

Woodland Trust Scotland
Submission to the Net Zero, Energy & Transport Committee
Scottish Biodiversity Strategy delivery plan
December 2023

Does the draft plan appear fit for purpose to address the biodiversity crisis as it affects Scotland?

Woodland Trust Scotland has responded to the Scottish Government consultation in December 2023, and we are happy to make that response available to committee members. In the interests of brevity we aim to provide short summary of our position here, focussed under the headings set out by the committee.

Woodland Trust Scotland believes the Scottish Biodiversity Strategy and the Delivery Plan should have a focus on 5 key areas:

1. Reduce deer densities
2. Expand native woodlands
3. Improve woodland condition
4. Remove *Rhododendron ponticum* from Scotland's rainforest
5. Help timber forests restore nature

We believe the delivery plan goes some way to delivering these outcomes but as it is drafted we do not think it will deliver the outcomes for nature and climate that Scotland needs to meet its vital and legally binding targets.

There are positives – for example, we believe the list of recognised ecosystems for action is comprehensive. However, many of the actions set out do not meet the “SMART” (specific, measurable, achievable, relevant and time specific) test that should be applied to actions of this type.

To give one example, it is vital that Scotland's Rainforest has clear invasive non-native species eradication strategies including removing *Rhododendron ponticum* from the west coast where the rainforest is situated. A buffer zone around these woodland areas and surrounding habitats is required to ensure catchment scale eradication, with follow-up over at least a decade.

Scotland's Rainforest also needs a clear commitment to a sustainable deer management to allow the rainforest to regenerate naturally, and a clear plan to expand and connect existing areas of core rainforest to double its area through restoration. We do not consider the key actions to be clear enough, or SMART, in this regard.

The action to reduce deer densities is welcome. There are estimated to be around one million deer in Scotland – an unsustainably high number which must be reduced to enable nature restoration. Deer density is one of the main barriers to protection, restoration and creation of native woodland. The Deer Working Group recommendations must be implemented in full. Landscape scale approaches are needed to tackle this problem – and we think it should be a priority right across Scotland, and especially in the Six Large Scale Landscape Restoration areas. There was cross sectoral consensus on this point at the Woodland Creation Summit on 12

December 2023, chaired by the Cabinet Secretary Mairi Gougeon. It is also why we believe these Six Large Scale Landscape Restoration areas should not be limited to land held by Scottish Ministers, and should be open to other land ownership models, with partnership working in the spirit of the Common Ground forum central to the strategic vision of lower deer densities.

We would invite the committee to consider the consultation responses of Woodland Trust Scotland and Scottish Environment LINK for more detail on these questions.

Do you have any concerns that implementation of the plan could have adverse consequences? If so, please set these out.

Other than that the plan lacks SMART actions and may not have an adequately resourced implementation, we see an urgent need for action to tackle biodiversity loss in Scotland and believe this must be a top priority for the Scottish Government. Therefore the adverse consequences of not taking action or delaying taking action to restore nature vastly outweigh any adverse consequences of an imperfect plan.

What matters, other than those set out in the plan, would require to be addressed to ensure that the plan works?

We believe that a lack of financial resource is the biggest challenge. We were very concerned to see woodland creation funding (part of Scottish Forestry's budget) suffer a significant cut in the Scottish Government's 2024-25 budget, particularly given the background of Scotland repeatedly missing targets to create new woodland. We have also called for more targeted funding for Scotland's Rainforest (including a specific Rainforest Restoration Fund) to enable this fragile and invaluable habitat to be restored by tackling deer density, rhododendron and fragmentation, all actions which need to be done at landscape scale. It is vital that the Scottish Government does not deprioritise nature restoration in challenging financial times, as without a healthy environment we cannot long term have a healthy, prosperous, sustainable economy.

The Common Ground Forum has developed some promising progress towards tackling Scotland's deer density problem, but it is vital this continues to receive funding and support if it is to continue to have a positive impact.

We are also very mindful that this strategy and delivery plan are not treated as "standalone" strategic actions – they must fully integrate with other policy areas and legislation including the Land Reform Bill and the Agriculture & Rural Communities Bill and the related post-CAP agriculture payment regime. In that regime we believe that support for agroforestry in all its forms should be embedded in the lower tiers, supporting farmers to develop and enhance nature friendly farming far beyond what is currently allowed under the Forestry Grant Scheme.

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