

## **Comment on behalf of Friends of the Ochils on the draft 'Guidelines for respectful and constructive engagement in Forestry in Scotland'**

The Friends of the Ochils is a registered charity with over 140 members. It was established in 1993 and its aims and objectives are:

- to promote and conserve the landscape, natural beauty and wildlife of the Ochils, and to protect the historical and social character of the surrounding communities.
- to encourage consistent implementation of good planning policies appropriate to the other objects of the Association.
- To support responsible and well-behaved public access to the Ochils consistent with the Scottish Outdoor Access Code.
- To promote appropriate study of and research into relevant fields of interest pertaining to the Ochils and its local communities, and to promote dissemination of the results of such study and research.

We welcome the opportunity to comment on the draft 'Guidelines for respectful and constructive engagement in forestry in Scotland'. For many years we have commented to varying degrees on both forestry proposals and long term forestry plans both through agents and through Scottish Forestry and our comments are very much from our position as third party stakeholders.

### **Comments on the guidelines**

We are concerned that the proposed guidelines appear to have been developed without any apparent input from third party stakeholders and therefore we feel that they reflect only the views of those operating within the forestry sector itself such as Scottish Forestry, The Institute of Chartered Foresters and agents such as Scottish Woodlands and Tilhill.

Firstly, we have difficulty in understanding why another set of guidelines needs to be published when others already exist. The Confor guidelines published in September 2024 would seem to deal with issues similar to those covered in the proposed guidelines.

Furthermore, Scottish Forestry has also published its own guidelines 'Forestry Engagement and Consultation Processes' which set out the engagement and

consultation processes for forestry plans and proposals in Scotland. A plethora of guidelines runs the danger of creating confusion and a lack of clarity.

A further generalised concern relates to the lack of precision in the wording of some of the guidelines thus leaving the guidelines open to a range of interpretations. Advice such as 'as early as practicably possible' and 'provide reasonable time for feedback' could lead to uncertainty and possible disagreement.

Also, we feel that the considerable emphasis on unacceptable and threatening behaviour and detailed advice on how to deal with abusive behaviour is perhaps misplaced in a document such as this. Of course, such behaviour is totally unacceptable, but it is difficult to judge from the guidelines just how widespread it is. Our experience as an interested third party dealing with numerous agents and Scottish Forestry staff over the years makes us feel that such unacceptable behaviour is not widespread. If that is the case perhaps you may wish to consider a standalone document along the lines of the Scottish Government's Unacceptable Actions Policy which deals simply with such behaviour and does not deal with the delivery of good practice. Such good practice can be dealt with in documents such as the 'Confor Engagement with Local People and Good Communities Practice Guide'

Finally, to digress from the guidelines themselves, more fundamental to the issue of good practice in relation to forest management and forestry and woodland applications in general is our continued concern that the current system is not fit for purpose. Without going into too much detail, we would wish to see developed a system that is more in line with the planning application process used by local authorities for development management. Over the years we have had numerous discussions with Scottish Forestry at conservator level and with agents about the need for such a system and on various occasions we have been given an indication that a change to the application process was being considered and developed but to date nothing has materialised.

Such a system might even help to reduce the frustration with the current system that may give rise to the unacceptable behaviour that is the subject of the proposed guidelines. We certainly would wish to see a more open, transparent and predictable system than that which currently exists

I trust that our comments are helpful.

Stuart Dean. Chair, Friends of the Ochils