forest Management certification can therefore support the delivery of the 2045 outcome statements for a nature rich rural environment.

## **Are the 2030 milestones ambitious enough? Are we missing any key elements?**

FSC UK supports the 2030 milestones proposed. However, as these are high-level with little supporting information on how they might be pursued, it is difficult to determine how effective they will be in ensuring the outcomes and vision are met.

We would seek assurances that the strongest levels of protection, including adopting a precautionary approach in all management activities, will be afforded to High Conservation Values (HCVs), including concentrations of biological diversity including endemic species, and rare, threatened or endangered species, that are significant at global, regional or national levels (HCV 1), and to rare, threatened, or endangered ecosystems, habitats or refugia (HCV 3). Should landscape-level restoration efforts be successful (and we sincerely hope they will be), we would want to see equivalent protection for large landscape-level ecosystems and ecosystem mosaics that are significant at global, regional or national levels (HCV 2). See <https://hcvnetwork.org/hcv-approach/>

## **What are the key drivers of biodiversity loss in this outcome area?**

We agree with the evidence and assessment that invasive non-native species and increasing deer numbers are key drivers of biodiversity loss in Scotland's woodland. A lack of active management is another key driver, as many characteristic woodland species rely on the disturbance regime created by traditional woodland management.

## **What are the key opportunities for this outcome area?**

FSC UK urges the Scottish Government to recognise the value of existing voluntary and market-driven measures to promote nature recovery. Through the UK Woodland Assurance Standard, FSC Forest Management certification requires a minimum of 15 % of every certified management unit to be managed with conservation and enhancement of biodiversity as the primary objective. This can include designated sites, but can also include areas without statutory designations, such as ancient semi-natural woodland, plantations on ancient woodland sites, appropriately located natural reserves, and other semi-natural habitats. We require that measures be taken to protect priority species, taking into account their geographic range and ecological requirements beyond the boundary of the management unit. We also require actions to maintain continuity of veteran tree habitat and to accumulate a diversity of both standing and fallen deadwood. These and other measures are currently achieved without government support. In addition, FSC verification of ecosystem services claims now allows for specific claims about the maintenance or enhancement of biodiversity, carbon, soil, water and recreation services to be independently verified. We submit that the Scottish Government should recognise and support these established and credible mechanisms, and support those forest managers who embrace them.

In addition, FSC UK firmly believes that FSC Forest Management certification, and in particular FSC verification of ecosystem services claims, is a mechanism with which government should engage for incentivising private investment in nature. FSC certification and ecosystem services verification offer a credible and well-established means to provide all parties with confidence in the quality of privately financed nature projects. We are ideally placed to work with government and other partners to recognise and incentivise good environmental stewardship, giving investors the confidence that their aims are being met through independent, third-party auditing of responsible forest management and verification of ecosystem services claims. The Scottish Government could play a role in connecting investors with FSC-certified providers, and have confidence in the outcomes thanks to FSC's independent verification.

We would welcome a commitment from the Scottish government to maintain FSC certification of the public forest estate as a credible, independent assurance of responsible forest management.

### **What are the key challenges for this outcome area?**

There should be greater attention to monitoring and evaluation of environmental outcomes from any subsidies made available for woodland creation and tree planting. Limited regulatory capacity has resulted in a lack of confidence that results are being achieved for standards are being met. Again, credible third-party certification could offer support in assuring certain environmental and social outcome requirements are being maintained.

FSC UK fully supports the management of woodlands for timber as a sustainable resource, but management practices should not be focused on productive functions of woodland to the detriment of other valuable functions such as biodiversity conservation. Therefore, we ask the Scottish Government to consider how they can ensure that demand for timber and other forest products is sustainable.