

1 - Introduction and Rationale for Providing Grant Support for Forestry

1. Do you agree that grant support for forestry should continue to be improved and developed as a discrete scheme within the overall package of land support?

Yes. ADMG agrees that grant support is vital for the continued expansion of Scotland's woodlands. To enable woodland creation to be accessible to all and for the sake of clarity it would make sense that it remains a discrete scheme within the overall package of land support. However, a current lack of joined up thinking between, agricultural, forestry, deer and environmental policy leads to a lack of cohesion and can create difficulties for applicants.

An example would be having to work through a hierarchy of different funding streams to enable planting on marginal ground for the likes of riparian woodland. Currently a scheme has to be formally rejected by Scottish Forestry before being eligible for other sources of funding such as the Nature Restoration Fund. This adds a layer of bureaucracy in a process which is usually time-pressured due to short funding windows for applications in competitive schemes. Similarly, to date there has been little regard to cross-compliance between the Agencies where for example an owner has claimed Forestry Grant funding but fails to carry out adequate deer management. Equally the rejection of schemes for those applying can lead to a reluctance to engage in planting or biodiversity restoration.

ADMG is concerned that the FGS is too prescriptive; whilst tree planting is vital to the climate crisis, we have concerns that areas that are currently marginal for FGS remain off limits for schemes due to concerns about number of stems per hectare for perceived success rather than improvements for biodiversity and the ambitious targets of the Scottish Biodiversity Strategy. The importance of deer management to forestry development would suggest that direct support for deer management would be extremely helpful as well as (critically) continued support for deer fencing wherever required as, in many areas, trees simply will not be established without stock fencing or deer fencing. Any potential loss of the ability to construct grant aided deer fencing would deter many upland estates from carrying out new woodland creation / restoration projects or could lead to an increase in failed woodland schemes in cases where deer fencing is not undertaken. Consideration should also be given to support for the maintenance of fencing with modern fencing materials lasting a shorter amount of time than was previously the case.

All herbivores must be considered carefully when creating woodland - sheep, cattle, hares, rabbits, voles etc can all be detrimental to forest creation.

2. Are there any changes that would allow for better complementarity between the forestry and agriculture funding options?

Yes. We believe that some of the reasons for current hesitancy to plant in some areas include a lack of flexibility in the system that prevents some land managers working with Scottish Government to plant trees. Whilst the current system enables large scale planting schemes farmers and land managers need to be able to be more flexible than this. Smaller planting schemes that may be beneficial to riparian areas, marginal land and connectivity should be encouraged not discouraged as can currently be the case.

Fencing costs have gone up and consideration needs to be given to increased funding for fencing materials, both deer and stock fencing. Fencing material no longer lasts twenty years due to restrictions on timber treatment and fence posts are now unable to last longer than ten years. This needs to be considered particularly on slow growing poorer soils where trees may need protection for at least 25 years before they are less vulnerable to deer and sheep.

Increased incentives for all facets of deer management should be considered; currently very little funding is available for deer management and venison processing when compared to other rural incentives.

2 - Forests Delivering for Scotland's Climate Change Plan

3. How can the support package for forestry evolve to help tackle the climate emergency, to achieve net zero, and to ensure that our woodlands and forests are resilient to the future climate?

Continued financial support is required to enable planting schemes. This should include incentives for essential deer management required to protect trees. ADMG would like to see continued support for deer fencing which should be considered as a vital option not only to protect trees but also to ensure that in those areas where there is little or no seed source for natural regeneration trees can be established if desired. If however fencing is not recommended or advised on the grounds of landscape issues, then adequate funding needs to be put in place to enable effective deer management over a substantially longer period of time than the current 5 year funding period. At the moment owners are being forced to consider not fencing in certain places, but with 100% of the risk sitting with the owner. This does not encourage change.

The current parameters that planting schemes have to fit within as well as the strict numbers of stems per hectare required to realise support means that marginal areas that could be planted but which are likely to be beneficial to climate change and biodiversity are currently not planted. Entrants to schemes can often be risk averse and fearful of potential failure which restricts take up. The current agri support system is complicated for new entrants and the high likelihood that schemes may be turned down can lead to 'application fatigue'.

Slow processing times and a lack of facilitation and support from Scottish Government means that people can also be reluctant to enter into schemes.

Facilitation should be a priority if woodland targets are to be achieved. For many owners, the perceived policy urgency for woodland creation schemes is not matched by the reality of a burdensome list of potential constraints when faced with an application process, whether that is landscape issues, issues with planting restrictions on certain species, conflicts with protected species – the perception from owners is that the list of constraints seems to be increasing. This is perhaps not surprising as in many cases, straight-forward "low-hanging fruit" sites have likely already been explored, but as these become exhausted the need for greater flexibility in schemes is going to become more necessary if climate targets are to be met.

4. Private investment through natural capital and carbon schemes can make a valuable contribution to climate change. Do you agree that the grant support mechanism should have more flexibility to maximise the opportunities to blend private and public finance to support woodland creation?

Yes. Any avenues should be considered that will enable land managers to undertake positive work. This should include private funding which may be quicker and more flexible than government backed schemes.

If the grant system can make the most of private and public finance to support woodland creation then this would be helpful. Help and advice from Scottish Government on private mechanisms would be useful. Some owners have stated that the marketplace feels underdeveloped and are waiting for it to feel safer for investment.

Funding avenues for Natural Capital or Biodiversity don't seem to be as well thought out or advanced in Scotland and we seem to be behind the curve on the development of these. Currently riparian schemes are proving extremely challenging to finance given their location and herbivore pressures. It may be that these types of schemes are less attractive from a carbon perspective given that many potential catchment riparian schemes are at too high an altitude to be productive. However, the ecological value of these schemes is considerable from a climate change, biodiversity and habitat

connectivity perspective. There needs to be greater thinking as to how these schemes could be funded.

The stringent additionality criteria required under the Woodland Carbon Code may not be helpful in incentivizing all landowners to create new woodlands with the help of carbon credit monetization.

5. How could the current funding package be improved to stimulate woodland expansion and better management across a wide range of woodland types, including native and productive woodlands?

It is vital not to lose sight of the importance of deer fencing particularly in the establishment of trees that are vulnerable to browsing by herbivores. Talk of establishing trees without fencing is ambitious particularly close to commercial forestry where deer densities are often high, or in situations where neighbouring landowners' objectives for deer management do not align. The importance of managing deer on a landscape scale must be considered. If neighbours have differing deer management intentions then trees may not be established without deer fencing, or very high levels of culling which can lead to the breakdown of landscape scale collaboration without careful consideration.

If fencing is not recommended or advised, then adequate funding needs to be put in place to enable effective deer management over a substantially longer period of time than the current 5-year funding period. At the moment owners are being forced to consider not fencing in certain places, but with 100% of the risk (and economic burden) sitting with the owner.

More consideration should be given to trialing/funding alternative methods to deer control in marginal areas - for example the use of stock-fencing and electric off-set fencing for riparian woodlands. Setting a lower bar for "successful" establishment would encourage more owners to embark on schemes which are currently extremely unattractive due to the risk or the cost of traditional fencing. Whilst deer fencing is expensive, deer management costs can be equally prohibitive over long periods of time and can be detrimental to income on some landholdings.

6. Do you agree that it should be a requirement of grant support that woodlands are managed to ensure that they become more resilient to the impacts of climate change and pests and disease?

Yes

How can the grant scheme support this?

There is clearly a need to respond to the challenges of climate change and historic biodiversity loss. Greater species diversity will be required as well as giving consideration to species that we think may thrive in the changing climate ahead. We also need to be considering how we are going to manage woodlands in the context of greater risk of wildfires. Ensuring there are good access tracks and in-built design for natural firebreaks will be important. This should be an essential component of woodland design combined with the need for greater accessibility for adequate deer control and extraction.

3 – Integrating Woodlands on Farms and Crofts

7. Which of the following measures would help reduce the barriers for crofters and farmers wanting to include woodland as part of their farming business? Please select all that apply.

- *Better integration of support for woodland creation with farm support mechanisms, Knowing where to get reliable advice*
- *Clearer guidance on grant options,*
- *Flexibility within options,*
- *Support with cashflow,*
- *Information on how current land use could continue with trees integrated throughout*

- *Are there others not listed above?*

All of the above are important but priority should be given to the facilitation and the flexibility of schemes by Scottish Government. Land managers' priorities vary and consideration should always be given to the wide range in management priorities. A 'one size fits all' approach to Scottish tree establishment is likely to lead to problems and failure.

Consideration of the planting of what might have been previously considered as marginal land for FGS schemes should be prioritized, including the establishment of lower densities of stems per ha if these are likely to aid carbon capture and biodiversity targets.

Much of the Highlands is not registered for agricultural production and it is important that these areas are equally able to enter into the FGS despite not being agricultural land. Equally future incentives for deer management should not exclude areas that are currently not registered for agriculture. This is a small point but there is currently an anomaly in the Deer Legislation regarding the rights of the tenant Crofter to control deer prior to a woodland being established on croft ground. Currently it is unclear where the responsibility to take a compensatory cull lies - which is often a requirement prior to a woodland scheme being established. Sporting rights are usually retained by the land owner but the crofter has no right to take deer for welfare grounds and only has the right to take deer to prevent damage to agricultural land or to established woodland.

8. Establishing small woodlands can have higher costs. What specific mechanisms would better support small scale woodlands and woodland ownership?

Currently it seems that the same rigid rules apply to smaller schemes as larger ones and it is not economically viable for owners to pursue these schemes or that they become so burdensome to apply for that interest is lost. especially if fencing is required and capital costs are high compared to planting costs and current available support.

The costs of employing a consultant to assist with mapping and applications often far exceeds the benefits to be derived and again the perceived constraints are currently off-putting.

More assistance for deer management would be helpful particularly if an owner of small-scale woodland is reliant on paying someone to carry out control for them.

4 - Forests Delivering for People and Communities

9. How can forestry grants better support an increase in easily accessible, sustainably managed woodlands in urban and peri-urban areas?

ADMG believes that access to woodland is important in urban and peri urban areas but that consideration should be given to deer management in these situations that create habitat for deer and where deer management can be difficult due to high access pressures.

10. How can grant support for forestry better enable rural communities to realise greater benefits from woodland to support community wealth building?

Enhanced grant support for woodlands will enable communities to benefit from the woodlands that are planted all over Scotland. The ability for people in Scotland to benefit from the Right of Responsible Access will mean that everyone can benefit from woodland creation, carbon capture and improved biodiversity.

Greater access to community woodlands and carbon schemes would be a way to realise health benefits but schemes must balance the ecological benefits of "rewilding" or natural capital schemes with the opportunity to develop continuous-cover productive forestry that creates sustainable employment, provides building materials for the local community as well as fuel and jobs in deer management.

11. How can the forest regulatory and grant processes evolve to provide greater opportunities for communities to be involved in the development of forestry proposals?

Currently the woodland consultation process requires that members of the public (including local communities) have the opportunity to comment on new woodland proposals. It is difficult to see how this could be improved upon. Given that increased woodland cover, particularly forests with timber production as an objective, enables rural communities to realise benefits (see comments to question 10.) there is a strong argument for regulatory and grant processes to be streamlined, simplified and speeded up.

12. How can the forestry regulatory and grant processes evolve to ensure that there is greater transparency about proposals and the decisions that have been made on them?

Forest proposals should be shared with neighbours and communities including, in particular, local Deer Management Groups as a matter of course. Managing deer on a single landholding basis is counterproductive to woodland expansion.

13. Forestry grants have been used to stimulate rural forestry businesses by providing support with capital costs. Do you agree that this has been an effective measure to stimulate rural business?

No

a. How could this approach be used to support further forestry businesses?

It would be extremely helpful to have aid with some of the capital costs of deer management. For example, deer larders, venison processing and deer management equipment.

Deer management is often undertaken as part of a business and supporting the capital costs would help incentivise effective deer management and local business. Incentivising local businesses and deer managers to undertake deer management would in turn be beneficial to remote rural communities.

b. How could this approach be used to support further skills development?

The skills required to effectively manage and process deer in line with Best Practice Guidance require considerable capital input and help with this would improve the ease of entry into deer management. It would also help promote employment in deer management in remote rural communities.

14. How could the FGS processes and rules be developed to encourage more companies and organisations to provide training positions within the forestry sector?

5 – Forests Delivering for Biodiversity and the Environment

15. The primary purpose of FGS is to encourage forestry expansion and sustainable forest management, of which a key benefit is the realisation of environmental benefits. How can future grant support better help to address biodiversity loss in Scotland including the regeneration and expansion of native woodlands?

Currently most forestry grant schemes exclude planting on marginal ground where arguably some of the greatest biodiversity benefits could be gained from creating habitat corridors and planting alongside upland riparian areas. This is where the greatest gains could be made ecologically. Greater flexibility in defining “regeneration” eligible for payments would also encourage more owners to undertake these schemes.

16. Herbivore browsing and damage can have a significant impact on biodiversity loss and restrict regeneration. How could forestry grant support mechanisms evolve to ensure effective management of deer populations at:

Landscape scale?

The Association of Deer Management Groups facilitates landscape scale deer management across 3 million ha of the highlands. Effective deer management requires good collaboration between deer managers despite a variety of land management priorities. Deer management is one of the few rural industries that receives little or no direct financial support. Greater incentives for deer management would be helpful in any loss in sporting income.

Funding must be continued for deer fencing to protect trees. In areas where deer densities are relatively low there will still be a requirement to protect trees. Without the cooperation and collaboration of neighbouring properties, protecting trees will become increasingly difficult.

Realistic expectations should be placed on what can be achieved purely through deer reductions. Deer fencing will have to be an ongoing tool in woodland protection. Importantly in many areas stock fencing will continue to be required to protect trees from livestock.

As more of Scotland becomes forested in line with Scottish Government targets deer management will become ever more crucial. Deer are likely to become more productive within improved habitats and deer management will become more difficult as tree cover increases. This has been seen in areas that were heavily forested during the 1970s and 80s where deer management has become extremely difficult and time consuming. ADMG advises that provisions should be made now when planning forestry for future deer management including access for ATVs, deer extraction and deer management.

Small scale mixed land use?

Collaboration between neighbouring deer managers will likely be more important but more difficult in areas where landholdings are smaller, and objectives are more mixed. This can be seen across much of the lowlands where culls are unknown for many areas and information on deer numbers is limited. Mixed land uses, whether large or small, will require a flexibility of approach to tree planting. Other funding avenues to support community deer larders would ensure there is a hub to support effective deer management, would encourage collaboration and would also provide an opportunity to gather information about deer populations and culls, particularly in the lowlands where this information is missing or difficult to gather.

If you wish to make any other relevant comments, please do so:

ADMG has concerns about the perceived success of the FGS so far and why has there not been more take up to this point. Current Scottish Government targets are unlikely to be met if the existing problems are not addressed. There should be greater analysis undertaken of the reasons why initial applications have been either declined or not taken forward - or indeed why applications have been rejected. It would be extremely useful to understand this to better facilitate more planting in the future.

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