

Submitted to Future Grant Support for Forestry  
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Ministerial Foreword - Forestry in Scotland is a sector that we can be justly proud of.

## 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

Please explain your answer in the text box.:

The Landworkers' Alliance supports the continuation of grant support for forestry within the overall package of land support. However, we would like to note that significant changes and improvements are required to make this grant scheme fit for purpose, and to enable Scotland to achieve its climate and biodiversity targets in a just manner.

The grant system thus far has favoured large landowners and forest agents. The area-based payments system has awarded vast sums of public money to some of Scotland's wealthiest landowners, many of whom would be easily capable of covering capital costs of establishing woodland themselves. Meanwhile, it has been extremely difficult for small scale foresters to access support. This unjust allocation of funding has resulted in missed opportunities for a thriving forestry economy and meaningful public involvement in our woodlands. Going forward, grants should be allocated in a tapered (redistributive) manner, with more funding available per hectare for the first few hectares planted or managed and less awarded per hectare above a certain threshold size. This would mean smaller woodlands with high social and environmental returns could receive significant grants despite their small size, and larger land holdings would have their grants limited to some extent.

The existing application process is cumbersome and complex, and is even more so for those planting or managing biodiversity friendly mixed woodland. The application process must be streamlined and simplified, and excessive bureaucracy should not dissuade foresters from planting diverse woodland. Funding should be made available to cover the time spent by foresters filling out applications for grant funding, particularly for those working at smaller scales who receive considerably less grant funding for the same amount of time spent on applications and who often are short of both time and capital for their work.

While we recognise the importance of having money specifically dedicated to forestry, better integration with other aspects of land management under the Agriculture Bill is essential. In particular, a joined up application process which allows people to apply for multiple schemes at the same time and reduces the administrative burden would be helpful for encouraging integration of trees into farmland and other landscapes. Funding for trees on farms should also be made available under other tiers of the Agriculture Bill, rather than only being available within a distinct forestry scheme. For example, Tier 2 agricultural payments should be available for those maintaining active silvopasture. This is discussed in more detail in our response to Question 2.

It is essential that an overall strategy for forestry in Scotland is developed. The Landworkers' Alliance recognises and supports the need for increased woodland and tree cover in Scotland, as well as development of improved local supply chains for both saplings and timber. Increasing tree cover and woodland area should be carefully planned at a landscape level to ensure the right trees are planted in the right place. Finance for new woods and trees should be contingent on careful consideration of where new woodlands are to be planted, how the woodland will be managed, and on the mix of tree species and planting densities. Climate change, and new and increased numbers of pests are contributing to increased shocks and stresses to woodlands and there is an urgent need to build resilience through diversity of species, planting and management systems.

The future grant system must be designed such that it leads to a substantial increase in the number of people employed overall in forestry, rather than encouraging automation and de-skilling.

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

Yes

Please explain your answer in the text box.:

Better complementarity between forestry and agricultural funding is essential. Tree crops offer great potential to provide resilient income streams and food and timber that is currently imported. They can also help the productivity of adjacent crops and stock. By providing protection from the weather and homes to pollinators and pest predators, they can easily outweigh any lost land area of production. Trees provide shade and wind protection, which reduce heat stress and wind-chill of livestock; performance is improved and mortality reduced. Economic returns from forage/livestock production continue while creating a sustainable system with environmental benefits. By growing at different times of the year, and in different spaces they allow land to be used for multiple purposes, increasing its overall output, despite the space the trees may take up. The combined tree plus forage productivity of silvopasture can substantially exceed that of pastures or forests grown alone.

We suggest the following changes to the forestry grants system to allow for better integration with agricultural funding:

Simplification and integration of the application process for funding for tree planting and management. Farmers and crofters already experience a high bureaucratic burden when applying for agricultural payments, which poses a major barrier to applying for further funding for forestry projects. Those applying for agricultural payments should have the opportunity to apply for funding for tree planting and management as part of the same application

process. In addition, the application process for small-scale woodland, which is most common on agricultural land, should be made much more straightforward.

Capital support should be offered for on-farm tree planting under the forestry grants scheme, with this leading to eligibility for Tier 2 direct payments for having trees integrated into agricultural land.

A mandatory redistributive payments system which is coherent across all agricultural and forestry payments schemes. The current area-based payment system for both forestry grants and agricultural payments results in a very large amount of public money going to Scotland's richest landowners and largest businesses, and discriminates against small-scale farmers and foresters. At least 30% of the budget for both forestry and direct agricultural payments should be redistributed such that applicants receive more funding for the first few hectares of land applied for, and less funding per hectare above a certain threshold. As woodland planted on farm is likely to be smaller scale, this is particularly essential for making integration of trees into agricultural land financially viable, and encouraging farmers to consider tree planting. In addition, mandatory redistribution of area-based payments will allow Scotland to remain in line with the most recent EU Common Agricultural Payments legislation.

Introduction of payment mechanisms under the forestry grants scheme which specifically support integration of trees onto farms and crofts in an agriculturally appropriate manner. There are many innovative and traditional ways in which trees can be integrated into agricultural landscapes which go beyond planting of distinct areas of woodland, and agroforestry has been found to have multiple environmental benefits and to be more biologically productive and more profitable than forestry or agricultural monocultures. For example, shelterbelts are a great way to bring trees onto farms, providing habitat for wildlife and increasing resilience of agricultural practice without reducing productivity. Traditional parkland is another classic use of trees in a grazed landscape. More shade and tree fodder crops mean healthier animals, more live weight gain, less heat stress and temperature extremes, and often more natural animal behaviour. Alley-cropping agroforestry systems hold huge potential for successful integration of trees into crop production. In addition, establishment and maintenance of orchards on farms can increase tree cover. It is essential that future forestry payments recognise and support tree planting systems such as these which have clear agricultural benefits, in addition to support for woodland planting.

Appropriate regulations for tree protection on agricultural land. Landworkers' Alliance members who have received funding for tree planting on grazed land noted that the current grant system regulations required them to install excessive measures to protect trees from sheep, which were both expensive and unnecessary. Regulation around tree protection should be changed so that it is fit for purpose. Strategic land management planning at a landscape scale to ensure productivity of prime agricultural land is maintained, and woodland is planted in appropriate locations.

Fund research, capacity building and awareness raising efforts to bridge gaps between crofting/farming and forestry on the ground, in particular, in relation to agroforestry.

## 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?

Please explain your answer in the text box.:

In order to increase tree cover in Scotland to help tackle the climate emergency, forestry support must evolve to support tree planting and woodland management at all scales to allow for optimum integration of trees into the landscape. Current support packages have primarily benefited large-scale businesses and landowners, who often already have the capital required to plant and manage woodland. Smaller scale forestry, integrated into rural landscapes, urban and peri-urban areas, and across farmland and crofts, must be actively supported and encouraged to allow Scotland to reach its full potential in terms of climate change mitigation and resilience. As we have described in our answers to previous questions, the LWA supports the introduction of a redistributive payments system for tree planting and management, which would extend support to smaller scale forestry projects and enable better integration of trees into landscapes across the country.

In order to support tree planting and forest management on the scale required to help us tackle the climate emergency, a large number of new saplings will be required over the coming years. Tree nurseries, particularly those growing diverse and native trees, should therefore be both set up and supported under the forestry grants system. This is essential to keep supply chains for forestry as short as possible, and ensure Scotland can meet her own demands for young trees to plant.

Forestry grant support must evolve to better support planting and management of diverse woodland. In order to ensure long-term resilience of our forests and woodland, diversity in terms of woodland scale and structure, forestry management practices, and tree varieties and ages is essential. Strategic planning is necessary to ensure the right trees are planted in the right place, and appropriately managed. Diverse mixed woodland offers greater resilience to extreme weather events, as well as reducing the spread of pests and diseases. Mixed age and mixed variety stands of trees are more resilient than monocultures, and offer huge biodiversity benefits. Under the current grant system, levels of bureaucracy are considerably higher for those managing diverse woodlands, as each variety of tree must be individually recorded and accounted for. Our members have noted that this places a considerable administrative burden on them. This disincentivises mixed woodland creation and management. The grant application process for mixed woodland must be significantly simplified in order to promote diversity. In addition, when grants are awarded preference should be given to diverse mixed woodland over clear-fell monocultures. We suggest that above a certain scale there should be no funding for single species stands, with enhanced grants for planting intimate mixed species at the stand level (3 or more species).

Shifting forestry support away from monocultures towards resilient mixed woodland should not mean a reduction in productivity of woodland in Scotland. Forests and trees will play a central role in restoring the earth, but new planting must also include our need for forest products and forestry jobs. Continuous Cover Forestry (CCF) can transform forest plantations to structurally and biologically diverse woodlands, in which quality timber is produced while avoiding clear-felling. CCF results in much reduced soil erosion, desiccation, and compaction as there is no major clear felling; increment is removed in cyclical interventions. The forestry grants system should evolve to promote the use of continuous forestry cover systems, to allow species

mixes, and to create resilient species and age diverse woodlands in place of clear-fell, monoculture plantations.

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,

No

Please explain your answer in the text box.:

The LWA would like to take this opportunity to question the Scottish government's claim that private natural capital and carbon schemes can make a valuable contribution to climate change. Evidence from around the world suggests that this is not the case, with many such schemes shown to lead to no reduction in atmospheric carbon, and to have numerous serious detrimental effects on local communities and landworkers. In particular, carbon schemes which allow GHG emissions from private entities to be 'offset' through land-based carbon sequestration distract from the urgent need to stop emitting carbon in the first place. Tree-planting must not be used as a means to allow the continued emission of GHG. In order to avoid breaching our carbon allowance and stop global heating, the burning of fossil fuels must stop. In addition, such schemes currently place a large burden of risk on foresters and landworkers, who have little power in these relationships and are liable if extreme weather or pests/disease lead to destruction of trees. Given this evidence and context, we are extremely concerned that private natural capital and carbon schemes are being promoted by the government without caveat or consultation.

We are also concerned that the government is not considering the implications of double accounting for emissions reductions funded by private finance. Considerable use of tree planting and other methods of carbon sequestration are essential to the Scottish government's emissions reduction plans. However, if carbon schemes such as private offset projects are used to fund woodland establishment or management, sequestered carbon is then 'owned' by private entities, and cannot also be counted towards national carbon targets. Serious regulation of carbon markets is therefore required to ensure private investment does not undermine Scotland's carbon reduction ambitions. Certainly, the government should not use public money to fund woodland already funded by corporate investment.

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?

Please explain your answer in the text box.:

Prioritising a sustainable Scottish supply of healthy young trees and a network of local tree nurseries is essential to stimulate woodland expansion across woodland types. The funding package should be improved to offer grants which support small-scale tree nurseries specialising in locally sourced and propagated tree species.

As described in our answers to previous questions, a redistributive payment system which gives more funding for the first few hectares of woodland planted or managed should be introduced. This will encourage more land managers to get started with forestry and will ensure a wider range of woodland types are supported.

The application process should be simplified and streamlined. Applying for funding for mixed and native woodland should not impose a greater administrative burden than applying for monocultures. The current prescriptive 'models' system should be re-evaluated to ensure all types of woodland can be supported. Support should be available for first time applicants to encourage more land managers to engage with forestry and tree planting.

The restoration of existing woodland at all scales should be prioritised during grant allocation.

Increased support for deer management is essential to stimulate woodland expansion and improve management. Our members who work in forestry consistently raise deer management as a key challenge to forestry in Scotland. Current support available for deer fencing under the forestry grants scheme is astonishingly low compared with the actual cost of purchasing and installing fencing. One of our members on Skye explained that the costs for deer fencing on his croft were £22 per metre, while grants available to support this offered only £7.80 per metre. This is particularly challenging for smaller scale foresters, who often lack the capital to cover the costs of fencing themselves. Deer also pose a major challenge to natural regeneration of woodland. We suggest that funding allocation for deer fencing is increased and offered at a true cost per-metre rate, to avoid disadvantaging smaller-scale foresters. In addition, we suggest the Scottish government explore all possible regulatory avenues to reduce deer numbers in the Scottish countryside, including increasing cull targets and denying public money to estates which actively encourage deer breeding for sport.

Support tailored advisory services. FGS is complex and bureaucratic and it is currently very difficult for the non-professional to prepare and submit a grant proposal, and therefore not cost effective for small scale schemes. Currently Scottish Forestry woodland officers have a limited advisory/support role, the FAS service does not have the capacity to deliver the level of support needed for small scale forestry and integration of forestry onto farms and crofts.

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?:

The Landworkers' alliance agrees that it should be a requirement of grant support that woodlands are managed carefully for economic and ecological resilience, biodiversity and social inclusivity, with an overall aim of increasing the percentage of woodland under active management. However, this regulation must ensure that a 'one-size-fits-all' approach is avoided, and that woodland across the country is managed with a diverse mosaic of different types of management systems. Diversity requires recognising different forest and woodland types, and recognising different management approaches including for hedgerow, orchards, plantations and broadleaved woodland.

### 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, Intervention level, Support with cashflow, Information on how current land use could continue with trees integrated throughout

Are there others not listed above?:

In addition to the above points, the Landworkers' Alliance believed the following are required to reduce barriers for crofters and farmers:

Better financial support for small-scale tree planting, which is often most appropriate on agricultural land, including through the introduction of a redistributive payment system for forestry grants. This is particularly crucial to support tree integration on crofts.

A simpler grant application process which streamlines agricultural and forestry payments

Support for integration of trees into farms and crofts in structures other than patches of woodland - e.g. shelterbelts, orchards, low-density tree planting on grazing land, establishment of small copses

Improved promotion of tree integration to farmers and crofters. Land management debates have previously framed forestry as in competition with agriculture, which has disincentivised tree planting on agricultural land and encouraged negative perceptions of forestry in the farming and crofting communities. This presents a major barrier which must be tackled by the future forestry grants system. We suggest that shifting terminology to centre agricultural practice, for example use of terms such as 'silvopasture', may be useful to encourage farmers to consider tree planting. The Scottish government must invest in countering these narratives of 'trees versus farming' and actively encourage farmers and crofters to integrate trees into their practice.

Shorter and more flexible contracts for tree planting should be made available for farmers and crofters. Current 20 year contracts may intimidate farmers and crofters as they leave little room for future diversification, or responsive changes in farm land-use. In particular, shorter contracts may stimulate tree planting on tenant farms.

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

Please explain your answer in the text box.:

In order to support small scale woodlands, it is essential that a mandatory redistributive payment system is introduced, providing higher payments for the first few hectares of woodland established or managed, and lower payments above a certain size threshold. The current grant system primarily supports large landowners and forest agents, who often already have access to capital, and is an inefficient and unjust use of public money. We recommend that at least 30% of the forestry grants budget is redistributed in this manner to support smaller scale woodland and improve fairness in the grants system.

In addition, the application process for forestry grants puts a considerably higher strain comparison with returns on small-scale foresters than larger scale applicants. We therefore propose that, in addition to simplification of the application process, financial support is offered to smaller-scale applicants to cover time spent on applying for funding.

A proportion of the available budget should be ringfenced for smaller occupiers and making it available on a non-competitive basis subject to minimum criteria. Schemes should consider biodiversity, climate, community benefits as part of the 'value for money' equation to adequately support small-scale projects. In addition, a higher minimum standard payment for small-scale woodlands to recover fixed costs.

Grant aid must also be made available for small scale structures of tree planting other than woodland, such as the creation of small copses and shelterbelts.

New entrants to forestry, as well as farmers and crofters diversifying into the sector, should receive specific financial support for the establishment of new woodland at small scale.

### 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?

Please explain your answer in the text box.:

Improved support for small scale woodland is essential to promote accessible and sustainable woodland in urban and peri-urban areas. In such areas it is unlikely that space will be readily available for woodlands spanning many hectares. However, even very small areas of tree cover in urban areas can offer substantial benefits in terms of community well-being, biodiversity enhancement and urban cooling. The current grant system, which allocates funds on a per hectare basis, offers little to no support to such urban and peri-urban woodland. A redistributive payment system, with enhanced financial support for establishing and managing the first few hectares of woodland, would greatly improve support in these areas.

Specific support for structures of tree planting which are appropriate for urban and peri-urban areas should be available in addition to support for traditional woodland establishment. For example, trees along roads and railway lines can be sustainably managed for wood fuel, to provide noise abatement and clean air shelter belts, and should be supported under the forestry grants scheme. In addition, establishment and restoration of community orchards in urban areas should be financially supported.

The opportunities available under the forestry grants scheme should be better promoted to urban and peri-urban communities, who are often unaware of such schemes. Advice and training on urban forestry should be made available to these communities so that they can realise the potential for integration of trees into their environment.

Links should be established between every school and an active forest, woodland or orchard operation, and should include school visits.

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

Please explain your answer in the text box.:

Support must facilitate a dramatic increase in the percentage of existing woodlands that are actively managed, enabling a diversity of management systems, and a boost for local economies. A requirement for ongoing management of woodlands, and provision of local employment where labour is required, should be a requirement for grant eligibility.

In order for rural communities to realise the greatest benefits from woodland, we must remove the historic and artificial separation between conservation woodlands and commercial plantations. Timber production from continuous cover forests can support local communities and provide local jobs, while maintaining beautiful and accessible forest for community wellbeing and recreation. Forestry grants should prioritise support for creation and management of this type of woodland. As part of this, forestry grants should focus on getting small and neglected woodlands back into productive use using local skilled labour.

New woodlands and forests must be planned carefully, for economic and ecological resilience, biodiversity and social inclusivity. This requires better consultation with local communities before large-scale woodland is established, to ensure maximum benefits for everyone. In general, this is likely to mean a shift away from monoculture plantations towards mixed age and mixed variety woodland which provides a wider range of benefits for local communities.

Support, advice, and grants should lead to a substantial increase in the number of people employed overall in forestry, rather than encouraging automation and de-skilling. In addition, a duty should be placed on forestry grant recipients to meet certain workers rights standards for employees, in a manner appropriate to the nature of the work and in line with what is being discussed elsewhere in the Agriculture Bill.

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?

Please explain your answer in the text box.:

Consultation and awareness raising including publicity needs to be done much better (and at the earliest stage possible) and needs to take into account the needs of different demographics. A sign at the roadside may be more appropriate than an online advertisement. As part of CWB impact assessment, appropriate consultation and a plan on how community input will be taken forward – with solid and clear justifications in case changes were not made – should be part of decision-making around grant awards.

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?

Please explain your answer in the text box.:

Introduce a permanent register for the post-application stage. The reason why the grant was approved (including in relation to CWB impact) needs to be published, and what the amount was

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?

Not sure

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

Thus far, the forestry grant system has been effective in stimulating and supporting large-scale forestry businesses. However, due to the predominantly area-based payments system, smaller rural businesses, which are more likely to be owned in local rural communities, have been left behind, and have

not benefited from the forestry grants scheme. In order to support rural businesses, capital support must prioritise smaller-scale forestry projects and smaller scale local businesses. We suggest that a redistributive payment system could lead to improved support for diverse rural businesses.

Better integration with the agricultural payments system (as described in our answer to Question 2), and the introduction of payments specifically for the integration of trees on farms and crofts, could help to diversify agricultural businesses and improve rural economic resilience.

Greater flexibility is needed in terms of eligibility of capital items – include a broader range of items which support rural development including forestry equipment like sheds, hardstanding, and deer larders.

Threshold for usage/facility (at least 500 hours per year for primary machinery and 200 hours per year for secondary machinery) needs to be reviewed so as not to exclude micro business. Currently, funding is very much targeted at full-time forestry contractors thus disregarding the significant potential of small-scale foresters to deliver on a wide range of policy objectives. Inclusiveness of part time foresters – undertaking forestry as part of a wide range of work opportunities including crofting and farming – should be a priority for reform.

New entrants to forestry must be supported with a relevant programme of business grants and advice. For people with proven ability and access to woods, grants of up to £100,000 for start-up costs should be made available. This will stimulate the development of rural businesses.

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

Capital funding should be available under the forestry grants system for training and further skills development for foresters, farmers and all other landworkers who work with trees. Training available under such schemes should cover a diverse range of forestry practices.

Capital funding should primarily be used to support peer-to-peer training networks for forestry, rather than remote educational establishments. New entrants to forestry should be supported with a relevant programme of funded advice and training.

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

Please explain your answer in the text box.:

Provide funding for community forester placements.

## 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?

Please explain your answer in the text box.:

Forestry grants must prioritise support for diverse and resilient, well-managed, multi-purpose forests. In addition to the economic and community wellbeing benefits of such forests described above, this is essential to promote biodiversity throughout all of Scotland's woodland. For a truly sustainable forestry sector we must remove the historic and artificial separation between conservation woodlands and commercial plantations, such that all forests support biodiversity.

Grant application procedures and regulations should be simplified for mixed and continuous cover woodland, to relieve the administrative burden currently placed on those wishing to establish and manage woodlands for biodiversity.

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?:

Landowners should not expect just to reap benefits from high deer numbers, but should carry significant responsibilities in ensuring that numbers are kept at appropriate levels – and otherwise should bear the resulting costs for other land users. Those with the right skills to control numbers should be encouraged and supported to do so on a landscape scale.

Estates which breed deer for sporting purposes should not be eligible for support under the Agriculture Bill, including under the forestry grants section.

Small scale mixed land use?:

Deer browsing has been repeatedly raised by our members as a challenge to forestry creation and management. Current grant options for deer management are astonishingly insufficient, with only £7.80 per metre available for deer fencing. Capital costs for fencing are significantly more than this, particularly for small-scale and irregularly shaped woodland, and for those in remote areas. Capital funding for deer fencing should be made available at a per-metre rate which is equivalent to the actual cost of the fencing.

Capital funding for deer fencing should also be made available to those developing or managing agroforestry systems.

If you wish to make any other relevant comments, please do so in the text box below.

Please add your comments here.:

1) Social conditionality should be introduced into the FGS, with land managers only eligible for grant support if the working conditions of their employees meet certain standards. For example, all recipients of grant funding should pay their employees at least the living wage for their area, and should not employ people on precarious zero hours contracts. This conditionality should be in line with that applied to other funding under the Agriculture Bill.

2) A holistic New Entrants support package for forestry should be established, which includes help with accessing land, free advice and training, and capital costs for starting out in the sector. This will enable Scotland to meet its tree planting goals without relying so heavily on large scale corporations and landowners.

3) We would like to reiterate our concern that the Scottish Government is not introducing tighter regulation on carbon markets and private investment in natural capital. There is substantial evidence to show that such markets do not result in reduced greenhouse gas emissions, and carbon speculation is already driving land prices up in Scotland, reducing access to land and increasing concentration of land ownership. This is in direct opposition to the Scottish Government's stated goals under the upcoming Land Reform Bill.

## About you

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Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:

The Landworkers' Alliance

Scottish Forestry would like your permission to publish your response. Please indicate your publishing preference:

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We may share your response internally with other Scottish Forestry policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Forestry to contact you again in relation to this consultation exercise?

Yes

I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

I consent