Cyswllt Amgylchedd Cymru | Wales Environment Link

Consultation response: Timber Industrial Strategy

Wednesday 16th April 2025

1. Increasing timber supply

i. How can the sustainable forest resource grown in Wales, be increased to make more timber and wood fibre available for the future?

We broadly welcome incentivising and enabling of increased woodland creation for multiple beneficial purposes and outcomes in Wales. We would advocate for a regional land use framework to ensure multi-functional but sustainable use of Welsh land, which works within ecologically coherent bioregions and would help mediate competing pressures, including ensuring where commercial afforestation or native woodland creation is most appropriate and beneficial.

We believe that a significant proportion of new woodland creation should be of native broadleaved trees, especially where these areas can connect, buffer and extend areas of native and ancient woodland and deliver increased biodiversity in support of the Biodiversity Commitments. This should include a variety of options for woodland creation, including natural colonisation and regeneration (of native broadleaves). This does not preclude the sensitive and sustainable practice of productive forestry in many of these new wooded areas but we would hope to see this done based on the Right Place First principal (summarised on p13 here).

We are supportive of the objective to bring more woodland into certification, particularly those meeting the UK Woodland Assurance Scheme (UKWAS) standards.

ii. How can volumes of Welsh timber and wood fibre coming to market be increased?

In any attempts to bring greater volumes of timber to market from the Welsh Government Woodland Estate and to speed up restocking, there should be no

perverse incentives to meet short term timber targets by clear-felling woodland, particularly not in planted ancient woodlands. These should be properly managed and gradually restored; either by thinning / continuous cover methods and natural regeneration or restocking of PAWS (Plantations on Ancient Woodland Sites) with native broadleaved species. It would also be welcome to see consideration of a Continuous Cover Forestry approach, where forests are "maintained in a permanently irregular structure […] created and sustained through the selectin and harvesting of individual or small groups of trees". There's evidence that this creates a more resilient, multi-generational forest with a greater variety of species, and works well with natural regeneration / colonisation methods, with a range of biodiversity and carbon capture benefits.

We should also highlight the need for landscape-level ecosystem management, such as sustainable deer and squirrel management programmes, involving collaboration at a landscape scale if they are to be effective.

Ambitious targets for increased tree cover at a Wales level, including on farmland via the Sustainable Farming Scheme is welcomed, and will benefit the environment, biodiversity and farm businesses. However, there is a negative perception of trees on farms in the industry which needs to be addressed before this can happen i.e. trees at the expense of productive land. To address this misconception, it must be supported by adequate resourcing and sound advice and training.

2. Increasing resilience in our forests

i. What actions can be taken in Wales to reduce the risks to our forests posed by climate change and pests and diseases?

We would encourage promoting greater species and structural diversity in woodlands of all types as key to resilience; moving away from monocultures, such as Sitka Spruce, particularly on the Welsh Government Estate; toward greater use of more species mixtures; and, where appropriate, Continuous Cover Forestry (CCF) approaches. It's also important to prioritise rhododendron removal and banning sale of new rhododendron, particularly on the Welsh Government estate.

Processes, systems and grant schemes should provide better support and training to promote the establishment and maintenance of woodland cover through natural regeneration or colonisation (as outlined in WEL's natural colonisation position) as this is the best way to secure locally adapted and genetically diverse trees, alongside supporting a significant upscaling in nursery production of Welsh provenance trees, locally sourced-and-grown planting stock.

The management of woodlands will need to be adapted in terms of better resilience to extreme weather events, climate change, pests and diseases. Continuous cover techniques, low impact silviculture in the uplands and riparian planting should be incentivised to reduce the risks of impacts such as downstream flooding and soil erosion during extreme rainfall events. Clear-felling exacerbates these negative impacts.

Biosecurity measures need to be rigorously implemented to avoid the import of new pests and diseases. Industry pressure to diversify the non-native stock for commercial planting must not be allowed to drive importation of stock in a way that could heighten the risk of importing novel pests and diseases; this will require UK-level coordination not just Wales in isolation.

Proposed schemes should clearly outline measures to prevent the spread of invasive tree seeds, particularly from Sitka Spruce and other non-native commercial species, onto adjoining land such as peatlands and ancient woodlands. These species are known to self-seed prolifically, colonising sensitive habitats and threatening both biodiversity and the carbon storage capacity of peatlands, as their encroachment can lead to the release of stored carbon and the displacement of native flora (i.e. such as here on the Berwyn mountains). The ongoing removal of invasive conifers is a significant and recurring financial burden for conservation-focused NGOs, as it requires sustained effort to restore affected ecosystems. To address this, applying the "polluter pays" principle – to be embedded in the upcoming Nature Positive Bill – would ensure that commercial forestry operators are held financially responsible for managing and mitigating the spread of invasive species from their plantations, rather than shifting the costs onto conservation organisations or the public. This approach incentivises forestry businesses to implement effective containment and

management strategies, aligning economic interests with environmental stewardship.

ii. How can growers and nurseries accelerate the implementation of adaptation measures?

In terms of our native woods, selection of local provenance, increases in native nursery stock or preferably use of natural regeneration or colonisation is the most desirable approach for both climate adaptation and biodiversity outcomes.

Our native woodland habitats must be made more resilient through application of the DECCA framework. A commitment to the restoration, at pace, of all Wales' planted ancient woodlands to a predominantly native composition and structure could make a major contribution to woodland condition, and increase the number and size of high-quality habitat. At the same time, a lack of appropriate management is a cause of poor ecological condition in many of our native woodlands. A lack of natural regeneration, colonisation, deadwood creation and structural diversity renders those woodlands less resilient to threats and less able to support a range of woodland specialist species. Bringing native woods back into appropriate management could also increase the available timber resource. Prioritising native woodland creation within priority ecological networks for native woodland, for example buffering of and expanding irreplaceable ancient woodlands, while increasing tree cover generally, will be essential to ensure our native woodland habitats remain resilient.

We support the intention to 'promote best practice and provide support for woodland management actions to improve unmanaged and undermanaged woodland', as part of a resurgence of sustainable economic activity in existing Welsh woodlands and support 'the sustainable management of natural resources', so long as the definition of improvement takes into account the needs of nature and the special qualities of ancient woodlands, and particularly our most unique and globally significant woodland habitats, including temperate rainforest.

3. Resource efficiency and circular economy

i. **What actions could be taken in Wales to encourage reuse and recycling of wood to minimise waste?**

For timber products that are going to be used in long term products, such as buildings (as identified in the consultation document), there could be an opportunity to value the locked-up carbon. Where that carbon will be locked away for over 30 years, there is the potential to utilise additional monies from the UK emissions trading scheme and other carbon credit payments. However, this would require the accounting and tracking of every piece/bundle of timber, from harvesting to use in a building, to ensure that there was sufficient trust and certainty to access those credits. Plus, only the carbon from the tree that would actually be stored in a building would be able to be counted, and this would have to be minus any carbon emissions associated with harvesting and processing. However, this could make Wales a global leader in sustainable production of embodied carbon timber products with a regulated market for the embodied carbon.

ii. **How could Wales promote innovation, to design and manufacture wood-based products with increased value, extended durability and climate resilience?**

This is not our area of expertise, but we would advocate for promoting recycling timber products and ensuring the sources are well managed in a sustainable way.

4. Instilling confidence in demand

i. **What actions could be taken in Wales to increase the use of timber and wood fibre in long-term uses, such as construction?**

The Welsh Government could use its procurement (i.e. affordable housing) and planning powers to encourage the use of sustainable, local timber where possible and Welsh timber products in construction as a preferred choice. Although we question whether Wales being self-sufficient in timber is feasible or indeed desirable given the amount of land take it might require, and the possible negative effects on habitats and potential habitats. Having a UK-wide self-sufficiency goal may be more

appropriate (with perhaps a fair proportion expected to be delivered by each of the home nations relative to size).

ii. How can we use home-grown timber and wood fibre to maximise local supply chain opportunities?

The South Wales Valleys or parts of North Wales could be used for mass timber manufacture – utilising old industrial sites and sustainably grown timber from across the UK to make a high value product, with good transport links to the rest of the UK, the EU and internationally. Much more value and jobs could be delivered within Wales by producing higher value timber products. Production of glulam (glued laminated timber), for example, in Welsh facilities would provide a supply chain to align with a preferred procurement and planning hierarchy which encourages use of Welsh sustainable timber in larger buildings.

The value of Welsh timber could be further developed by incorporating engineered mass timber products into pre-fab building manufacture. Increasingly, whole sections of buildings are made in indoor factory settings, at high quality, and then transported and assembled in a modular way on site, significantly reducing on-site build time and increasing quality. Investing in Welsh pre-fab manufacturing facilities utilising Welsh/UK timber would capture more of the value generated by timber in Wales.

iii. How can Wales better align timber supply with market demand?

As mentioned earlier, Welsh Government could use its procurement and planning powers to encourage the use of sustainable, Welsh where possible, timber products in construction as a preferred choice.

5. Developing sector capacity

i. What challenges need to be addressed to improve recruitment and retention in forestry and timber industries in Wales?

In support of the promotion of close to nature (CNF) and continuous cover systems (CCF) and bringing broadleaved and smaller/ farm woodland into management, there

needs to be investment in developing the knowledge and skills among professional foresters around planning for CNF and CCF approaches, as well as developing a contractor base who have the competence, skills, knowledge, experience and the right equipment, to deliver the right, low impact operations to enable these approaches, especially on ancient woodland sites. This should be joined up to the optional and collaborative layers of the Sustainable Farming Scheme, ensuring advice to farmers and landowners facilitates new techniques and sustainable management.

ii. What gaps are there in forestry and timber training and skills provision in Wales?

Raising awareness and education of woodland management opportunities and techniques also needs to become integrated within the farming sector rather than seen as something separate. There are examples of successful SMEs which are making the management of small and high nature value woodlands financially viable, but there is work to be done in amplifying these case studies and enabling other Wales based businesses and start-ups to identify and realise the business opportunities in this space; diversifying the contractor base and reducing the sector's reliance on a small number of large international/ corporate forestry companies. Multipurpose forestry which delivers multiple benefits and outcomes and using a range of environmental knowledge and stakeholder engagement skills could become an attractive career to a new generation of agents and advisors. A centrally supported and long-term training programme in forestry could be a pathway within a National Nature Service, providing career routes for work in forestry.

iii. What actions are needed to support the development and adoption of new products, processes and/or technologies?

Consideration also needs to be given to equipping the processing sector and beyond to be able to accommodate and capitalise on the wider range of species and timber sizes that would be likely to result from a more structurally diverse forest resource.

In delivery of the following aspirations, care is needed to complement and not to duplicate existing competency frameworks e.g. FISA, to ensure consistency across the UK. We advocate for the following:

- develop a set of competency frameworks to demonstrate career progression within the sector.
- work with the sector to develop a standardised industry recognised tool allowing the workforce to record training and evidence CPD.
- develop higher level professional training programmes working with the other devolved Nations to ensure a consistent approach

One key area where there is need for better awareness beyond the professional forestry sector is around Forest Works Manager competency and CPD pathways, to ensure that woodland operations across the board are being managed to a consistently high standard of both safety and environmental compliance.

6. Underpinned by behaviour change

i. What actions are needed to improve public understanding of productive forestry?

Raising awareness of the benefits of trees and woodlands through the curriculum, through the farming sector and other land-based activities is essential, as is the acknowledgement of the need to diversify the participation in the sector.

One way to engage people with the benefits of woods and trees is to bring those benefits into the urban communities where a majority of Welsh people live and to give people the tools to identify where trees could be integrated into their local environment.

Some urban and local authorities have embraced the benefits of trees and woodland, with good examples being the Tree & Woodland Strategy produced by Wrexham CBC and the work they have undertaken supported by the Woodland Trust's Emergency Tree Fund, or the work of Coed Caerdydd. Challenging all Welsh authorities to develop a Tree & Woodland Strategy and to integrate trees and woods as solutions across the policy agenda, for climate adaptation, health and wellbeing, could support the objectives of the TIS, while enabling a network of 'tree towns' committed to increasing canopy cover to 30% and targeting new tree cover in communities where

access to green space is the least equitable could deliver for public engagement, social justice and improve our urban environments.

While trees remain one of the best-evidenced forms of carbon sequestration, that is not the only reason, nor necessarily the most compelling reason, to increase tree cover: the potential benefit of homegrown timber originating from a sustainable and diverse woodland resource in Wales from a local economy perspective, as well as the health & wellbeing benefits of access to woodland for people, might be the most powerful public messages. The nature and climate adaptation benefits should also be made explicit, while for landowners, understanding how trees and woodlands can be planned and used by farmers themselves, in ways that directly support the economic sustainability of the farm business, is likely to be among the best ways to incentivise engagement.

ii. Do you support the proposal to establish an Industry Leadership Group in Wales? If yes, what contribution could it make during the implementation of the Timber Industrial Strategy?

This group would need to include representatives from a range of sectors to maximise its value and credibility. For example, in addition to the timber industry it could include reps from nature organisations, construction, tourism, water and farming. This will allow the identification of areas of shared benefit and synergy, where value can be added and reduce cross system impacts that can be avoided.

iii. Do you support the proposal to recruit a Chief Forester for Wales? If yes, what added value would the role bring to the forestry sector in Wales?

If they were to be a driving force behind new proposals, bring organisations together where they haven't been enabled before, this could be a worthwhile proposal as it often takes people to drive new work. However, without knowing more what their role would be, it's hard to have a view.

7. What, in your opinion, would be the likely effects of the proposals on the Welsh language? We are particularly interested in any likely effects on

opportunities to use the Welsh language and on not treating the Welsh language less favourably than English.

i. **Do you think thatr there are opportunities to promote any positive effects?**
ii. **Do you think that there are opportunities to mitigate any adverse effects?**

n/a

8. **In your opinion, could the proposals be formulated or changed so as to:**
   - **have positive effects or more positive effects on using the Welsh language and on not treating the Welsh language less favourably than English; or**
   - **mitigate any negative effects on using the Welsh language and on not treating the Welsh language less favourably than English?**

n/a

9. **We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them. Please enter here:**

n/a

Wales Environment Link (WEL) is a network of environmental, countryside and heritage Non-Governmental Organisations in Wales. WEL is a respected intermediary body connecting the government and the environmental NGO sector. Our vision is a thriving Welsh environment for future generations.

This paper represents the consensus view of a group of WEL members working in this specialist area. Members may also produce information individually in order to raise more detailed issues that are important to their particular organisation.

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