

Scotland's Forestry Strategy 2019-2029 SEA Post Adoption Statement

March 2019

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1 Background

- 1.1.1 Scotland's Forestry Strategy 2019-2029 sets out the Scottish Government's long-term vision for forestry in Scotland and was prepared in line with the Forestry and Land Management (Scotland) Act 2018, which requires Ministers to have regard to the strategy when exercising their forestry functions. The strategy is available online at <https://www.gov.scot/policies/forestry/forestry-strategy-project/>
- 1.1.2 A draft strategy was prepared in 2018 and was subject to Strategic Environmental Assessment (SEA). The associated Environmental Report was consulted on alongside the draft strategy. The consultation ended on 29 November 2018 (https://consult.gov.scot/forestry/scotlands-forestry-strategy-2019-29/consult_view/)
- 1.1.3 The draft strategy identified a 50-year vision, three 10-year objectives and 10 priority areas for action. Following consultation, the 10 priorities were revised and rationalised down to 6. Neither the draft strategy, nor the final Strategy specify detailed actions for implementation, as further information will be provided in the associated implementation, monitoring and reporting framework that will be published within 12 months of laying the Strategy before the Scottish Parliament.

2 The Strategic Environmental Assessment Process

- 2.1.1 The Environmental Assessment (Scotland) Act 2005 (the '2005 Act') requires public bodies in Scotland to carry out SEA on their plans, programmes and strategies. SEA is a way of examining plans, programmes and strategies as they develop, to identify any significant effects they may have on the environment. It ensures that environmental considerations are taken into account. SEA also aims to build in mitigation measures, to avoid or minimise any potentially significant adverse effects on the environment, and look for opportunities to enhance a strategy's environmental performance.
- 2.1.2 This SEA process began with the production of a Scoping Report which was submitted to the SEA Gateway in June 2018. Representations received from the SEA Consultation Authorities (Scottish Environment Protection Agency (SEPA), Scottish Natural Heritage (SNH) and Historic Environment Scotland (HES)) to the scoping stage, helped to inform the content of the draft strategy and the following stages of the SEA process. All SEA topic areas were scoped into the assessment. The assessment focused on the 10 priorities in the consultation draft Forestry Strategy.
- 2.1.3 The assessment and the production of the SEA Environmental Report progressed during August and September 2018, in parallel with the preparation of the draft strategy.
- 2.1.4 Following consultation on the draft strategy and associated Environmental Report, an independent analysis of consultation responses received was carried out and is available online at:
<https://consult.gov.scot/forestry/scotlands-forestry-strategy-2019-29/results/scotlandsforestrystrategy2019-2029-consultationanalysisreport.pdf>
- 2.1.5 Using this analysis, the Scottish Government produced a report that outlines how the views expressed in the consultation helped to inform the content and structure of Scotland's Forestry Strategy 2019-2029. It is available at:
<https://www.gov.scot/publications/scotlands-forestry-strategy-20192029-report-consultation-process-undertaken/>
- 2.1.6 This Post Adoption Statement concludes the SEA process and sets out those ways in which the findings of the SEA Environmental Report, and the views expressed by consultees have been taken into account.
- 2.1.7 Section 18(3) of the Environmental Assessment (Scotland) Act 2005 sets out the information that should be included in the Post Adoption Statement. This can be summarised as:

- how the environmental considerations have been integrated into the plan, programme, or strategy;
- how the Environmental Report has been taken into account;
- how the opinions of consultees have been taken into account;
- the reasons for choosing the strategy as adopted, in light of the other reasonable alternatives considered; and
- the measures to be taken to monitor the significant environmental effects of the implementation of the plan, programme or strategy.

3 Integration of Environmental Considerations into the Forestry Strategy

- 3.1.1 This section explains how key environmental considerations were identified and how these were taken into account in the development of the final version of Scotland's Forestry Strategy 2019-2029.
- 3.1.2 From the outset, the preparation of the environmental baseline for the SEA helped to frontload environmental considerations into the draft strategy. Subsequent consultation with the SEA Consultation Authorities assisted in highlighting key environmental issues for further consideration.
- 3.1.3 During the development of the draft strategy, the Scottish Government drew on evidence on the potential key issues facing forestry over the next 10 years (the period of the Strategy), and the requirements of the Act, as a basis for developing the 50-year vision and the 10-year economic, social and environmental objectives and priorities.
- 3.1.4 These key issues, and the scope of the strategy's vision, objectives and priorities for action were then discussed with a broad range of Scottish Government policy teams, representatives from the SEA consultation authorities, and external stakeholders.
- 3.1.5 A number of structured discussions took place with a range of stakeholders, including, amongst others: the Confederation of Forest Industries (Confor), the Community Woodland Association, Forest Policy Group, the RSPB, the UK Forest Products Association, Woodland Trust Scotland and the Central Scotland Green Network Trust.
- 3.1.6 A Reference Group was also formed to feed into the development of the draft strategy; increase the effectiveness of the formal consultation process by supplementing and facilitating wider consultation and liaison activity associated with the strategy; and provide views on, and insight into the reaction of others during the consultation process. The group's members represented a wide range of interests and expertise in forestry and land use in Scotland (more details are available in the Scottish Government's report on the consultation which is available at: <https://www.gov.scot/publications/scotlands-forestry-strategy-20192029-report-consultation-process-undertaken/>).
- 3.1.7 The 10 priorities in the consultation draft strategy were subject to environmental assessment with the results of the assessment informing their further development.

4 The findings of the SEA

4.1.1 The Environmental Report details the conclusions and recommendations of the assessment on the consultation draft strategy. The key themes drawn from the assessment are discussed below:

- The SEA findings concluded that the draft strategy, with its core purpose of promoting and supporting the implementation of sustainable forest management (SFM) principles, would have overall positive effects. Cumulative effects were expected to be positive over all of the environmental topics.
- Where appropriate, adherence to the requirements of the UK Forestry Standard (UKFS) and existing environmental regulation and mitigation was taken into account as ‘assumed mitigation’, and factored into the assessment of the significance of effects. In addition to the UKFS, this included relevant requirements of the planning system (where applicable to associated built development); the Forestry (Environmental Impact Assessment) (Scotland) Regulations 2017¹ and Plant Health (Forestry) legislation².
- The SEA concluded that there could be potential for some mixed effects in relation to the historic environment; landscape; and, to a lesser extent, biodiversity, air quality and soil. Mitigation measures for any potential negative impacts were proposed in the Environmental Report.
- It is anticipated that the outcomes of the SEA and in particular key potential effects, can be monitored as an integral part of the monitoring of the Forestry Strategy itself.

4.1.2 A key recommendation that came out of the assessment process was the re-affirmation of the importance of the promotion and adherence to the principles of SFM. The draft strategy had these principles embedded in its vision and ambitions and stated that the UKFS is a key requirement for the associated delivery of forest and woodland creation, management and protection. In light of the SEA findings and the consultation responses, the finalised Strategy has provided a clear commitment to this approach by including the following priority for action: “Ensuring forests and woodlands are sustainably managed”.

¹ The Forestry (Environmental Impact Assessment) (Scotland) Regulations 2017 (2017) [online] Available at: <http://www.legislation.gov.uk/ssi/2017/113/made> (accessed 24/09/2018)

² Plant Health (Forestry) legislation (2000) [online] Available at: https://ec.europa.eu/food/plant/plant_health_biosecurity/legislation_en (accessed 06/02/2019)

5 How the opinions expressed have been taken into account

- 5.1.1 The Environmental Report was issued for consultation alongside the draft strategy and views were invited on 17 questions. 10 questions related to the draft strategy, five to the Environmental Report and two questions related to other statutory impact assessments.
- 5.1.2 The consultation received 442 responses from 102 organisations and 340 individuals. Of the individual responses, 216 were identical and generated as part of a campaign led by Woodland Trust Scotland. Respondents from organisations included membership representative bodies, businesses, campaign groups, charities, research institutions and public sector bodies, including the three SEA Consultation Authorities (HES, SEPA and SNH).
- 5.1.3 Roughly a quarter of consultation participants (114 out of 442 participants) responded to one or more of the five questions which invited views specifically on the SEA Environmental Report. Of those 114 responses, 70 were received from individuals and 44 from organisations (including the SEA Consultation Authorities), with around half of this group (55 respondents) offering substantive comments and the remainder providing only responses to one or both of the yes / no questions on the SEA.
- 5.1.4 Following the public consultation, the draft strategy was updated, taking into account the findings of the Environmental Report and the views expressed during the consultation, as well as to reflect developments since the draft was published in September 2018.

6 Comments on the draft strategy

6.1 General feedback

- 6.1.1 There was general support for the draft strategy and its contents, with only one section (Priorities for action) receiving more negative than supportive comments. However, there were also numerous and often conflicting requests for changes to be made to the detail, structure and presentation of the document. Views expressed are summarised below.
- 6.1.2 Many respondents asked for more detail to be provided throughout the document. Changes have been made to specific areas of the strategy to provide better clarity. In particular, greater detail on the rationale for the inclusion of specific priority areas and the types of activity that will be undertaken has been provided. Additions have also been made in relation to implementation and delivery.
- 6.1.3 There were numerous, varied calls for changes to the presentation of the document to improve clarity, including an improved explanation of the linkages between the vision, objectives, issues and priorities. This has been addressed through redrafting, in particular of sections 4 and 5, focusing on strategic drivers in section 4 rather than the more ambiguous “major issues”, and replacing the tables in section 5 with clearer text on priorities for action to improve clarity and logic flow.
- 6.1.4 Similarly, there were frequent calls for greater demonstration of ranking within the strategy – ranking of objectives, issues and priorities. However, in recognition of the interdependencies of the three components of SFM – economy, environment and society – ranking has not been introduced. This is to ensure the strategy is both balanced and remains relevant throughout its 10-year lifespan, with enough flexibility to adapt to changing circumstances.

6.2 Woodland Trust Campaign response

- 6.2.1 As noted above, almost half of all responses were identical and were generated via a campaign by Woodland Trust Scotland. These responses called for the strategy to provide clear plans of action, with ambitious targets that are monitored and regularly reported on for the following: native woodland creation; improving the condition of existing native woods; and the protection of ancient woodlands.

6.2.2 Within Scotland's Biodiversity Strategy³, the Scottish Government has already committed to, and set targets for native woodland creation and improvements in native woodland condition. These targets were previously set out in the draft strategy in section 3 on the vision and objectives. To give them more profile they are now detailed in the introduction (section 1). In addition, the sections of the strategy dealing with strategic drivers and priority areas for action now include explicit references to: preventing ancient woodland losses; supporting the creation of native woodlands, protecting woods and forests from the risks posed by invasive non-native species, deer and other herbivores; and improving the ecological condition of native forests and woodlands, including plantations on ancient woodland sites.

6.3 Thematic analysis

- 6.3.1 Due to the diversity in responses received to the consultation, a thematic analysis of responses was carried out, grouping the content of responses around the three components of SFM (economy, environment and society). The following theme-specific messages were identified.
- 6.3.2 A common theme amongst those discussing **economic concerns** was a request for greater recognition of the need for improvements to rural infrastructure to support the sustainable transportation of timber. This has now been covered in both the strategic drivers section, as well as within the priority areas for action (priority 3).
- 6.3.3 For respondents that commented on the **environment**, there were frequent calls for the strategy to include a greater focus on biodiversity. To address this, greater prominence has been given to biodiversity throughout the document, particularly within the section on the contribution of Scotland's forests and woodlands, and within the priorities for action section, where a number of biodiversity-related activities are listed under priorities 4 and 5.
- 6.3.4 Responses from both those with an environmental focus and those with a more social focus, also called strongly for more emphasis on the application of integrated approaches to land management. In finalising the strategy the Scottish Government have strengthened the profile of integration throughout the document and in particular the 50-year vision now includes explicit reference to the integration of forestry with other land uses.
- 6.3.5 Responses that discussed **social issues** commonly asked for more comprehensive consideration of small-scale forestry. As such, the new priorities for action make it clear that the creation of a range of types and scales of new forests and woodlands will be supported and that, likewise, businesses of different types and scales will be supported to develop and grow markets.

³ Scotland's biodiversity: It's in your hands (2004) and 2020 challenge for Scotland's biodiversity (2013) <https://www.gov.scot/policies/biodiversity/scottish-biodiversity-strategy/> (accessed 31/01/2019)

6.3.6 Another call made in responses that discussed social issues was to raise the profile of the value of forests and woodlands in mitigating the impacts of climate change for the benefit of current and future generations. This has been addressed in the drivers and priorities sections, with greater emphasis being given to the adaptability and resilience of Scotland’s woodlands and forests.

6.4 Vision and objectives section

6.4.1 The majority of respondents agreed with the draft strategy’s vision (64% of those that responded to the question) and felt that the objectives set out in the draft strategy were the right ones (60% of those that responded to the question). There were no consistent messages regarding requests for revisions to either the vision or objectives, and instead comments tended to focus on giving greater emphasis to a particular issue or area of SFM, or requested a level of detail not appropriate for a strategic vision and objectives. The vision has therefore been refined, and the objectives have been re-drafted to improve their clarity and ensure they are measurable (which was an issue raised by some respondents).

6.5 “Major Issues” section

6.5.1 Just over half of respondents agreed with the assessment of the major issues within the draft strategy (54% of those that responded to the question). Some respondents described the presentation of the issues as confusing. To address this the Scottish Government have reframed this section of the document, clarifying its purpose and focusing on strategic drivers rather than ‘issues’. This better reflects its content and improves the logical flow of the document.

6.5.2 There were numerous and wide-ranging requests for additional issues to be included in this section. All comments have been considered in light of the revised focus on strategic drivers. Where appropriate, specific comments have been incorporated into the text.

6.6 Priorities for action and policies for delivery section

6.6.1 Just under half of respondents felt that the ten priorities identified in the draft strategy captured the areas where action is most needed to deliver the objectives and vision of the strategy (48% of those that responded to the question). Negative responses to this question tended to focus on aspects of the presentation, structure or discussion rather than the priorities themselves. There was also a sense that the priorities could be more clearly linked to the vision, objectives and issues, and should be sufficiently quantifiable to be able to measure progress.

- 6.6.2 To improve clarity, the priorities section has therefore been redrafted. The information included previously is now presented in a different way and the tables have been removed. The number of priorities has been reduced from ten to six and these are higher-level, broader and more strategic. This approach allows the priorities to be more cross-cutting across the three key objectives, which better reflects the principles and the multi-purpose nature of sustainable forestry.
- 6.6.3 While the number of priorities has been rationalised from ten to six, more explanatory detail has been provided below each priority. For example, an improved rationale has been included for each priority area for action to strengthen the linkages with other sections of the strategy, enhancing the overall logical flow. In addition, information on the types of activity that will be undertaken within the priority action areas has also been provided. The finalised priorities have also been drafted in such a way as to improve their measurability.
- 6.6.4 There were calls for greater detail on how the strategy will be implemented and delivered, and calls for a commitment to engaging with stakeholders in the development of plans for implementation and a monitoring and reporting framework.
- 6.6.5 To address these requests, delivery, monitoring and reporting is now covered in a distinct section of its own in the finalised strategy. This section provides greater clarity on the delivery, monitoring and reporting process and the role of government and other stakeholders within it.
- 6.6.6 Respondents shared numerous examples of effective delivery mechanisms and suggested several indicators which could be included in a monitoring framework. These suggestions will be considered during the delivery phases, after the strategy has been published and then laid before Parliament.
- 6.6.7 A key finding from a survey which targeted young people was that respondents felt that a crucial current benefit of forests was their contribution to reducing climate change and that this will grow in importance over the next 50 years. This has been addressed in the final strategy by improving the profile of climate change mitigation and adaptation throughout the document, including within the priorities for action. The benefit identified as the most important currently and ranked second in importance in the future was the provision of habitats for wildlife. The priorities section of the strategy now makes a specific commitment to safeguarding priority habitats and species.
- 6.6.8 The structure and content of this section of the strategy have been refined and improved and the Scottish Government is content that there have effectively been no new additions that would necessitate a further strategic environmental assessment to be carried out.

6.7 Impact Assessments – Equality Impact Assessment

- 6.7.1 Feedback on the partial Equality Impact Assessment (EQIA) suggested that diversity should be considered in a wider sense within the strategy, covering forestry and woodland users as well as those working within the sector. To address this, explicit reference to both attracting diverse talent to the forestry sector, as well as to encouraging a more diverse range of people to value and use forests and woodlands have been included within the priorities section.

6.8 Business and Regulatory Impact Assessment

- 6.8.1 Feedback on the partial Business and Regulatory Impact Assessment (BRIA) suggested respondents would have liked a wider range of organisations to have been consulted during its creation. However, there were no consistent calls for changes to be made to the assessment or associated changes to be made to the strategy. Taking account of changes made to the strategy following the consultation, the BRIA was updated and finalised.
- 6.8.2 Both the BRIA and the EQIA are available at:
<https://www.gov.scot/policies/forestry/forestry-strategy-project/>

7 Comments on the Environmental Report

7.1.1 The five questions used in the consultation to help frame responses on the Environmental Report are provided below. Corresponding views and comments received have been summarised in the sections that follow.

1. What are your views on the evidence set out in the Environmental Report that has been used to inform the assessment process?
2. Should any additional evidence sources be used in the Environmental Report? Please provide details.
3. What are your views on the predicted environmental effects as set out in the Environmental Report?
4. Do you agree with the conclusions and recommendations set out in the Environmental Report?
5. Please provide any other further comments you have on the Environmental Report.

7.2 What are your views on the evidence set out in the Environmental Report?

7.2.1 76 participants replied to this question. Substantive responses to the question came from a mixture of organisations (28 responses) and individuals (27 responses). There were positive responses from approximately three quarters of the organisations that responded. Some of these respondents suggested additions to consider, for example opportunities, issues or more context and/or provision of baseline data, or changes intended to give greater emphasis to certain topics (such as the importance of forests and woodlands in relation to Scotland's cultural and historic environment, links between the strategy and the UKFS, and more mention of forestry activity that damages the environment). One response called for more detail about how the evidence presented had been used to inform the assessment process. Some stakeholders commented that the biodiversity topic was missing from the Table 4 on page 37 of the Environmental Report.

7.2.2 The Scottish Government welcomes and notes this feedback. The baseline evidence was presented in Appendices C and D of the Environmental Report; showing the state of the current environment with some areas discussed further in the narrative of Section 3. The baseline evidence was used to inform the assessment of each priority and where interactions between the priorities and baseline receptors were identified, these were drawn out in greater detail. It was considered, given the high level nature of the strategy, that an assessment of the draft policy against each baseline indicator would be out of keeping with the scope and level of detail of the strategy.

- 7.2.3 Section 3.3 of the Environmental Report set out the likely evolution of the environment without implementation of the strategy by considering the current state of the environment, past trends detailed in Appendices C and D and the environmental opportunities/issues associated with the Forestry Strategy.
- 7.2.4 Similarly, the potential interaction of key effects of other plans, programmes and strategies with the Forestry Strategy were considered at a high level reflecting the strategic nature of the assessment and the likely environmental effects.
- 7.2.5 The evidence base was developed and refined in line with comments received at scoping stage in recognition of the inherent relationships between certain topics such as landscapes and historic assets. The historic environment was scoped into the assessment. However in light of the feedback from the SEA Consultation Authorities, changes have since been made to the Strategy to more clearly set out the need to protect and conserve important historic monuments and features.
- 7.2.6 The UKFS Compliance Procedure was launched in October 2018. This is a new process that will provide evidence on how the Scottish Government will ensure that relevant actions taken to support the delivery of the Strategy will meet the UKFS requirements. This formal process was established to ensure that breaches of the UKFS are properly dealt with, and that standards in sustainable forestry are maintained. It details the corrective actions or sanctions that will be sought from owners or their agents, sets out the process of investigation and explains the laddered approach to the actions that the Scottish Government will take. These procedures will apply to all Forestry Commission Scotland (Scottish Government) forestry approvals and consents (namely Forest Plans, Felling Licenses, Forestry Grant Scheme contracts, and Environmental Impact Assessment (EIA) consented operations), as well as illegal felling and non-consented EIA operations. They will not replace existing procedures, but will instead be undertaken alongside them and where legal procedures do not exist. Non-compliance with the UKFS could result in a warning letter with mitigation measures or the suspension or revocation of permissions. Further details of the UKFS Compliance Procedures can be found online⁴.
- 7.2.7 The omission of biodiversity as a topic from Table 4 on page 37 relates to a drafting error in that table and does not affect the overall assessment which included full consideration of, and reporting on the biodiversity topic.

⁴ Forestry Commission Scotland (2018) UK Forestry Standard Compliance: <https://scotland.forestry.gov.uk/images/corporate/pdf/UKFS-Compliance-Procedures-FCS.pdf> (accessed 04/03/2018)

7.3 Should any additional evidence sources be used in the Environmental Report?

- 7.3.1 53 participants responded to this question. Many respondents (27 individuals and 20 organisations) including the consultation authorities, offered substantive comments on the need for additional evidence sources in the SEA. The comments were varied; and each respondent referenced a different source or type of evidence. Comments included specific sources for review, consultation with specific stakeholder groups, more evidence and measurement of specific SEA topics and effects.
- 7.3.2 The Scottish Government is content with the level of detail included within the Environmental Report. Whilst the comments received and suggested evidence sources are not considered to alter the results of the assessment, where applicable, they will be noted for future reference.

7.4 What are your views on the predicted environmental effects?

- 7.4.1 This question received the largest number of responses on the SEA with 81 comments. A small number of participants agreed with the predicted effects. Many participants described potential impacts from the implementation of the draft strategy that they felt could be given a higher profile in the SEA. These varied according to the respondent and included: historic environment considerations, wider positive impacts of community ownership and management of forests; improved landscapes, provision of employment in rural areas; value of forestry for natural flood catchment; and, the contribution of non-native species to natural capital. Approximately a quarter of the respondents to this question felt there could have been greater consideration of the negative impacts of the expansion of forests, with specific mention of potential damage in relation to habitats and biodiversity, water quality and open landscapes. One respondent disagreed with conclusions on afforestation and a few felt that consideration of afforestation should have been expanded.
- 7.4.2 A few respondents discussed other factors that may affect some of the predicted effects. Comments received were varied and concerned different aspects of the assessment, for example, threats to new planting from deer, and on the importance of forests and woodlands in relation to the historic environment.
- 7.4.3 Other comments included suggestions that the high-level nature of the strategy impeded the ability to assess whether or not the predicted effects were likely. Some respondents shared their suggestions on which effects should be prioritised. Two participants suggested that they would like to see a range of alternative scenarios presented in the SEA; one asked for more detail about the SEA assessment process and on the mitigation of residual

effects. Another respondent sought further information and a commitment on how positive impacts will be achieved and negative impacts mitigated via implementation of the strategy; suggesting that the Environmental Report should identify those areas within the future action plan on which further assessment work should focus.

- 7.4.4 Given the high-level nature of the strategy, the Scottish Government considers that the assessment of effects was pitched at an appropriate level. Comments regarding mitigation have been noted and will help inform the strategy implementation process. Comments regarding implementation and monitoring are dealt with in section 9.

7.5 Do you agree with the conclusions and recommendations set out in the Environmental Report?

- 7.5.1 67 participants responded to this question. Just over half said they agreed with the conclusions and recommendations in the SEA. There were also some calls for more detail in the overall strategy and the SEA, these included: requests for greater consideration of an issue of particular interest to the respondent; calls for greater consideration of the potential negative impacts of the strategy, particularly in relation to habitat and biodiversity but also on the historic environment; and suggestions of alternative conclusions. A small number of respondents disagreed with assumptions and conclusions made in the SEA. These included concerns raised by the SEA Consultation Authorities in relation to ensuring compliance with the UKFS and the relationship between the Strategy and the UKFS. The Consultation Authorities also suggested that mitigation measures could be enhanced and proposals on next steps be better developed.
- 7.5.2 The Scottish Government is content with the level and scope of the assessment and believes it to be a proportionate assessment of all the SEA topics with conclusions and recommendations clearly noted within the report. The Strategy does not set out the actions which will be required to deliver the strategy and this will require action across a range of private and public partners which includes the Scottish Government, its agencies and other public authorities. Where applicable, the plans and programmes associated with this activity will themselves be subject to consideration in accordance with the requirements of the Environmental Assessment (Scotland) Act 2005.
- 7.5.3 Section 7.2 outlines how concerns around the historic environment and the links between the Strategy and the UKFS were addressed in the final Strategy, and section 9 discusses monitoring and implementation.

7.6 Please provide any further comments you have on the Environmental Report

- 7.6.1 A total of 55 participants responded to this question. Of these, 27 respondents provided substantive additional comments on the Environmental Report, typically reiterating points made in response to earlier questions. The SEA Consultation Authorities also called for: greater recognition of Scotland's historic environment in the Strategy and SEA; indicators to be developed and monitored in relation to heritage assets and cultural aspects of the landscape; the Strategy to be monitored widely against its impact on the environment, not just in relation to woodland cover; more detail to be provided on how environmental effects were considered during the Strategy's development since no reasonable alternatives were identified; and the opportunity to be involved in developing the next steps of the Strategy.
- 7.6.2 Other points included comments about the SEA document, for example in relation to its length and format; these varied from descriptions of finding it useful, to suggesting it was too long, to asking for inclusion of a direct link to the SEA within the strategy and other presentational considerations. There were also questions raised about specific matters of forestry practice or the baseline evidence.
- 7.6.3 The Scottish Government is content with the level of detail and extent of assessment in relation to the high level nature of the strategy. Detail of how comments on historic environment have been addressed is provided in section 7.2. Comments made in relation to alternatives are discussed in section 8 and monitoring is covered in section 9 of this report.

8 Reasons for selecting the Forestry Strategy as adopted

- 8.1.1 The 2005 Act requires that the Scottish Government identify, describe and evaluate the likely significant effects on the environment of any reasonable alternatives to the draft strategy, taking into account its objectives and geographical scope.
- 8.1.2 The extent to which alternatives could be considered 'reasonable' was influenced by the existing legislative and policy context the document must reference and align with, and the current Government commitments and targets such as the woodland creation target in the Climate Change Plan.⁵
- 8.1.3 The draft strategy was developed to articulate the Scottish Government's ambition to expand Scotland's forests and woodlands to deliver greater social, environmental and economic benefits; promote SFM; help deliver the aims of the Scottish Government's National Performance Framework; and, to meet the requirements of the Forestry and Land Management (Scotland) Act 2018 (FLM(S)A). The Act outlines the broad content of the Strategy (e.g. setting out a vision, objectives, priorities and policies etc.), as well as how it should be prepared and consulted on.
- 8.1.4 During the process to develop the draft strategy, the Scottish Government considered reasonable alternatives including the 'do nothing scenario'. Doing nothing was not an option as Scottish Ministers were required to develop a new strategy under the FLM(S)A).
- 8.1.5 Another alternative explored during the development of the draft strategy was to structure the strategy in a different way by grouping the draft priorities under specific objectives (economic, environmental and social). This was not considered feasible because it might inadvertently foster a siloed approach to delivery, undermining the principles of sustainable forest management and hindering the delivery of multi-purpose forestry.
- 8.1.6 As previously mentioned, a number of respondents to the consultation on the draft strategy suggested an additional alternative of applying ranking within the strategy – ranking of objectives, issues and priorities. This has been considered, however, in recognition of the interdependencies of the three components of sustainable forest management – economy, environment and society – ranking has not been introduced.

⁵ Scottish Government (2018) Climate Change Plan: Third Report on Proposals and Policies and 2018-2032 (RPP3): <https://www.gov.scot/publications/scottish-governments-climate-change-plan-third-report-proposals-policies-2018/> (accessed 18/02/2019)

8.1.7 In the finalisation of the Strategy, as previously detailed, the number of priorities was reduced from ten in the draft strategy to six in the final Strategy. The new priorities do not include any additions that would necessitate a further SEA to be carried out. Instead they are broader and more cross-cutting, better reflecting the principles of SFM.

9 Monitoring

- 9.1.1 Section 19 of the 2005 Environmental Assessment (Scotland) Act requires the Responsible Authority to monitor significant environmental impacts arising as a result of the implementation of the plan, programme or strategy. The purpose of the monitoring is to identify any unforeseen adverse effects at an early stage and to enable appropriate remedial action to be taken.
- 9.1.2 Due to the range of indicators that were suggested in the consultation responses and the importance of identifying the correct indicators to measure progress and the economic, environmental and social impact of the Strategy, the Scottish Government have committed to producing an implementation, monitoring and reporting framework within 12 months of laying the Strategy in parliament. This will include key delivery milestones, a set of indicators to enable us to monitor the delivery of the Strategy's objectives, and a reporting schedule that will include the dates for publication of the statutorily required 3-yearly progress reports. The Scottish Government have also committed to establishing a national stakeholder group to advise on, and support the implementation of the Forestry Strategy. The requirements of the 2005 Act will be fully incorporated into the monitoring framework and all relevant comments received will be considered.

10 Conclusion

- 10.1.1 The Scottish Government is content that the level and scope of the SEA is proportionate and that, given the high-level nature of the Strategy, it has been pitched at the appropriate level.
- 10.1.2 This Post Adoption Statement concludes the SEA process, setting out the ways in which the findings of the SEA Environmental Report and the views expressed during the consultation on the SEA Environmental Report, as well as on the draft strategy, have been taken into account within Scotland's Forestry Strategy 2019-2029.



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