

COUNCIL FOR NATURE CONSERVATION AND THE COUNTRYSIDE

An Advisory Council to the Department of the Environment

The Statutory Advisory Councils Secretariat, 1st Floor Calvert House,
23 Castle Place, Belfast, BT1 1FY

Tel: 028 9025 4731/Fax: 028 9025 4706

secretariat-hillst@doeni.gov.uk

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David Small
Chief Executive
Forest Service
Dundonald House
Upper Newtownards Road
BELFAST
BT4 3SB

Dear David,

Short Rotation Forestry

A report¹ by LTS International (Feb 2006) was commissioned by the Forestry Commission and DEFRA in the light of the increasing interest in Short Rotation Forestry (SRF). The overall aim was to provide a preliminary overview of the potential impacts of SRF on biodiversity, soils, hydrology and landscape in order to inform policy and strategy and provide reference for planning research.

In its summary the report states; *“Overall, SRF appears to have considerable potential within UK as a source of renewable fuel. If used creatively as part of the revision of CAP it could lead to improved biodiversity, better visual values and enhanced rural economic activity. There are potential negative impacts from SRF but these may be controlled and minimised by application of a creative, integrated code-of-practice to ensure that SRF operates in an optimal way to secure the positive impacts. A supportive policy and fiscal framework could reinforce good practices.”*

At the stakeholder consultative meeting last summer, several options were discussed to increase woodland planting rates, but no mention was made of SRF. The Forest Service report to the February 2010 NIRDP Monitoring Committee indicates that the recent increase in WGS/FWPS rates seem to have been successful in encouraging increased planting effort. However, if SRF were to be included within the current WGS/FWPS schemes, this would encourage still further planting.

The Forestry Grant Scheme Information Booklet was last amended in Nov 2008 and is presumably due revision in light of the recent uplift in the grant rates. As there is currently no mention of SRF in the booklet, the amendment would seem a good opportunity to include it. Proposals for amendment are offered at Annex A.

Yours sincerely



PETER ARCHDALE
DEPUTY CHAIRMAN

¹ <http://www.usewoodfuel.co.uk/Docs/Impact%20of%20SRF%202006.pdf> (Accessed 1 Feb 2010)

Proposed amendments to FGS Booklet

Proposed amendment in RED

Comment in GREEN

Page 2 WGS

AIMS OF THE SCHEME

3. The overall aims of the WGS is to complement the objectives of the Forestry Strategy by:

(i) Encouraging the creation and sustainable management of woodlands and forests to:

- increase the area of tree cover in Northern Ireland;
- increase the production of wood;
- improve the landscape;
- improve woodland biodiversity; and
- offer opportunities for recreation and sport.

(ii) Providing jobs and improve the economy of rural areas and other areas with few sources of economic activity.

(iii) Providing a use for land as an alternative to agriculture.

SRF fits all the above. In respect of 3.(ii). SRF would be significantly better than other woodland in achieving this aim, as there is currently a lively market in firewood, but insufficient material available.

Period of Commitment

6. All grants are paid as part of an agreement under which the owner undertakes to maintain the woodlands in accordance with good forestry practice for a minimum of 30 years in the case of predominantly broadleaved woodlands, and 20 years in the case of predominantly conifer or fast growing broadleaved woodlands (e.g. Poplar).

SRF would need to remain the sole land use on grant aided sites for at least 20 years.

Page 6 FWPS

Period of Payment

3. FWPS annual payments are made for either 10 years or 15 years, depending on the trees planted and how they will be managed.

Payments for 15 years

To receive annual payments over 15 years, more than 50% of the area of the wood must be planted with broadleaved trees. The wood must not be felled within the 30 years following the first annual payment. Silvicultural thinning during that time is allowed, provided the wood remains mainly broadleaved. Nurse trees which are to be removed from the woodland are not included when determining the percentage of the area planted with broadleaves.

SRF should be classified as a conifer/fast-growing broadleaved and not a broadleaved crop wrt WGS/FWPS.

Payments for 10 years

Woodlands with 50% or more of the area of the wood planted with conifers, or fast growing broadleaves to be felled in less than 30 years (eg. Poplar and SRF species), will receive annual payments for 10 years. They, less SRF, must not be felled within 20 years of the first annual payment. Woodlands which are to be felled before 20 years are not eligible for FWPS. SRF rotations are shorter than 20 years and consequently any harvested SRF woodland is to be replanted and kept in tree cover for 20 years following the first annual payment. SRF is not eligible for Restocking grants (and in most cases restocking should not be necessary).

This is the key paragraph in the guidance booklet. If it is accepted that woodland is still woodland, even if it is cleared after 8 years and then replanted, then there should be no real constraint to its inclusion in WGS/FWPS.

SRC willow is given support for establishment but is not eligible for any further restocking payments. SRF could be considered in much the same way. Consideration should be given to making a restocking grant available once every 3 rotations (~24 years).

Maintenance of the Woodland

16. If you do not achieve adequate establishment within the time agreed with the Forest Service we may seek to recover all FWPS payments and your WGS payments will also be at risk.

17. Once accepted into the FWPS, you must maintain the woodland in accordance with good forestry practice and ensure that the land planted with trees is not returned to agriculture for at least:

- thirty years after planting for woodlands receiving payments for 15 years (generally more than 50% by area of broadleaves, see paragraph 3);
- or twenty years for woodlands receiving payments for 10 years (generally 50% or less by area of broadleaves, see paragraph 3). If all or part of the woodland area is removed by any means during the above periods, you will be liable to repay with interest FWPS payments received. You will, nevertheless, normally be allowed to thin the woodland in accordance with normal silvicultural practice or remove nurse trees. **An exception to this rule is made for SRF where any woodland harvested before 20 years is replanted or allowed to regenerate without any restocking grant support.**

If a conifer plantation is felled after 20 years it is eligible for a restocking grant. The logic behind the 20 year rule is to stop repeated applications for restocking grants.

Page 7

Woodland Types

14. All new woodlands must meet the criteria and standards of WGS. Most woodlands qualifying for WGS will therefore also qualify for FWPS. There are, however, some exceptions:-

The following are excluded from the scheme:

- a. planting in existing woodlands, including grazed woodlands, although a field which contains a few scattered trees may be eligible;
- b. planting for the purpose of agroforestry (that is tree planting combined with any form of agricultural activity on the same land);
- c. planting of woodlands to be managed in part or whole for the purpose of producing Christmas trees;
- d. planting of woodlands to be managed as coppice, including both traditional coppice rotations and short rotation coppice.

It is noted that SRF is not already excluded.

Page 8

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If all or part of the woodland area is removed by any means during the above periods, you will be liable to repay with interest FWPS payments received. You will, nevertheless, normally be allowed to thin the woodland in accordance with normal silvicultural practice or remove nurse trees. **An exception is made for SRF where the timber can be harvested before 20 years as long as the woodland is replanted or allowed to regenerate and woodland cover is kept for at least 20 years. The restocking of SRF woodland is not eligible for grant support.**

It should also be noted that under existing guidelines any SRF woodland created under WGS/FWPS would need to have at least 5% native broadleaved fringe planting and be subject to good silvicultural practice. Consideration should be given to increasing this percentage to 15%. This marginal planting continues to mature when the main crop is harvested after 8 years.