

TimberTransportForum

delivering solutions for a growing UK harvest

Timber Transport Forum response to PE1654 on Forestry Regulation

The Timber Transport Forum is responding to this petition because much of the context given by the petitioner refers to issues surrounding timber transport. This response explains the challenges of timber transport and the consultation process that is in place.

The [Forum's partnering charter](#)ⁱ is based on the idea of working together to achieve consensus and deliver practical solutions. **We believe this is a more effective way of managing timber transport issues than incorporating related consultation processes (about the use of roads) in forestry legislation.**

The Timber Transport Forum

The [Timber Transport Forum](#)ⁱⁱ is a voluntary partnership organisation set up in 2000 to address the issues raised by timber transport in Great Britain. The Forum includes representatives of the forestry and timber industries, the local roads authorities and various national agencies and organisations, including Forestry Commission Scotland and Transport Scotland (freight).

Scottish Forestry and Timber Transport

Scotland's forest area has expanded substantially since the 1950s to now cover 18% of Scotland. In some local authorities, such as Dumfries & Galloway and Argyll, forest cover is around 30%. As a result, timber production from Scotland's forests has grown from 1m tonnes /yr in 1976 to over 7.5m tonnes/yr today. It is forecast to increase to 10m tonnes/yr by 2030. A substantial processing industry has grown around this resource which feeds over 30 large processors including sawmills, board mills, a pulp mill, and various biomass fuel processors throughout rural Scotland. A [recent economic evaluation](#)ⁱⁱⁱ gave an industry value of £1bn GVA and employment of 25,000 jobs.

The Forum's own analysis funded by the Roads Maintenance Research Board estimates that timber comes onto the public road network from Scottish forests at around 3000 places, mostly in upland, rural Scotland and often onto the minor road network of council-managed, B, C and Unclassified roads. Many of these roads have minimum structure, drainage and geometry dating from the early 20th century. Moving several millions of tonnes of timber each year on standard 44 tonne lorries (27 tonne load) across this minor road network can have impacts on the fabric, structure and drainage of the roads, and on neighbours, communities and other road users.

To keep this impact to a minimum the Forum promotes the following voluntary measures:

- [Agreed Routes Map](#)^{iv}. The Agreed Routes Map covers around 10,000km of B, C and U class roads. This represents a sixth of all roads in Scotland. It sets out the hierarchy of roads for use timber traffic. The categories are:

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- **Agreed Routes:** Used for timber haulage without restriction as regulated by the Road Traffic Act 1988. A-roads are classified as Agreed Routes by default unless covered by one of the other TTG classifications below.
- **Consultation Routes:** Recognised as key to timber extraction but which are not up to Agreed Route standard. Consultation with Local Authority is required and it may be necessary to agree limits of timing, allowable tonnage etc. before the route can be used. B-roads and minor roads are classified as Consultation Routes by default unless covered by one of the other TTG classifications below.
- **Severely Restricted Routes:** Not normally to be used for timber transport in their present condition. These routes are close to being Excluded Routes. Consultation with the Local Authority is required to achieve an agreed management regime to avoid land-locking of timber.
- **Excluded Routes:** Should not be used for timber transport in their present condition. These routes are either formally restricted, or are close to being formally restricted, to protect the network from damaging loads. Consultation with the Local Authority is required to explore alternatives.

The majority are categorised as ‘consultation routes’ and this prompts those involved in the harvesting and transport of timber to consult the local roads authority (councils) to discuss the transport and agree appropriate voluntary management of the road and/or the traffic to minimise impacts on the road and disruption to other road users thereby sustaining the road network.

- [Timber Transport Groups](#)^v. There are 7 timber transport groups covering 11 rural councils. The groups are a parallel local partnership of industry and roads authority representatives meet 2-3 times a year to establish good communications, discuss timber transport issues, highlight any concerns that have been raised and propose any changes to agreed routes maps or suggest traffic management measures that may be appropriate. The groups, and the GB Forum, are supported by part time project officers.
- [Good Practice](#)^{vi}. The Forum produces good practice guidance covering safe loading, load security, agreed routes, consultation with local roads authorities and other stakeholders and managing timber operations close to public roads. We have also produced technical guidance on lower impact lorry technologies which can help to reduce the impact of heavy lorries on the road structure. Some of the groups produce their own local good practice guidance and [protocols](#)^{vii}.

Within the context of these voluntary measures and subject to the voluntary implementation of the Agreed Routes Map process, the forest and timber industries presume the right to use the unrestricted public road network for timber transport. There is no such voluntary arrangement in place for other rural industries using the minor road network (whisky, agriculture, fishing, fish farming, quarrying, construction, wholesale etc.). Similarly, the voluntary partnership does not limit the council’s statutory powers, as roads authority, to restrict traffic on the public road to protect the road network where necessary.

This voluntary partnership is effective and has enabled the expansion of the Scottish timber industry over the last two decades adding value to our forest resource and helping this 'carbon positive' industry become a major driver in rural development and employment.

The voluntary partnership has also sustained the local roads networks without investing the huge resources needed to fully upgrade the infrastructure to suit modern haulage vehicles.

However, this approach obviously impacts on the efficiency of the supply chain and the tonnage that can be hauled daily.

Rural Road Infrastructure

The Forum recognises that the development of the rural road network has not kept pace with changing forest cover, despite its long-term nature. The Forum regularly presents information to councils and to the Scottish Government on medium to long term timber transport requirements. We proposed, and support the continuation of, the Scottish Government's [Strategic Timber Transport Fund](#)^{viii} and the associated scheme which provides national co-finance to public road improvements and other projects to reduce the impact of timber traffic. This fund has been running for 12 years and has contributed over £26 million to projects worth over £50m.

We recognise that there remains a significant gap between the demands of our land use and the infrastructure that serves it. Audit Scotland's [report on road maintenance](#) last year showed that the condition of local roads in rural Scotland is poor; on average around 60% are in good condition and in some areas this figure is much less. Even those in good condition may not be suitable for haulage from large scale timber operations. There are not the resources to maintain local road infrastructure at a reasonable level for timber transport, let alone invest in much-needed modernisation for 21st century land uses and businesses. The Forum encourages Scotland's Land Use Strategy and National Transport Strategy to take account of the infrastructure requirements of modern rural land use and is working with other rural sectors to make the case for a step change in rural transport infrastructure investment to ensure economic opportunities for people throughout Scotland.

In the meantime the forest and timber industries (unlike any other rural industry) continue to take voluntary measures to manage timber transport. These voluntary measures impact on the efficiency and profitability of the timber supply chain.

Timber Transport and Consultation

In general, use of the public road network does not require consultation with councils or the public. Unless a road is weight restricted, or the vehicle is oversized, traffic is free to use it. Use of the road is governed by the Roads (Scotland) Act 1984 and the Road Traffic Act 1988. Traffic Commissioners are responsible for the licensing and regulation of those who operate heavy goods vehicles.

Councils do have powers to categorise certain traffic operations as 'Extraordinary Traffic'. The recent UK Government's [response to Report of The Forestry Regulation Task Force](#)^{ix} in 2012 considered this an inappropriate mechanism to manage haulage from 18% of the land area (30%+ in some areas) and considered the local voluntary measures in place, to be appropriate.

The [UK Forestry Standard](#) (UKFS) sets out in 224 pages the (UK) Government's approach to sustainable forestry.

Forestry Commission Scotland as the regulating body for forestry in Scotland uses the UKFS as the basis for licensing the felling of timber and for the approval of management plans.

The UKFS states:

Where minor public roads and bridges are weak, consideration can be given to how the forest road network can be designed or upgraded, to avoid using public roads for timber transport. In many areas, there are timber transport groups that involve local authorities and advise the forestry industry on preferred routes and the options for using rail or sea alternatives to road transport. Where there are particular sensitivities with timber transport, it should be addressed as part of the forest management planning process.

These *particular sensitivities* are often identified by the work of the timber transport groups and indicated by the agreed routes maps.

Where there are sensitivities, Forestry Commission Scotland expects to see evidence of consultation over timber transport at the scoping stage of the management planning process. Where felling is managed through a felling license, again FCS will ask for evidence of liaison with the relevant roads authority.

Scoping or liaison will normally be done by the forest management company initially through the local authorities who are statutory consultees to management plans and felling licenses. Where sensitivities are highlighted, there may be further communication by the industry with community councils informing them of proposed operations. In certain circumstances, consultation by the industry may go down to communities and households adjacent to concentrated forest operations. It is not uncommon for timber haulage to be adapted to take account of, for example, school pick up and drop off times for small rural primary schools.

The [UK Woodland Assurance Standard](#)^x is used by most of the industry as the basis for independent sustainability certification for marketing purposes. This sets out consultation requirements and, under section 7.4.2, mentions timber transport impacts under 'minimising adverse impacts' and requires:

Documented evidence that owners/managers have considered actual and potential impacts of operations on local people and interest groups and have taken steps to mitigate them.

The certification process ensures the forestry industry engages with neighbours, communities and individuals and this must continue to be encouraged.

Sea transport of timber

The petition mentions the use of sea as a way of taking timber traffic off rural roads. This has been a major development in recent years. The [Timberlink service](#)^{xi} is a public service contract operating under an EU derogation for peninsulas that supports the shipping of timber from forests in Argyll to timber processors in Ayrshire. The support from the

Strategic Timber Transport Fund pays the additional cost of haulage by sea rather than by road. However, the first leg of haulage from the forest to the harbour is by road.

The fund has also supported the use of floating piers and the development of a landing craft to transport timber from islands and from coastal forests distant from trunk roads or processors. In a handful of cases this obviates the need for local road haulage.

Where there is a road haulage option this is usually significantly cheaper. The state aid approved mechanisms to support a mode shift to sea transport would appear not to be suited to the scale and nature of forestry operation as uptake of these grants has been limited. The Forum is currently reviewing this subject and will offer suggestions for a review of coastal shipping support mechanisms in due course. Barriers to modal shift are various and were highlighted in the Forum's response to the Scottish Parliament's Infrastructure and Capital Investment Committee [Inquiry into freight transport in Scotland](#)^{xii}.

Critically, however, modal shift will rarely diminish the need for initial road haulage from the forest.

In the circumstances prompting this petition and for the situation in Dumfries and Galloway with 30% forest cover and a relatively high density of processing capacity, coastal shipping would not offer a viable or sensible alternative to road haulage operations.

Conclusion

The Forum believes that the voluntary partnership approach is a more effective way of managing timber transport issues than incorporating related consultation processes (about the use of roads) in forestry legislation.

The Timber Transport Forum hopes this information is useful to the committee in assessing this petition.

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ⁱ <http://timbertransportforum.org.uk/attachments/article/3/TTF%20Partnering%20Charter%202012.pdf>

ⁱⁱ <http://timbertransportforum.org.uk/>

ⁱⁱⁱ <http://timbertransportforum.org.uk/attachments/article/123/economic-contribution-forestry-2015.pdf>

^{iv} <https://timbertf.maps.arcgis.com/apps/webappviewer/index.html?id=cd6737077f1044728a121c8e311d781f>

^v <http://timbertransportforum.org.uk/groups>

^{vi} <http://timbertransportforum.org.uk/work/good-practice>

^{vii}

<http://timbertransportforum.org.uk/attachments/article/87/STTTG%20Timber%20Transport%20Protocol%202013.pdf>

^{viii} <http://scotland.forestry.gov.uk/supporting/forest-industries/timber-transport/strategic-timber-transport-fund>

^{ix}

<http://timbertransportforum.org.uk/attachments/article/123/Government%20Response%20to%20Forest%20Regulatory%20Task%20Force%20correct%20version%202012.pdf>

^x <http://ukwas.org.uk/>

xi

<http://timbertransportforum.org.uk/attachments/article/118/FCS%20Publication%202014%20Case%20Study%20Timberlink.pdf>

xii

<http://timbertransportforum.org.uk/attachments/article/123/Scottish%20Parliament%20Enquiry%20Freight%20Infrastructure%202015.pdf>