



## **Environment and Sustainability Committee.**

### **Annual Scrutiny of NRW**

**April 9<sup>th</sup> 2015**

As a trade organisation representing the whole forest industry our submissions to the Environment and Sustainability annual scrutiny of NRW must be viewed in the context of our own, and our members, interactions with NRW which are mostly restricted to matters concerning the forestry portfolio of NRW.

#### **1. Communications with NRW**

Members still report ongoing issues with day to day working communications between themselves and NRW, they report examples of phone calls and emails still going unanswered for sometimes weeks. Many of these concern questions which often have commercial implications for them that our members need an answer to urgently. They are able to provide examples which do seem to be concentrated to employees at the less senior levels of NRW, however as these examples do contain business specific information we are not able to share them in a public format but we would be happy to share these with NRW in a more confidential forum.

In contrast communication at senior level are well above what would be expected, for example, emails to senior staff posted to them out of normal working hours are often responded to very quickly, sometimes responses are received back before normal working hours resume which is above expectations.

#### **2. Consistency of standards across NRW**

There are concerns by members on consistency of the interpretation of H&S and environmental standards by NRW staff on working sites, members report some staff seem overzealous in their interpretation compared to other NRW staff who take a lighter touch approach, this subject was also emphasised at the Customer Liaison meeting in March.

#### **3. Regulation**

NRW as a competitor in marketing timber is an ongoing issue; there is a sense of unfair competition partly due to the scale at which NRW is capable of operating at which the private sector cannot emulate. Large scale forest design plans instead of individual felling licences or the ability to mobilise expertise at a country wide scale should enable NRW to reduce the cost of forest management when judged on a cost per cu m of timber produced. The private forestry sector would like to take advantage of the benefits that NRW enjoy by using NRW in house expertise or greater co-operation to be able to operate at scale and so reduce costs.

We would also like to explore ways that the private sector can have a lighter touch regulation which would also reduce the burden of cost on the private sector?

For example, we have previously asked for the level of detail on felling licence applications to be reviewed, whilst we still have not received a positive response to this it is being actively discussed and we look forward to an satisfactory conclusion.

In the UKFS and forest and water guidelines there is a requirement for consultation and assessment when contemplating clear felling which exceed 20% of the total forest area within acid sensitive

catchment areas. An example has been brought to our attention where owners were told it was unlikely they would receive permissions to fell as the 20% figure had been exceeded, it seems that NRW was the owner that had taken this quota.

The guidance on this is not that there is an absolute limit but that when felling is likely to exceed that figure an assessment should be carried out and mitigation measures stated whereby the impact could be resolved. We have brought this subject up before with NRW and were told it was extremely unlikely this threshold would ever be reached.

As there are often multiple owners of forests in these areas and the requirements in UKFS are to consult adjacent owners, there should be a greater level of transparency from NRW on their forest design plans, the timing of harvesting plans and how those may impact on adjacent owners. There is a real need for someone to coordinate activities to ensure that the industry does not fall foul of regulations. As NRW is the legislative authority and should have information on what all private sector owners propose to do are they the obvious public body to perform the function of coordinating all forestry activities in catchment areas and disseminating that information to adjacent owners.

#### **4, Private sector involvement with Policy and Strategy Planning**

Annoyance around private sector involvement in policy, strategy and action plans that are subsequently not taken forward, sometimes due to a change of circumstances or a change in emphasis or instruction from elsewhere. We can understand the reason but the private sector does put a large amount of time and money into working with NRW and WG and it is frustrating when that work comes to nothing.

All the items above are either being discussed with NRW at a senior level or will be taken to scheduled meeting between the sectors, the private forestry sector believes we have the systems in place to resolve much of this and is committed to working with NRW for the benefit of the whole industry.

#### **5, Habitat creation programme**

There are concerns about the Habitats Creation programme that NRW is pushing forward, this has the potential to incur large costs to purchase land and change the use of that land for the purpose of creating specific habitats which may be lost in the future, whilst not a forestry matter we are concerned that the costs of this programme will divert funds from others areas of NRW work and would like assurance that if pursued the habitats creation programme will be funded from other sources, preferably from outside the NRW budget.

#### **6, Accounts**

We have previously called for a greater transparency in the published NRW accounts, the diversity of the remit of NRW means it is difficult to judge the performance in regard to managing the PFE and marketing of timber.

We suggest that the accounts show an income and expenditure figure for timber and non-timber items and that these are broken down into categories that are easily understood and judged by the general public.

We are told that NRW incurs costs which the private sector may not, public access for example and we accept this may be true, but as NRW is a competitor in the marketing of timber we do need to compare like with like and itemising income and expenses associated with timber production is a direct comparison. As the NRW landholding is large and diverse there are many costs like the management or overheads costs for the renewable programme or facilities for public benefit like visitor centres which are not associated with timber production and if included can obscure an objective comparison with the private sector.

Martin Bishop, Confor National Manager for Wales, Rheolwr Genedlaethol i Gymru .

1 Woodfield House, Bryn-y-gwenin, Abergavenny, NP7 8ABTel: 01873 857969 Mob: 07876 029482 Email: martin.bishop@confor.org.uk

[www.confor.org.uk](http://www.confor.org.uk) Confederation of Forest Industries (UK) Ltd. Registered office: 59 George Street, Edinburgh EH2 2JG

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1 Woodfield House, Bryn-y-gwenin, Abergavenny, NP7 8AB  
Tel: 01873 857969 Mob: 07876 029482 Email: [martin.bishop@confor.org.uk](mailto:martin.bishop@confor.org.uk)

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