

# Environmental Targets

## CONFOR RESPONSE TO THE DEFRA CONSULTATION

### Introduction

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#### *About Confor*

Confor ([www.confor.org.uk](http://www.confor.org.uk)) is the not-for-profit organisation for the UK's sustainable forestry and wood-using businesses. It has 1,500 member companies, representing the whole forestry and wood supply chain from seed to structure.

#### *About this consultation*

Government is seeking views on the first suite of Environment Act 2021 targets. The Act requires that at least one target in each of four priority areas is set in: air, water, biodiversity, and resource efficiency and waste reduction. It also requires targets to be set for fine particulate matter (PM2.5) and species abundance.

Government is proposing targets that will lead to action in areas that drive environmental outcomes where we face some of greatest threats and pressures. They are considering targets over and above the minimum required, with additional proposals in biodiversity, water, marine and tree planting.

Confor welcomes the opportunity to respond to this consultation. Not all the questions have been answered as Confor believes that there are fundamental underlying principles that must be addressed first. Therefore, Confor has chosen not to submit a response online and requests that Defra accept this document as Confor's formal response.

This response has also been informed by the positions and themes agreed by a convened cross-sector group comprising, alongside Confor, the Institute of Chartered Foresters, The Woodland Trust, The Country Land and Business Association, The Small Woods Association, The Royal Institute of Chartered Surveyors, and the Royal Forestry Society. From just two meetings we have a wealth of expertise and ideas about the challenges and opportunities for supporting the government's ambitions for nature and we would urge Defra to engage with us on this.

### Consultation questions

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#### **Q1. What is your name and correspondence address?**

Caroline Ayre: [caroline@confor.org.uk](mailto:caroline@confor.org.uk)

#### **Q2. Would you like your consultation response to be confidential? If you select 'yes,' please give your reason.**

No

#### **Q3. Please tell us in what capacity you are responding to the consultation by selecting from the following:**

Sector trade body or membership organisation

**Q4: If you are responding on behalf of an organisation, what is its name?**

Confor: Promoting forestry and wood

**Q5: Do you agree or disagree that the proposed combination of biodiversity targets will be a good measure of changes in the health of our 'biodiversity'?**

Due to the impact of climate change and changes to land-use policy, and the fact that the abundance of one species can impact the abundance of other species, it is too simplistic to aim for all priority species to become more abundant. There will also be local considerations which mean that seeking an overall increase in abundance at the national level is more sensible than a blanket focus on increasing abundance wherever a species exists currently or could exist locally. Pragmatism/flexibility needs to be provided to ensure that a simplistic approach does not cause unintended negative consequences.

**Q6: Do you agree or disagree with the level of ambition of a 10% increase proposed for the long-term species abundance target?**

This is a simplistic approach and does not take into account the points made above. The objective should be to halt declines and increase abundance, but that needs to be monitored and aspirations recalibrated where it is sensible to do so for the purposes of achieving the intended outcomes and recognising potential negative impacts on other targets, e.g., removing carbon from the atmosphere or food and wood fibre production.

**Q7: Do you agree or disagree with the ambition proposed for the long-term species extinction risk target to improve the England-level GB Red List Index?**

No comment.

**Q8: Do you agree or disagree with the level of ambition of 'in excess of 500,000 hectares' proposed for the long-term wider habitats target?**

Confor agrees with the level of ambition but disagrees with the definition of 'wildlife-rich' as far as woodlands are concerned. It is clearly stated that 'wildlife-rich' habitats are ones that have 'value for biodiversity'. The list, among others, includes native woodlands and other habitats with trees - hedgerows, scrub, and orchards. But makes no mention whatsoever of mixed-species productive woodland, which will contain native trees/woodland and ground protected and managed for biodiversity. Mixed species productive woodlands can include high biodiversity value, including for priority species, see Confor's 2020 'Trees, Biodiversity and Wood' report<sup>1</sup>. It is crudely over-simplistic and wrong to exclude sensitively managed productive woodlands – we question what the evidence is for this. Doing so will miss valuable opportunities to support biodiversity and the aims of this legislation.

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<sup>1</sup> Confor, *Biodiversity, Forestry and Wood*. <https://www.confor.org.uk/media/247794/confor-biodiversity-forestry-report.pdf>

In England, there is more existing woodland than any new planting scheme could create, but only about 20% of our broadleaf (or native) woodlands in England are managed, with the majority being in a degraded state that makes it very difficult to realise any biodiversity gains. The Woodland Ecological Condition survey<sup>2</sup> shows almost all of England's existing native woodland lacks deadwood, veteran trees, or open space; around half is damaged by browsing animals and/or too small to be ecologically viable. If we manage our woods better, we can deliver huge benefits for nature while also reducing atmospheric carbon, because established trees, when thinned, soak up carbon more quickly than newly planted ones and immediately improve biodiversity (with the added benefit of being more accessible and appealing for recreational purposes). However, the long history of under, or no, management of our broadleaf resource has resulted in a resource that is of poor quality in terms of timber production. The loss of potential income realised has a knock-on effect in delivering costly biodiversity-focused woodland management.

The restoration of habitat must also ensure that there is no net loss of woodland cover in England, including productive woodland. Confor has repeatedly asked for no net loss of productive woodland in England, and this is now even more significant as government forecasts show that wood supply will decline in the coming decades, driving up imports and putting more pressure on fragile forests overseas. While biodiversity overseas is outside the scope of this consultation, it is morally wrong to endanger biodiversity overseas by taking narrowly focused land-use decisions in England. Moving forward, Confor believes it is imperative that further clearance of productive woodland is compensated for by planting of new productive woodland within the locality of the market for the wood that is lost, and that, unlike now, the new woodland planting is identified before clearance takes place to avoid it simply being lost as a condition over time.

Decisions on any further deforestation for habitat restoration should also take into consideration the ability of the woodland to support key species through effective management, such as thinning, restructuring, or supplementary planting, rather than removal – the judgement should be made on the potential of the woodland, not its current condition which is often the result of planting when there were few standards, whereas now detailed standards provide for multi-purpose management, including biodiversity benefits. Deforestation should be the last resort.

**Q9: Do you agree or disagree that all wildlife-rich habitat types should count towards the target?**

Confor agrees but this question is set entirely 'in the negative' - what don't you think should be included in the target? All the habitats should be included, plus, mixed species productive woodland. These woodlands include a vast range of types and different values for biodiversity, so if Defra must qualify 'productive' by saying 'well managed' or 'sensitively managed' then do so, but you cannot reasonably simply omit all types of productive woodland altogether.

**Q10: Do you agree or disagree with the level of ambition proposed for the Marine Protected Area target?**

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<sup>2</sup> Forest Research, *National Forest Inventory: Woodland Ecological Condition*.  
<https://www.forestresearch.gov.uk/tools-and-resources/national-forest-inventory/what-our-woodlands-and-tree-cover-outside-woodlands-are-like-today-nfi-inventory-reports-and-woodland-map-reports/nfi-woodland-ecological-condition/>

No comment.

**Q11: Do you agree or disagree with the level of ambition proposed for an abandoned metal mines target?**

No comment.

**Q12: In addition to the proposed national target, we would like to set out ambitions for reducing nutrient pollution from agriculture in individual catchments. Do you agree or disagree that this approach would strengthen the national target?**

No comment.

**Q13: The target needs to allow flexibility for water companies to use best available strategies to reduce phosphorus pollution, including the use of nature-based and catchment-based solutions. Do you agree or disagree that the proposed target provides this flexibility?**

Agree.

**Q14: Do you agree or disagree with the level of ambition proposed for the nutrient targets?**

No comment.

**Q15: Do you agree or disagree with the level of ambition proposed for a water demand target?**

No comment.

**Q16: Do you agree or disagree with the proposed metric for a tree and woodland cover target?**

Confor disagrees. 0.5ha is 1.2 acres so you could be missing many small sites using this metric. The condition for sites under 0.5ha should be that they contain zero open space apart from areas of naturally accruing open canopy such as windblow which would naturally close.

**Q17: Do you agree or disagree that short rotation coppice and short rotation forestry plantations should be initially excluded from a woodland cover target?**

Confor agrees and disagrees. We can see the logic in excluding SRC in that the rotations are short and really amount to temporary, usually single species woodland, something more akin to an agricultural crop. These are not normally UKFS compliant. On the other hand, this could be a way of introducing some farmers to the idea of trees and woodland on their land, and in some cases, what was originally intended as SRC does not get cut on schedule so actually ends up quite an interesting habitat.

With SRF the situation is considerably different because, with a rotation length of 20-25 years real woodland conditions will certainly have developed, with several different 'stages' along the way and all that that means in terms of biodiversity. In addition, treated and designed in the right way, and with the right species, in an agroforestry system, the majority poorer stems could be harvested for woodchip, or the domestic firewood trade, and the better stems retained at a wide spacing to grow on to timber.

SRF can also be grown, in a UKFS compliant scheme, to substitute for the consumption of construction grade timber in biomass (woodchip) systems and to supply small dimension wood for wood panel

production. Growing SRF, especially in the short term, e.g., the next 30-40 years, will help England/the UK avoid increasing imports of wood (and an expected increase in the threat to fragile global forests). From the 2060s it is forecast that supplies of home-grown wood will increase once more.

The Sixth Carbon Budget published by the Climate Change Committee reports that, to achieve net zero by 2050, the UK will need to plant 440,000 hectares of mixed woodland and a further 260,000 hectares of agricultural land will need to shift to bioenergy production (including short rotation forestry). The report assumes that, by 2050, one-third of agricultural land should be freed up (as a result of reduced production through behavioural change and more efficient farming practices), while 25% of the UK land area will need to be forested, up from 15% today<sup>3</sup>

This is land use change on a very large scale that can only be achieved through intensified engagement with the farming community, land managers in general and the next generation of farmers, foresters, and growers. Mass land use change will affect the current and future land managers, this generation needs to implement the change, but the next generation to manage it. Therefore, the education of the next generation needs to change to account for elements such as biomass production and agroforestry. The current silo teaching needs to be updated. This has to happen in schools so the entire school-age population can see and understand the need and impact these changes will have on the country and the world.

Clarity in policy and reassurances about long-term public funding are also indispensable to generate this level of change. Woodland creation must become an appealing choice for farmers: DEFRA and Forestry Commission must concentrate their efforts on making good advice available and the woodland creation process more accessible and efficient than it is now. Part of the appeal will certainly come from the prospect of woodland bringing additional income streams to farms, so once again it is imperative that policy encourages multifunctional woodland that delivers environmental, nature, economic and social benefits.

**Q18: Do you agree or disagree with the proposed inclusion of trees in woodlands, as well as trees in hedgerows, orchards, in fields, and in towns and cities?**

Confor agrees if they are separable in the data fields so that information is easily interrogated. In addition, any increase in these types of 'tree cover' should not be at the expense of increases in larger woodlands. This because, despite the importance of individual trees, etc, large woodlands combine a lot more forest functions than you can achieve in a small woodland or by individual trees.

**Q19: Do you agree or disagree with our proposed level of ambition for a tree and woodland cover target?**

Nowhere in the consultation does it mention the products that increased woodland cover can provide. There is no evidence of any production forecasting or economic modelling, or recognition of the role harvested wood products play in reaching net zero, as follows:

- Using more timber products will have a positive difference for a more sustainable built environment, enabling it to contribute towards net zero.

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<sup>3</sup> <https://www.theccc.org.uk/publication/sixth-carbon-budget/> p. 25

- Using more wood also encourages a flourishing forestry industry which means more trees are planted, grown, and managed in a sustainable way.
- Each 1m<sup>3</sup> of wood grown by a tree holds 0.9 tonnes of CO<sub>2</sub> ‘sequestered’ from the atmosphere. Research has proven that conifers, as they grow faster, also absorb more carbon more quickly, and store it through long-life uses<sup>4</sup>.
- Mature trees are harvested, and their carbon is captured and stored in buildings and other wood products.
- Wood products carry that stored carbon, captured from CO<sub>2</sub> in our atmosphere, for its entire life.
- Using wood instead of other materials saves CO<sub>2</sub> emissions, both through the carbon captured and stored in the wood product and the avoidance of using alternative CO<sub>2</sub>-intensive materials.
- The manufacture of traditional materials such as steel or concrete creates very substantial CO<sub>2</sub> emissions. Meta-analyses of the average impact of using wood instead of concrete suggest an average reduction of 2.1 tons of carbon dioxide emissions per one ton of wood products used compared to concrete.
- Using wood in construction is a cost-effective solution to carbon capture. There is no need for man-made carbon capture technology to 'offset' carbon emissions when using timber.
- Timber products can be protected with additional treatments, repaired, reused, and recycled numerous times before they are at the end of their life. For example, a timber pallet could be repaired up to twelve times before it is turned into wood chips that can then be used to create a chipboard panel that may be used in construction - a wood product is easily recycled and reused, allowing the carbon it stores to stay 'locked away' for many years.
- We can keep planting more trees to replace wood products - and every tree planted captures more CO<sub>2</sub>. In other words, such behaviour is truly sustainable, and can be continued into the indefinite future, enhancing rather than harming the planet’s resources – unlike the vast majority of current commercial activities.

It is vital to remember that achieving net zero will also help protect biodiversity, here and overseas. Productive woodland and increased wood production will provide places for biodiversity and provide part of the global solution to tackling climate change and biodiversity loss.

There must be a recognition that timber is produced from trees and the UK is the second largest net importer of timber globally behind China. Where will our domestic timber come from to meet the increased demand forecast over the next 20 years?

Confor agrees with the level of ambition. But as mentioned above, ensuring that there is public funding to support long-term management of woodlands will be key to nature recovery and biodiversity improvement. It would be more beneficial to have targets for tree “establishment” rather than planting, as this would focus all the attention and funding on ensuring new woodland is viable in the

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<sup>4</sup> Forster, E.J., Healey, J.R., Dymond, C. *et al.* (2021) Commercial afforestation can deliver effective climate change mitigation under multiple decarbonisation pathways. *Nature Communication* **12**, 3831 (2021). <https://doi.org/10.1038/s41467-021-24084-x>

long term and, therefore, well-managed, protected from damage from grey squirrel and deer, and inclusive of productive elements (short or long rotation).

Carbon markets are an important driver for land use change, as are biodiversity and nature recovery targets. The 2021 Sylva Foundation's British Woodland Survey<sup>5</sup> showed that biodiversity and nature recovery are the main priorities for private woodland owners, but the only ones to create woodlands that are good for wildlife and biodiversity are those which also include timber production among their desired outcomes. Woodland owners want to help nature, but it is often wood production which provides the management plan and the income to deliver that benefit. For example, a review of woodland created over the past 20 years in the South West Forest<sup>6</sup> found that owners were unaware of the importance of active management and their woods were not providing an income stream, resulting in these young woodlands falling into disrepair and reduced benefits for biodiversity. We argue that economic modelling on all aspects of targets is essential and currently there is not enough of it to help inform decision making. Even in the evidence papers (published as late as 28<sup>th</sup> April 2022, only eight working days before the consultation's deadline), there seems to be no genuine economic assessment of the needs and drivers of woodland creators, implying that the taxpayer will have to shoulder the majority of the cost to deliver the objectives of these policies for the foreseeable future.

Therefore, it is crucial that any targets and policies leave behind the false dichotomy between native and productive woodland. Any new woodland created according to the UK Forestry Standard and managed by skilled forestry practitioners will deliver multiple benefits that are fundamental to achieve the net zero and nature recovery outcomes the Government is committed to, without necessarily placing any additional burdens on the taxpayer.

The tree target must not just focus on quantity but also quality. It must ensure new woods are high quality.

**Q20: Do you agree or disagree with the proposed scope of the residual waste target being 'all residual waste excluding major mineral wastes'?**

No comment.

**Q21: Do you agree or disagree that our proposed method of measuring the target metric is appropriate?**

No comment.

**Q22: Do you agree or disagree that local authorities should have a legal requirement to report this waste data, similar to the previous legal requirement they had until 2020?**

No comment.

**Q23: Do you agree or disagree with the level of ambition proposed for a waste reduction target?**

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<sup>5</sup> Sylva Foundation, *British Woodland Survey*. <https://www.sylva.org.uk/bws>

<sup>6</sup> Diverse Regeneration Company, *Review of new planting under the South West Forest scheme*. <https://www.drcompany.co.uk/wp-content/uploads/2020/06/SW-Forest-Review-2020-minus-appendices-1.pdf>

No comment.

**Q24: Do you agree or disagree with our proposed metric for considering resource productivity?**

No comment.

**Q25: Of the possible policy interventions described, which do you think will be most effective to meet a resource productivity target?**

No comment.

**Q26: Do you agree or disagree with the level of ambition proposed for a PM2.5 concentration target?**

No comment.

**Q27: Do you agree or disagree with the level of ambition proposed for a population exposure reduction target?**

No comment.