

Petitioner submission of 14 June 2023

PE1812/DDD: Protect Scotland's remaining ancient, native and semi-native woodlands and woodland floors

NOTE 1: This is a report on our meeting on 03/04/23 with three Scottish Forestry (SF) officers which former Minister, Mairi McAllan, offered when she gave [evidence to the Committee on 09/03/22](#).

NOTE 2: SF were provided with a draft of this submission, which we have amended to take account of most of their comments.

NOTE 3: We encourage MSPs to consider joining us on a site visit to the 'spectacular oak woods and waterfall walk' described below.

Self-seeding/wilding invasive non-native (INNS) plantation conifers are "pollution" and "a menace" according to a SF officer. Rural communities face generations of begging for grants to 'bash' rhododendrons, wilding conifers and other INNS infesting their environment (including temperate rainforest and [remnants of Ice Age Caledonian pine woods](#)). According to SF, financial constraints are acting against restoration of Scotland's ancient woodland and we have now reached a situation where "we will have to focus on what we want to save".

Local communities object to the dark monoculture of intrusive new plantations, associated infrastructure and loss of wild and agricultural land. We were told that SF and the logging industry are straining to meet huge new Scottish Government targets to plant more and more conifers. SF officers face protracted negotiations with landowners and forestry agents to secure incremental environmental improvements to new commercial plantation plans that are focused on exploitation and extraction. High staff turnover and loss of experienced employees is condemning Scotland's historic natural identity and biodiversity while putting remaining SF staff under huge pressure to meet the increased targets.

SF has been warning for years that industry favourite conifers like [sitka spruce, lodgepole pine and western hemlock are highly invasive](#).

Invasive species is one of the top five threats to the natural world

according to the [United Nations](#)¹, and yet INNS commercial conifers have a Ministerial Exemption - a 'free pass', it appears, to self-seed and infest Scotland's ancient woodland and wild land. We understand woodland creation is regulated through Environmental Impact Legislation and associated infrastructure through 'Permitted Development'. The UK House of Commons' Environment, Food & Rural Affairs Committee met last year to understand why so much more commercial forestry is being planted in Scotland than England. [Their report](#) states (pg.33-35) one of the main reasons is that a risk based approach prevails in Scotland now, and following the Mackinnon Review, only 2% of afforestation proposals have been subject to "full blown" Environmental Impact Assessments in our country.

Scotland's ancient woodland is still in overall decline, much of it has no special designation and there is no comprehensive and up-to-date inventory, register or catalogue. Despite all the official guidance, codes, laws, standards and other expensive *blah blah blah* that is meant to protect it, without real action, we fear much of our country faces a bleak future succumbing to invasive monoculture and the degradation and decline it brings with it.

Our meeting with SF officers was held at Glenbranter Forest in the Cowal Peninsula at the '*...dramatic route up the Allt Robuic gorge, where native oak woods cloak a series of spectacular waterfalls*'. The site is certainly marketed as a rare gem by [Forestry & Land Scotland](#), but in reality, the gorge and waterfalls are now barely visible and the ancient oaks are all close to death. This once quintessentially Scottish landscape of unimaginable value and wonder has been transformed into a sitka spruce, western hemlock and rhododendron INNS nightmare. Once a place where visitors marvelled at Scotland's natural beauty - now they walk round the carefully maintained bridges and pathways while the purpose for the expensive infrastructure is almost entirely obscured by invasive conifers and rhododendrons. What was once so precious (temperate rainforest and waterfalls) is now lost to us.

One SF officer admitted the situation at Glenbranter was "not desirable", but that he had actually "seen far worse". He said sometimes when the conifers are felled the rhododendron thrives in the new-found daylight

¹ *The five biggest threats to our natural world...and how we can stop them*, Patrick Greenfield and Phoebe Weston, The Guardian, 14 October 2021

and then it completely takes over the land. HTHU² believes this deliberate loss of Scotland's life-giving, colourful, historic natural identity to evergreen INNS monoculture is short-sighted, shameful and heart-breaking.

We were told that restoration costs at Glenbranter's waterfall walk would be around £10k per hectare. The site is steep, work is dangerous and funds are very limited, especially (we were told) as timber prices are currently low. Yet rich landowners and international investors continue their rush to buy up Scotland, out bidding locals, and secure Government grants for forestry infrastructure to facilitate what we now read are [greenwashing plantations](#) to meet annual Government planting targets of around 15,000 additional hectares of what many scientists describe as heat absorbing, peat and soil disturbing, water and habitat degrading INNS conifers on Scottish land. Local people want life-giving [native trees to be planted instead](#).

The SF officers admitted they do not know the scale of the INNS conifer wilding problem in Scotland and said they would be "quickly overwhelmed" if they encouraged members of the public to report sightings to them. In contrast, other Governments around the world woke up years ago and are leading the way, [spending millions to battle the conifers](#).

Academics in Norway at the [Department of Forest Genetics and Biodiversity, Norwegian Institute of Bioeconomy Research](#) state that *'based on spread models and prevailing forestry practices we recommend the establishment of new sitka spruce plantations within 200m of protected areas should be avoided. The problems caused by introduced and invasive species from plantation forestry are suggested to increase over the next upcoming decades'*.

[University of Bergen research from 2012](#) states: *'the main intruder, sitka spruce, is a typical autogenic ecosystem engineer that has the ability to alter the ecosystem by its own size and structure. Sitka spruce is more shade-tolerant and can potentially grow much larger (2-3 times) than the native trees. It has the ability to change the habitat, increasing suitability for its own persistence while, at the same time, reducing the resources available to other species in the community'* (i.e. reducing biodiversity). *We hypothesise that sitka spruce will be a high-risk alien species*

² Help Trees Help Us – on whose behalf this petition has been lodged.

according to the criteria given in the Norwegian blacklist, by reducing biodiversity, degrading habitats and altering ecosystem function’.

HTHU believes planting tens of thousands of hectares more of sitka spruce in Scotland may look good on paper for net zero targets, but, loss of biodiversity and Scotland’s natural identity will be the price we all pay.

We understand Scotland is already a net exporter of timber and one sixth of our country is already afforested. The logging industry has known for 30 years that sitka spruce is invasive and is therefore reducing and working against Scotland’s biodiversity. HTHU urges the Scottish Government to reverse the INNS conifer invasion of Scotland and urgently re-evaluate policy for commercial forestry species selection in our country. If we genuinely are working towards a just transition to net zero and a healthy environment, restoration of Scotland’s life-supporting ancient and native woodland must surely take priority.