

Response ID ANON-VEPG-2GTX-Q

Submitted to Future Grant Support for Forestry
Submitted on 2023-05-17 08:43:01

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?

Not sure

Please explain your answer in the text box.:

BSBI Cfs is not concerned about the administrative mechanisms for provision of land support, but is greatly concerned about the objectives, rules and operation of land support. We welcome the presence of a consultation process operated by Scottish Forestry, and note the stark contrast with the situation regarding agriculture. If some administrative streamlining were to take place, we would wish to see the consultation process expanded to cover change of land management instigated through agricultural operations.

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.:

Many of the comments BSBI Cfs made on the recent Scottish Government Consultation "Delivering our Vision for Scottish Agriculture: Proposals for a new Agriculture Bill" apply also to forestry. Since they form a coherent whole, these comments are copied in full as Appendix 1.

Of particular relevance to the FGS consultation are the following.

From point 2: "BSBI believes that protection of the extent and quality of established habitats is of paramount importance for plants and other forms of biodiversity."

From point 4: "BSBI supports the proposal for the preparation of Whole Farm Plans under Tier 1. Indeed, the existence of such Plans is key to the effectiveness of cross-compliance measures."

From point 6:

"...it is not the case that one-size-fits-all management prescriptions work well in biodiversity enhancement due to the need to take local context into account. Hence, to obtain value for money, it is essential that the actions funded are well targeted. Thus, current ecological value and future potential must be assessed by somebody with sufficient ecological training and experience. Changes in habitat (e.g. planting trees into existing grassland) need to be assessed with particular care to avoid public funding being used to damage valuable natural features."

From point 7:

"The merits of protecting and enhancing a wide range of habitats get downplayed by the attention given to tree planting and peatland restoration...".

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.:

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,

Not Answered

Please explain your answer in the text box.:

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.:

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?

Not Answered

How can the grant scheme support this?:

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.

Are there others not listed above?:

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.:

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.:

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.:

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.:

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.:

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 Answered

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

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

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.:

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.:

See comments at end of document

Combined response to Question 15 and 16

1. Background

1a. The Botanical Society of Britain and Ireland (BSBI) is the premier society in Scotland for the study of our wild flora. Our training and outreach programmes continue to support and develop botanists at all skill levels. Our data informs scientific research and underpins evidence-based conservation. BSBI is a company limited by guarantee registered in England and Wales (8553976) and a charity registered in England and Wales (1152954) and in Scotland (SC038675).

1b. The newly published Plant Atlas 2020 presents an extensive and authoritative analysis of the current status of, and changes to, the distribution of species which reaches the general conclusion that an alarmingly high percentage of our wild species are in decline. Plant Atlas 2020 is available as a summary, in two printed volumes or via on-line investigation, see

<https://plantatlas2020.org/>

The launch press release is available from

https://bsbi.org/wp-content/uploads/dlm_uploads/2023/03/BSBI-Plant-Atlas-2020-press-release-Britain-FINAL.pdf

1c. Botanical Society of Britain and Ireland Committee for Scotland (BSBI CfS) welcomes the opportunity to contribute to the development of the Forest

Grant Scheme (FGS). We welcome the general intention of increasing forest/woodland cover in Scotland, but hope that this will be done with greater recognition of ecological sensitivities than has often been the case in the past.

1d. Through its distributed network of vice county recorders, which collectively spans the whole of Scotland, BSBI is uniquely well placed to inform the debate about the ecological impacts of commercial forestry and woodland tree planting.

1e. BSBI CFS recently consulted recorders for vice counties in Scotland to gather their collective experiences for the ongoing Royal Society of Scotland inquiry into public support for tree planting and forestry. The collation of stated experiences forms the basis of the following comments, comprising general statements supported by case studies. We appreciate that some of these comments may be more directed towards the operational end of forestry than sought by the current FGS consultation. Nevertheless, we hope this informed critique of the current and past grant support systems will be used to guide improvements in the Future Grant Support for Forestry and associated implementation mechanisms.

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?:

See comments at end of document

Small scale mixed land use?:

See comments at end of document

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

Please add your comments here.:

2. Woodland/forest planning and design

2a. BSBI vice county recorders have considerable reservations about the extent to which woodland/forest design is adequately informed by knowledge of the habitats and species affected. Without such knowledge, it is difficult to see how informed decisions can be taken to mitigate against negative consequences of proposals.

2b. Through its network of vice county recorders, BSBI has amassed a Distribution Database (DDb) of unparalleled quality and coverage regarding the distribution of higher plants in Britain and Ireland. Similarly extensive data sets are available for other species groups. We encourage Scottish Forestry to work with BSBI (and other data providers) to develop streamlined systems to search for and report on known sensitivities, then to make use of these systems compulsory.

2c. Despite the considerable extent of data available, the majority of land units in Scotland have not been, and for some time yet will not be, surveyed in detail by botanists. To avoid accidental damage to the extent and quality of established habitats, Phase 1 habitat surveys of the land affected (which may extend beyond the planting envelope), informed by the results of searches of existing data sets, should become the default rather than the exception. Payment for surveys to a specified

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standard should become part of the scheme. This would address a concern of vice county recorders that at present applicants could tick a box saying "No implications for Biodiversity", without any accompanying evidence.

2d. The statement "All forests and woodlands can deliver positive outcomes for nature and the FGS has made a valuable contribution to achieving this goal." (FGS Consultation, P20, final para) surely needs qualification. There are many places where creation of forests and woodlands would damage important existing habitats. The only way to reduce the risk of this happening is to improve the data available along the lines of 2c above. In order for FGS to make a meaningful contribution to halting the loss of biodiversity, it should encourage well-designed schemes with biodiversity enhancement as their principal purpose.

2e. Information about tree planting proposals posted for consultation by Scottish Forestry are not always adequately specified. For example, a vice county recorder working with a Scottish Wildlife Trust Local Group found the application to restock a forestry block at Scotstown Moor Local Nature Reserve in South Aberdeenshire contained an area labelled as "mixed broadleaves". It took an enquiry for further information, relayed by Scottish Forestry to the applicant, to establish that the mixed broadleaves contained 30% Sycamore (*Acer pseudoplatanus*), a non-native species which seeds vigorously and should be considered inappropriate in a Local Nature Reserve.

2f. There is a general feeling amongst BSBI vice county recorders that forestry applications are too often considered in isolation, rather than strategically in combination with nearby applications already approved and those that may be yet to come. The effect of this is felt most acutely in areas like the Ochils where the proportion of forested ground is becoming increasingly high.

2g. Large-scale planting of trees of whatever species mix and density does not immediately create an ecological woodland. Whilst some mobile species from different taxonomic groups may spread quickly into and within newly planted areas, many species of woodland plants are poor colonisers, so unless refugia are present nearby the time scales to colonisation may be very long. If Scottish Forestry aims as we would hope to create ecological woodlands, then it would seem appropriate: (i) to provide grant aid to speed up colonisation by ground flora from local seed sources; (ii) to provide grant aid for projects which spread tree planting across decades (including by natural regeneration) rather than the traditional mass-plantings; (iii) to encourage applications to recreate woodland habitats that are particularly scarce (e.g. high altitude native woods) or to establish native tree cover on sites for which the ground flora suggests have been woodland in the recent past.

3. Environmental Impact Assessments

3a. Many BSBI vice county recorders have expressed dissatisfaction with EIAs, their concerns relating to:

- the low frequency with which they are done (3b);
- the experience and abilities of the assessors (3c);
- the scope of the assessments (3d);
- the inability of the EIA process to predict and widespread self-seeding (3e); and
- the inaccessibility of EIAs to the general public (3f).

Concern has also been expressed by BSBI vice county recorders about the role played by Scottish Forestry as the authority to approve schemes (outside of designated sites) in the presence of political pressure to ensure some 18,000 ha per annum gets planted in Scotland.

3b. On frequency, it would appear EIAs are only required when legally protected sites are affected. However, many forestry proposals affect designated

species and priority habitats, but if these are not subject to legal protection then production of an EIA is not a requirement (and, in the absence of use of species distributional data and a Phase 1 habitat survey, the presence of designated species and priority habitats will not be known).

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3c. On experience and abilities of some of the individuals and organisations that undertake EIAs, here are two quotes from a long-standing vice county recorder:

"My experience of EIAs developed by others is that rather too frequently it is obvious that the surveyor has very limited experience of botanical work/identification."

"Too many times, species information is not sufficient, with common and well-known species being included, where scarce or rare ones are not mentioned or are not seen/recorded."

It is possible that limited botanical experience may also be an issue for some staff in Scottish Forestry, who face the difficult task of assessing the quality and consequences of EIAs amongst their other roles, and so would benefit from a reliable and high standard of botanical/habitat survey as part of EIA submissions.

3d. On scope, it should be taken as read that EIAs cover the land likely to be affected by the planting, rather than just the footprint of the scheme in hand. However, it is not entirely clear to what extent external effects are properly assessed.

Case study: The Glen Dye Moor Project <https://glendyemoor.com/> is proposing large scale woodland creation, including native species and commercial crops. The largest Kincardineshire population of the locally rare Lesser Bladderwort (*Utricularia minor*) occurs outside the project area but in a mire fed by spring water from within the project area. This has been notified in a consultation response, but it is doubtful whether this mire would otherwise have been covered by the associated EIA.

3e. The wide scale problem of self-seeding by exotic tree species (see 5 below) suggests a systemic failure in the EIA process: either too few EIAs have been performed; or significant misjudgements have been made by those conducting EIAs; or the footprint of ground covered by EIAs has not extended far enough; or most likely some combination of the above has occurred. Whatever the cause, remedial action to the EIA process would seem to be required.

3f. On the inaccessibility of EIAs to the general public, given that public funding is at stake, it is surprising to hear BSBI recorders stating that the presence of EIAs is not widely advertised and the reports themselves are not made easily available.

4. Impacts of large-scale afforestation

4a. The geographic variation in extent of large-scale planting is marked, with some vice county recorders reporting very little whereas others in the Southern Uplands and Western Highlands reporting 25% to 30% of land being already afforested with considerable pressure for more to come.

4b. The initial effect of well-sited, large-scale plantings is usually to reduce the extent of widespread upland, moorland and mire habitats and population sizes of associated species. Although undesirable amongst those who give high priority to nature conservation, whether this is a problem is debatable. However, as the process continues, formerly widespread habitats become increasingly fragmented and their associated species increasingly scarce until they eventually disappear. The few remaining areas of semi-natural habitat then seem to attract forestry schemes as they are of low economic value and grants are available to plant them, destroying the habitat, rather than informed decisions being made to recognise their ecological value (often comprising UKBAP priority habitats) and providing grant aid for traditional low intensity agriculture to protect these few remaining areas.

Case study: At Cummings Hill, a commercial forestry plantation planted in 2022, destroyed 100 ha of lowland heathland, the largest remaining extent of this UKBAP priority habitat in Roxburghshire.

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This involved direct planting on the last site for Petty Whin (*Genista anglica*) in the county which will certainly cause this species to become extinct in Roxburghshire within a few years.

Case study: Alpine Rush (*Juncus alpinoarticulatus*) has fared especially badly in the Borders with at least fifty percent of the populations in Roxburghshire and Selkirkshire becoming extinct as a result of blanket afforestation. These Border populations are the only ones between Upper Teesdale and the Scottish Highlands, see <https://bsbi.org/maps?taxonid=2cd4p9h.19e>.

The major decline of Alpine Rush gives a good indication of the effects of commercial forestry in the Borders area.

5. Controlling the negative impacts of self-seeding

5a. County recorders report that self-seeding of exotic tree species, whether conifers or broadleaves, is a widespread problem. This is exemplified by the fact that the highest known altitude for any tree in Scotland is now a Sitka Spruce seedling found growing at 1,233 m asl.

5b. Although most often associated with Sitka spruce, for which a factsheet is available on the Non-Native Species Information Portal <https://www.nonnativespecies.org/non-native-species/information-portal/view/2698>, impactful levels of self-seeding have been observed by BSBI vice county recorders across a wide range of species including Norway Spruce (*Picea abies*), Western Hemlock-spruce (*Tsuga heterophylla*), Douglas Fir (*Pseudotsuga menziesii*), Larch spp. (*Larix*) and Noble Fir (*Abies procera*) amongst conifers, also Beech (*Fagus sylvatica*) and Sycamore (*Acer pseudoplatanus*) amongst broadleaved species.

5c. Planted trees and their self-seeded successors do provide a habitat for epiphytes, though the species mix of epiphytes depends on the chemical and physical properties of the bark on which they grow. Whilst this is undoubtedly a gain, the feeling amongst BSBI recorders is that such gains are rarely equivalent to the associated losses.

5d. Self-seeding of exotic tree species affects unplanted habitats both within and outwith the wooded / afforested envelope, where "outwith" can extend to several km from the nearest seed source.

5e. The range of unplanted habitats negatively affected by self-seeding is wide and includes existing native woodland (e.g. Knapdale Woods SAC in Kintyre) as well open habitats such as grasslands and moorland.

5f. Scottish Forestry needs to lead the forestry industry in addressing the problem of self-seeding by exotic species, through tackling the problem as it currently stands combined with urgent investment in the development of genetic lines which self-seed either poorly or not at all.

5g. Until the breeding research has been conducted and scaled up, the precautionary principle should require all new planting proposals to contain an assessment of the potential for self-seeding and an enforceable action plan to deal with the negative consequences of self-seeding on surrounding habitats.

Case Study: Near Eskdalemuir in Dumfriesshire areas of deep peat have been left within plantations such as at Loch Rig and Bellstone Bottom, but these are being self-seeded into, threatening the long-term survival of important populations of bog species such as Northern Deergrass (*Trichophorum cespitosum*, classified as Nationally Scarce and locally rare) and Tall Bog Sedge (*Carex magellanica*, classified as Nationally Scarce).

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Case study: Colonisation of raised peat bogs by conifers in southwest Scotland requires repeated removal of seedlings/saplings every year or so, even on designated sites such as Carsegowan Moss Site of Special Scientific Interest in Wigtownshire and Kirkconnell Flow National Nature Reserve in

Kircubrightshire.

6. Recognising the ecological benefits of large herbivores

6a. Several statements in the FGS consultation document cover combating overgrazing which is widely recognised to be a problem. However, there appear to be no corresponding statements about combating undergrazing which can be extremely detrimental to botanical diversity.

6b. In the short term, the practice of leaving the best examples of natural habitat unplanted within an afforested area leaves them unaffected, which is encouraging. However, the erection and maintenance of fences to exclude large herbivores leads to a long-term loss of plant species diversity in many habitats as the reduced levels of grazing and disturbance result in the most competitive species coming to dominate and the less competitive species dying out.

Case study: In the valley of the Douglas Burn, Selkirkshire, NT24.28., blanket planting of Sitka Spruce and subsequent lack of grazing has resulted in the extinction of colonies of Hairy Stonecrop (*Sedum villosum*, classified as Nationally Scarce on account of the number of 10 km squares it occurs in and as Near Threatened in Great Britain using IUCN criteria) and Pale Forget-me-not (*Myosotis stolonifera*, classified as Nationally Scarce).

Case study: At Heron Hill, Hawick, Roxburghshire, NT51.14., a population of Northern Hawk's-beard (*Crepis mollis*; included in the Scottish Biodiversity List, also classified as Nationally Scarce and as Endangered in Great Britain using IUCN criteria) has been overwhelmed by commoner dominant plants and hence lost following a herb-rich slope being fenced off for woodland tree planting.

6c. BSBI CFS encourages consideration of how open ground might be made eligible for management under alternative funding schemes in order to retain or better still enhance the quality of established habitats including their plant communities and associated wildlife.

7. Invasive non-native species (INNS)

7a. Forest rides seem to act as the arrival point for some species to areas in which they have not been previously recorded. These arrivals have likely been facilitated by vehicles conducting forestry operations, which is seemingly at odds with the desire for heightened biosecurity in commercial forestry.

Case study: Trailing tormentil (*Potentilla anglica*) was first discovered in Kincardineshire along a ride in Drumtochy Forest over a kilometre from the nearest road. There is only one record from an adjacent vice county (Angus) some 50 km distant.

Case study: In North Aberdeenshire, the only known sites for Slender Rush (*Juncus tenuis*) are along tracks in Clashindarroch Forest and The Bin Forest, both near Huntly.

7b. Whilst it is commendable that forest rides are open to, and often well-visited by, the general public, some such rides are likely to be acting as distribution points for non-native invasive species (INNS) in the absence of remedial action by forest owners / managers.

Case study: In Blackhall Forest, Kincardineshire, owned and managed by Forestry and Land Scotland, the well-walked forest rides have been colonised by the neophytes Two-spined Acaena (*Acaena ovalifolia*, a close relative of *Pirri-pirri-burr*, *Acaena novae-zelandiae*) and Large-leaved

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Avens (*Geum macrophyllum*). Both plants have seeds with hooks that attach to clothing and dog fur and are spreading locally.

7c. Given the above, BSBI CFS wonders whether sufficient prominence is given to INNS in the promotion of FGS and assessment of applications for funding under FGS.

8. Impact of shading

8a. Shading has a massive effect on the ground flora, hence any assessment of tree planting into natural habitats needs consider the long-term effects of shading which is primarily a function of tree species and planting density.

8b. For planting at any given density the most negative impacts are associated with Sitka Spruce (*Picea sitchensis*) amongst conifers and Beech (*Fagus sylvatica*) amongst broadleaves, well-developed stands of which are often completely devoid of ground vegetation. Hence it is difficult to see how biodiversity losses in densely shaded areas can be offset by associated biodiversity gains.

8c. Even the native Scots Pine, when planted at a density favoured by foresters, can lead to the loss of the majority of plant species initially present, as documented from a diverse heathland site near Crathie, South Aberdeenshire in Welch D. & Scott, D. (1997) Decline of Moorland Plants Following the Establishment of a Scots Pine Plantation, *Botanical Journal of Scotland* 49, 27-37.

8d. Thinning operations seem to be carried out much less frequently than previously or not at all, in part due to avoidance of windthrow but perhaps in part due to cost reduction. This decline in thinning is regrettable since decreased levels of light below forestry/woodland canopies seem to be associated with reduced diversity of higher plants.

8e. BSBI CFS believes more careful consideration of the long-term consequences of shading is required, particularly where nature enhancement is a primary aim of new planting.

9. Impacts of drainage

9a. Drainage associated with commercial forestry has an impact not only where the drains are created but also on plants growing by watercourses affected by the drainage.

9b. BSBI CFS believes more careful consideration of the off-site as well as on-site consequences of drainage operations is required, particularly where important habitats or species are affected.

Case study: In Selkirkshire, the scouring of the banks of the Tima Water from flash floods aggravated by the ditching and extreme run-off from blanket conifer planting has removed the habitat of Alpine Rush (*Juncus alpinoarticulatus*; classified as Nationally Scarce).

Case study: Also in Selkirkshire, the aquatic Quillwort (*Isoetes lacustris*) has been lost from Shaws Under Loch, Hyndhope Forest, Ettrick, NT39.19. following silting from water carried by ditches constructed to facilitate blanket afforestation by Sitka Spruce.

Case study: Aberdeenshire Council has declared Local Nature Conservation Sites (LNCS) with input from a panel of experts, including a BSBI vice county recorder, and consults these experts about relevant development applications and forestry proposals. One such forestry proposal threatened a mire within the Hill of Towanreef / The Buck LNCS, one of only two known sites in North Aberdeenshire for Bog-sedge (*Carex limosa*). By ensuring not only that the drainage into the mire was unaffected but also by changing the layout of fences to allow continued access of large herbivores to the mire, BSBI hopes to have increased the likelihood that this population of Bog-sedge will survive in the long term.

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10. Impacts of vehicular access

10a. Often, because of the high light levels, tracks and roads are the most diverse botanical sites in commercial forests. It is disappointing then to hear about the damage caused to botanical communities due to scraping and widening to facilitate timber extraction, although no reports of damage to important population plant populations have been made as a result.

10b. The access-related impacts of commercial forestry extend beyond the forestry operations themselves to the supporting infrastructure. In Kirkcudbrightshire, the largest colony of Adder's-tongue (*Ophioglossum vulgatum*) was destroyed by the resurfacing of a disused railbed to facilitate timber haulage. We were unaware of any official public announcement of this "improvement" beforehand.

10c. Whilst recognising that vehicular access is essential for forestry operations, BSBI CFS believes a desk-based search for ecological sensitivities be conducted along the lines of 2b early in the planning stages of major changes to access routes.

11. Access to land on foot

11a. BSBI vice county recorders have reported difficulties of access posed by commercial forestry and woodland creation schemes. In order for the flora of each vice county to be described, it is essential that recorders be able to gain access to the land. Such access is required firstly to discover and monitor changes to populations of unusual species and secondly to record and describe changes in the distributions of more common species. Whilst the access legislation in Scotland is helpful in this regard, the continuing erection of deer fences with many kilometres between crossing points is inhibitory, as is the enclosure of unplanted blocks of land without tracks or paths leading through them.

11b. We encourage Scottish Forestry to initiate strategic discussions to decide what level of provision of access is reasonable, not only for BSBI vice county recorders but for others with legitimate reasons to visit the land, then use such mechanisms as are available to achieve this level of access.

12. Use of native trees grown from seed of local provenance

12a. Given the wide variation in the growing environments in different parts of Scotland, and the potential for local adaptation by species associated with native trees, the precautionary principle has been used in the past to suggest that tree planting for nature should as far as possible use trees of native species from local seed sources rather than long-distance translocation.

12b. There are good examples of where tree planting has used native species of local provenance. One such example comes from Orkney, where the isolated geography and atypical climate make the case for using local seed sources particularly strong, but add layers of additional complexity and preparation to the conduct of tree planting schemes.

12c. Whilst climate change adds an additional factor for consideration, it should be noted that BSBI data show the current distributions of all the main tree species native to the Scottish lowlands extend to the south of England. See <https://plantatlas2020.org/atlas/2cd4p9h.1y5> for Pedunculate Oak (*Quercus robur*) and change the name in the top left-hand corner for other species. Hence any suggestion that the planting of tree species that are not native to Scotland is required to mitigate the effects of climate change on tree survival and woodland establishment, in the context of commercial forestry, would seem to be unnecessary.

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12d. Further research is required to establish whether trees grown from seeds of local provenance in Scotland are likely to be disadvantaged by climate change, and if so what genetic inputs are required from elsewhere to expedite adaptation to climate change and novel diseases. Until this has been undertaken, publicised and generally accepted, BSBI Cfs encourages Scottish Forestry to continue to promote the use of native trees grown from seed of local provenance when tree planting has nature conservation as a principal objective.

Appendix 1. BSBI response to the Scottish Government Consultation "Delivering our Vision for Scottish Agriculture: Proposals for a new Agriculture Bill" General

The Botanical Society of Britain and Ireland (BSBI) is the premier society in Scotland for the study of our wild flora, with a network of expert plant recorders which collectively spans the whole of Scotland. We are now one of the world's largest contributors of biological records: our data informs scientific research and underpins evidence-based conservation. Our training and outreach programmes continue to support and develop botanists at all skill levels.

BSBI believes the protection and enhancement of the Scottish flora is important:

- in its own right, as a key component of our natural heritage;
 - because of the underpinning role it plays as habitat and primary producer for other organisms;
 - for its role in delivering the ecosystem services on which the people of Scotland depend, including provision of food, clean air, clean water and m
- [answer truncated to 25000 characters]

About you

What is your name?

Name:

Botanical Society of Britain and Ireland Committee for Scotland (BSBI Cfs)

What is your email address?

Email:

[Redacted]

Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:

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

Publish response with name

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