

## BrewDog's Dead Forest and the dead-hand of Scotland's forestry grants system

### Description



Destructive planting of the Lost Forest – most of the Scots Pine planted in the foreground are now dead

In mid-February ([see here](#)) I described how many of the trees planted by BrewDog, as part of the Phase I creation of its Lost Forest, had died and how they appeared to be investing little, if any, of their own money in the whole disastrous project. A week after the post I received a response from Scottish Forestry to an information request I had submitted in December about the number of trees that had died, any related correspondence with BrewDog or their agents and the amount of forestry grant they had disbursed to date.

The response ([see here](#)) stated Scottish Forestry had paid BrewDog £690,986.90 to date and confirmed that a very high proportion of the planted trees had died:

Scottish Forestry has not carried out a full site survey nor received information from the applicant on their stocking density assessment. However, a number of SF staff did a site inspection on 7<sup>th</sup> September 2023. They noted that the fence and species boundaries were as per the agreed grant contract.



- For the pine, they noted the initial planting density of 1600/ha was achieved but there was high mortality of trees across the site with an initial estimate of 50 to 56%.
- For the birch, they noted an estimated planting density of 1700 and did not comment on mortality of this species within the inspection report.
- Within the native broadleaved option area they noted very high mortality of around 95% at the inspection.

These figures were taken from an Inspection Report which was sent along with the response.

Most of BrewDog's Phase 1 Forest was planted with Scots pine and birch, trees which I had previously shown were naturally regenerating all over the site. The area of native broadleaf planting, almost all of which is now dead, was much smaller:

Species/option	Stocking density	Area (ha)	Derived Minimum expected tree numbers
Scots Pine	1600	115.57	184912
Birch	1600	141.98	227168
Native broadleaves (Oak)	1600	28.1	44960
Birch – low density	500	5.96	2980
Designed open ground		23.77	

According to Scottish Forestry's first information response, therefore, of the trees BrewDog had planted to create their Lost Forest a minimum of 92,456 Scots Pine and 42,712 oak and other broadleaves had died by last September.

From the areas I had seen, however, I thought the 50-56% estimate for Scots Pine mortality was on the low side and I also wondered why Scottish Forestry had not estimated mortality among the birch, which made up just over half of all the trees planted. I therefore asked Scottish Forestry for any further information they held on what had happened.

The response, [2024-00390478 Nick Kempe reply](#), which I received on 19th March, clarified four staff had visited the site on 7th September and the primary purpose of the visit was to ensure the fences which had been erected and the trees which had been planted were in accordance with Scottish Forestry's contract. Unfortunately, a computer error in Scottish Forestry's favour means much of the data relating to the inspection had been lost:

1) The attached file titled "21fgs62745 lost forest site inspection report 07-09-2023.pdf" is the output from one pair of assessors which shows the location of plots and notes taken at the time. There were technical difficulties with the tablet they were using, hence notes were written into the map and data captured when they returned to the office. The field map was not retained after the information was captured.

2) The attached file titled "inspection report – 21fgs62745-No\_Date.pdf" is the output we have from the other group. This contains the photographs which were downloaded, but unfortunately the notes were not downloaded and filed, and are not now available from the tablet due to a factory reset of the device to accommodate a move to corporate cloud storage. A further 12 photographs were taken during the inspection and these are attached for completeness

This is all of the data that we have available from the inspection.

Despite that unhappy accident and the decision to bin one of the field maps some of the additional information that was supplied – and all credit to the Scottish Forestry staff who recorded this – is very revealing:

PLOT	KEY SPECIES	NO.OF PLANTED TREES	NO.OF PLANTABLE GAPS	NO.OF DEAD TREES	% dead	OTHER NOTES
PLOT 1	BIRCH	23	3	N/A		LOADS OF BIRCH PLANTED TREES
PLOT 2	BIRCH	15	2	N/A		MANY OF THE ACROSS SITE
PLOT 3	BIRCH	15	4	N/A		MANY OF THE
PLOT 4	BIRCH	15	0	N/A		MANY OF THE
PLOT 5	BIRCH	19		15	79%	LOTS OF BIRCH
PLOT 6	SCOTS PINE	25		14	56%	MORE THAN 1
PLOT 7	SCOTS PINE	16		8	50%	HALF OF PLANT
avg	birch	17				
	SCOTS PINE	21				

date of site visit 07/09/2023- survey done by [REDACTED]

Data from team number 1 (above).

This shows in three out of the five small plots of birch planting that were sampled "about half were dead". If that was replicated across the whole site it would mean at least 60,000 of BrewDog's birch have died. To add to BrewDog's woes, in four out of the five birch plots "many of the planted trees had been browsed". At the same time in two of those plots – and in the two sample plots where Scots Pine had been planted – there was extensive natural regeneration of birch (and in one "a few" Scots pine established through natural regeneration). One could hardly find a better illustration of the failures of Scottish Forestry's grant system.



First, BrewDog and Scottish Woodlands had justified planting trees at Kinrara on the basis that there was limited scope for natural regeneration:

*“Some regeneration is occurring on site, though with browsing pressure at moderate levels, none of this is successfully establishing. Current seedling counts in the areas marked for natural regeneration is less than 50 trees per hectare on average at heights less than 10cm with heavy browsing damage.”* (FGS WIG – Habitats and Species Supporting Information).

In my view that claim was totally unfounded and there was evidence that significant natural regeneration was being established across the site before it was fenced ([see here](#)). Scottish Forestry, however, chose to accept this claim and the associated plan, which set aside limited areas for natural regeneration, instead of getting their own staff to check what was happening on the ground. Scottish Forestry’s own assessors have now shown that naturally regenerated trees are doing far better than planted trees in the very areas where it was claimed natural regeneration wouldn’t work due to a lack of seed source etc. Proof that there was indeed a “Lost Forest” waiting to return and all that was needed to make this happen was to keep deer numbers low.

Instead, Scottish Forestry and BrewDog decided to plant a new forest, financed with large sums of public money, with disastrous consequences for nature ([see here](#)) and carbon emissions ([here](#)).

Second, Scottish Forestry’s assessors have demonstrated that forking out significant amounts of public money to BrewDog to protect the planted trees with deer fencing round the site hasn’t worked:

<b>Inspecting Maintenance:</b> The site is well protected and allows the ongoing establishment of the trees.	Yes	Scheme breach	
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21FGS62745 - Lost forest WC Phase 1 -FGS Forestry Options Inspection Report

**\* Comment:**

The scheme was well protected by a perimeter fence. However, the applicant will need to manage deer which have been fenced in (evident from tracks and browsing).

According to the Lost Forest plan which forms part of the Woodland Grant contract:

*“Herbivore control within the fenced enclosure will endeavour to keep these areas free of deer, though low levels of roe deer and hare pressure is expected. Types of herbivores and details about control methods are included in the Woodland Creation Deer Management Plan and its appendices”.*

It would appear that after trapping deer within the fence, BrewDog has failed to cull them as promised, while the fence itself may have kept out predators such as foxes which could have helped keep hare numbers under control.

Third, because nursery grown trees are far more nutritious than their naturally regenerating counterparts or the surrounding vegetation, having been grown with fertiliser, deer and hare browse them preferentially. This, together with the mounding and the drought last summer, helps explain why so many planted birch have died, despite the generally small number of deer, while the natural regeneration is flourishing.

### Site Inspection Points

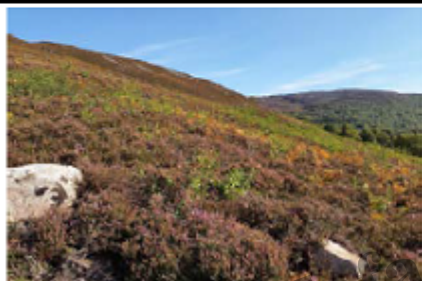

Point Reference	Rectifiable Breach	Action Required	Notes
			Nat regeneration
Photos			
			

Photo of natural regeneration from inspection report

Point Reference	Rectifiable Breach	Action Required	Notes
			browsed
Photos			
			

By contrast a browsed planted tree.....

To add to the disaster, correspondence released in the first FOI response also revealed that Scottish Forestry staff had found that a significant number of the trees planted by BrewDog were from “an unsuitable” seed source and because of that initially decided 28,150 needed to be removed:

I have worked out which trees are from unsuitable seed zones and have the following:

seed zone	
106	7050
105	15000
204	300
302	1550
405	2550
40?	1650
unknown	50
Total	28150

This is equivalent to approximately 17.5ha.

Seed zones 106 and 105 aren't agreed and are unsuitable, unless you can demonstrate that the seed was collected from a similar location to the planting site.

We will require a remedial plan which will state how this will be rectified and a time scale for completion. You will also need to provide seed certificates for the replaced trees showing they are from the suitable seed zone.

The explanation for this is that considerable effort has been devoted in the last 30 years to maintaining genetic diversity among certain species of native trees and as a result Scotland has been divided into seed zones with planted trees being sourced from local seed zones. This was reflected in Scottish Forestry's contract for the Lost Forest:

*"All stock will be sourced from local seed material (Native Seed Zone 201, Indigenous Scots pine seed zone 'Northeast' or 'East Central') where this is available. If locally seed sourced stock is not available, alternative nearby seed zones will be discussed and agreed in advance with Scottish Forestry. Planting will be carried out in line with current guidance including Bulletin 112."*

Further emails reveal that instead of enforcing this requirement Scottish Forestry then capitulated and decided that the majority of trees from the wrong seed zones would be allowed to remain:

From: [REDACTED]  
To: [REDACTED] @scottishwoodlands.co.uk  
Cc: [REDACTED]  
Subject: RE: Lost Forest Claim  
Date: 04 October 2023 12:32:00  
Attachments: image002.png  
image005.png

Good afternoon, [REDACTED]

In [REDACTED] absence [REDACTED] on leave) I would like to let you know that on the basis of the information supplied to date we'll approve the claim. As per the email exchange between [REDACTED] and [REDACTED] earlier in the year, we'll accept trees from seed zones 105 & 106 as suitable. However, as per [REDACTED] and [REDACTED] emails, the trees from more distant zones 204, 302, 405 and unspecified 40 can't be accepted. Given the high rate of tree mortality on site and the scale of beat up operation required, we're progress the claim on the basis that trees from suitable seed zones will be used. Could you supply, at your earliest convenience, the remedial plan, as per [REDACTED] email below, please?

Kind regards

[REDACTED]  
Operations Manager  
Scottish Forestry  
Highland & Islands Conservancy  
Woodlands | Fodderty Way | Dingwall | IV15 9XB  
Mobile: [REDACTED]  
[REDACTED]@forestry.gov.scot

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Why bother with seed zones at all then? The underlying problem here is that Scottish Forestry's only real interest is in meeting the Scottish Government's planting targets and they will allow no other policy to get in the way of this.

Two statements made by Scottish Forestry in their information responses are revealing in this respect:

*"It might be useful to clarify the purpose of the admin inspection that was carried out. It is to ensure that the capital items claimed are in place and that the boundaries of the different options are as per the contract. A few plots were put in to establish the mounding and planting spacing to check compliance with the option requirements."*

**Comment:** the reason staff are required to inspect new woodland planting is purely administrative, to ensure planting targets have been met and that the various elements of the forestry grant have been spent as agreed. Consideration of ecological matters, such as the impact the planting may have had on soils, play no part in the inspection process.

*"It may also be useful to note that the cost of purchasing replacement trees and for replanting to replace any losses will fall to the landowner and not the public purse. SF will expect full stocking at establishment (year 5) as per the grant contract and a further inspection will normally be undertaken at that point to confirm the grant conditions have been met and validate the grant payment."*

**Comment.** While the forestry grants contract formally hands responsibility for meeting "stocking densities" onto the grant recipient after the initial planting there are serious questions to be asked about the extent to which this protects the public interest. From the information provided, it appears that Scottish Forestry will continue to disburse annual installments of the grant for the next four years whether BrewDog has taken any action to replace the dead trees, replace those from inappropriate seed zones or cull deer as required by the Deer Management Plan. All that matters to Scottish Forestry is tree density in five years time and after that they absolve themselves of all responsibility for what

happens to native woodland planted with public money.

Having lost or binned most of the records from the assessment visit, it will be very difficult for Scottish Forestry to distinguish between naturally regenerated and planted trees in five years time and that will likely let BrewDog off the hook for significant parts of the site.

This whole system appears designed to enable Scottish Forestry to count any planted tree as contributing to their planting targets, whether or not the tree has survived or has to be pulled up because it is from the wrong seed source, and ignores natural regeneration in favour of vested interests in the forestry industry. It is to the credit of the Scottish Forestry staff involved in the inspection that they made some attempt to describe all the dead trees and natural regeneration at Kinrara, despite not being required to do so. However, they are powerless to change this ecologically destructive system of publicly financed greenwashing.

## **The legal challenge to Scottish Forestry at Stobo Hope – an opportunity for change**

Although Phase 1 of the Lost Forest is in the Cairngorms National Park and adjacent to Craigellachie National Nature Reserve, neither the Cairngorms National Park Authority nor NatureScot opposed it publicly. Now the extent of the tree planting disaster has been officially confirmed by Scottish Forestry, it is not too late for either body to up their game and call for a review of the Woodland Grants Scheme.

It says something about the Scottish Government's control over public authorities and the voluntary sector, however, that the most likely source of challenge to Scottish Forestry is likely to come from local communities and organisations which do not depend on government for funding. There has been much local concern on Speyside about the Lost Forest, which is in walking distance of Aviemore, but so far no organised opposition such as is now emerging in the Scottish Borders.

At Stobo Hope, west of Peebles, Scottish Forestry has awarded a £2m grant to a “trust” based in a tax haven to plant Sitka Spruce on an area of moorland which is designated a National Scenic Area.





The patches in the photo have been caused by heather cutting, a less damaging activity than muirburn. Photo credit Stobo campaign.

There is now a local campaign which has produced an excellent video about the proposals ([see here](#)) and has opened a crowdfunder ([see here](#)) to raise funds to challenge Scottish Forestry's decision through a judicial review. With Scottish Forestry having decided an Environmental Impact Assessment was not required – contrary to the advice of NatureScot – and the Royal Society of Edinburgh, no less, having recently published an excellent report calling for an end to public subsidies for commercial forestry ([see here](#)), any court action would appear to have a reasonable chance of success and could help force Scottish Ministers to reform the whole Scottish Forestry grants system.

The land at Stobo Hope, like Kinrara, may have been affected by intensive grouse moor management but the way to restore nature and help lock up carbon from the atmosphere is not, as the video shows, to dig it up and plant it with trees. I would hope that readers who can afford to do so will consider supporting the Stobo crowdfunder.

### **Category**

1. Cairngorms
2. Other parts Scotland

### **Tags**

1. CNPA
2. conservation
3. Deer
4. forestry
5. Governance
6. scottish forestry
7. Scottish Government

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