

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

## Petitioner written submission, 13 August 2024

[Scottish Environmental Link has just released a comprehensive strategy to tackle Invasive Non Native Species \(INNS\) in Scotland.](#) The first case study (p19) states:

“Sitka, and other non-native conifer species grown commercially, are increasingly seeding invasively onto neighbouring habitats, including important peatlands, ancient woodlands and community-managed woodlands, posing significant risks to ecosystems and carbon sequestration, and can lead to biodiversity loss in all habitats ...

The burden of managing the invasive spread of Sitka and other non-native commercial species is therefore falling onto the public purse and environmental organisations, threatening significant strain on limited current and future conservation budgets. Forthcoming legislative agendas are an opportunity to ensure that commercial forestry plays a responsible role in managing the impact of Sitka spreading from its operations onto neighbouring land through the application of the “Polluter Pays” principle (as in the Articles of the EU Invasive Species Regulation, as transposed into Scots law). The industry that profits from planting and harvesting these conifers should either remove invasive seeding conifers or bear the costs of remedial action on invasive seeding, and be required to ensure better buffering of plantations near sensitive sites.”

According to [a recent report from the Scottish Environment Protection Agency \(SEPA\) focussing on the logging industry’s practices in Argyll & Bute](#), in 2022-23, 47% of commercial plantations inspected were not compliant with the UK Forestry Standard and Scotland’s Forestry Strategy. The report states:

‘...it is of concern that findings from Argyll show poor compliance despite the abundance of improved information, improved communication, and shared learning.’

According to the Environmental Rights Centre for Scotland (ERCS), of the 305 applications since 2019 (when Scottish Forestry was established) for new commercial plantations impacting designated (SSSI, SAC etc) nature sites (including native woodland), only one has required an Environmental Impact Assessment (EIA). ERCS has escalated concerns to [Environment Standards Scotland \(ESS\), which has opened a consultation on INNS in Scotland.](#)

[Our own community council’s latest stage 2 complaint to Scottish Forestry](#) regarding unlicensed clear felling in long established (native) woodland in 2021, [previously noted in our submission of 31 August 2021, has been partially upheld after Scottish Forestry did not honour their commitment to consult with the community on the landowner’s plans for further felling](#) in a revised version of their woodland management plan.

Confor's submission to the Petitions Committee is typical of the logging industry's approach to Scotland and Scotland's communities. Just a few minutes invested in research on the Scottish Parliament's website and Confor would have discovered the Petitions Committee has already engaged with the Woodland Trust Scotland on multiple occasions over the last four years. The irony of Confor targeting a report prepared by the Royal Society of Edinburgh – a charity comprised of 1,800 or so of Scotland's highest achieving business leaders, policy advisers and academics charged with a vision of 'Growing, exploring and sharing knowledge for a thriving Scotland.' – is not lost on us. We hope the Committee will extend an opportunity to the RSE to contribute a submission, based on their research, focussed on constructive solutions to stem and reverse the logging industry's pernicious effects on Scotland, especially our ancient and native woodland.