

Trees for Life

FINAL Ver 1.3 SM100925

Scotland's Net-Zero Infrastructure (SNZI) – Trees for Life Policy 2025

1. Background

Trees for Life recognises the growing role of large-scale infrastructure, as part of Scotland's transition to net-zero. Our organisation is rooted in a deep commitment to restore the Caledonian forest and reverse nature loss, but we also understand that meeting environmental challenges demands pragmatism and courage. We are therefore prepared to engage constructively with Scotland's Net Zero Infrastructure (SNZI) agenda, so long as it aligns with our values, strategic priorities, land management plans, and delivers real, lasting benefits for nature. This policy sets out how we will carefully navigate the intersection of climate and biodiversity, ensuring that any partnership or decision supports not only a net-zero future, but also a thriving natural world.

Scotland's Net Zero Infrastructure (SNZI) can contribute to Scotland's target of becoming net-zero by 2045; this involves the development of significant new infrastructure including windfarms, electricity transmission lines, solar farms, pump storage facilities and others. These SNZI projects may result in a loss of biodiversity, exacerbating the nature emergency and jeopardising efforts to halt nature loss in Scotland by 2030.

The development process and on-site working practices can minimise damage to biodiversity and work post-development can restore damaged and lost habitats, but this is not always possible. While not yet mandated in Scotland, there is growing commitment from SNZI developers to deliver biodiversity net-gain (BNG) from their developments. This includes the setting aside of very significant funds for off-site and on-site biodiversity enhancements.

BNG principles are also being applied to other developments in England and Scotland's National Planning Policy Framework Policy 3b requires significant biodiversity enhancements for major developments. This could lead to funding being available for biodiversity enhancements off-site and on-site.

2. Policy purpose and use

This policy sets out how Trees for Life will:

- Evaluate and respond to proposals for SNZI developments on land owned or managed by Trees for Life
- Engage with funding opportunities arising from SNZI related projects, including BNG commitments and off-site mitigation
- Maintain its values and ethical position while contributing constructively to Scotland's net-zero transition

It does not consider:

- How Trees for Life will respond to funding opportunities arising outwith SNZI funding opportunities – such opportunities should be considered using the existing Ethical Fundraising Policy

This policy applies if:

- Developers propose SNZI infrastructure on land owned or managed by Trees for Life

- Trees for Life is approached to receive funds or collaborate on nature restoration linked to SNZI projects
- Funding is established by SNZI developers, that Trees for Life may apply for

3. Governing principles of our SNZI policy - Evaluation Framework

Whenever our SNZI policy is applied, the following principles will act as an evaluation framework:

- A balanced evidence-based approach, in line with our values. Trees for Life recognise there will be a need to balance many differing aspects (specifically the balance between net-zero benefits and biodiversity impacts, but also wider financial, social and reputational issues - in both the long and short term).
- Each potential SNZI proposal will be assessed and reviewed on a case by case basis with all due consideration taken, taking account of cumulative impact in areas where there is significant other development
- Risk management - there may be occasions in which the risks of involvement in SNZI may outweigh the benefits to rewilding. In these cases, **the Governance subgroup of the Trees for Life Board will assess the risks so the Board can make an informed decision**

In other cases, decisions will usually be made at Senior Management Team level, involving the Board at an early stage and updating them as screening of proposals and companies is undertaken

- Honesty and transparency – in each case where our SNZI policy is applied, we will be open and clear in our communications and state, where appropriate, our reasons for accepting or declining involvement

This framework will be applied to each SNZI proposal to ensure a thorough, balanced, and transparent decision-making process. Only proposals that meet a high standard across environmental, social, financial and reputational considerations will be progressed. This ensures that any involvement contributes meaningfully to net-zero while delivering lasting benefits.

4. SNZI Development on Trees for Life Landholdings

4.1 Background

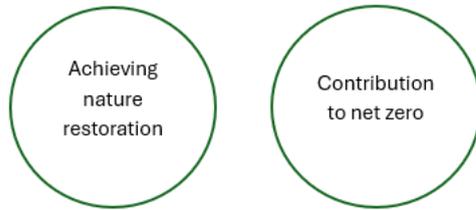
Dundreggan is Trees for Life's only current landholding. It is a prime location for SNZI developments. The Beauldy-Denny overhead powerline already runs across the estate and additional transmission line infrastructure will be installed to service the Tomchrasky windfarm. Most neighbouring estates have either established windfarms on site or are in the process of developing them, all of which have an impact on biodiversity at Dundreggan. Further SNZI developments, including additional powerlines and windfarms, are proposed for Dundreggan by SNZI developers from time to time.

4.2 Trees for Life Policy

Trees for Life recognises that its landholdings could make a positive contribution to net-zero through SNZI developments, but there is the potential for irreparable damage to habitats (especially peatlands) as a result of such developments and the access required. When considering SNZI proposals on its land, it will assess the pros and cons to make a balanced decision with the ambition of achieving significant BNG in all cases.

The diagram below indicates the key factors to consider during the assessment

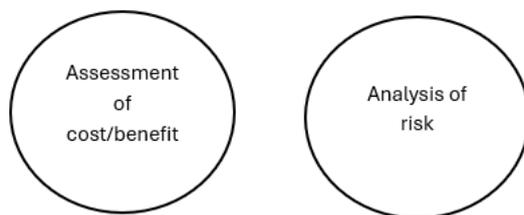
Drivers for involvement



Factors to consider (Assessment may indicate positive or negative impacts)



Analysis should identify



4.3 SNZI Assessment

Trees for Life will therefore consider and apply the framework in the following way when considering proposals for SNZI developments on its land:

Net-zero benefits – we will seek an assessment from the developer of the contribution the proposal will make to net-zero. This could be direct benefits such as the amount of renewable energy generated or indirect benefits such as the amount of renewable energy transmitted from source to consumers.

On-site biodiversity impacts – we will make an initial assessment of the potential biodiversity impacts to inform ourselves about whether to discuss SNZI proposals further. If this assessment concludes that significant, irreparable damage to irreplaceable habitats is unavoidable, we will decline involvement if possible or seek alternative arrangements for unavoidable developments, such as alternative siting for essential infrastructure.

If we conclude that significant, irreparable damage is avoidable or restoration is possible, we will seek a detailed assessment from the developer, including detailed surveys and environmental impact assessments.

Off site biodiversity impacts – we will seek an assessment of possible off-site biodiversity impacts from the developer, including impacts during construction and operational phases.

BNG impact – we will seek details of any policies and specific proposals for BNG enhancements from the developer

Financial impact – we will seek details of any unrestricted financial payments that could be made to Trees for Life as a result of the development. In our evaluation of the overall impact of a proposed development we will consider the BNG that can be achieved through Trees for Life use of these funds.

Social impact – we will seek clarification from the developer of any efforts they will make to minimise social impact (e.g. noise pollution, visual impacts) and deliver social benefit (e.g. community investment, local employment)

Reputational risks – Trees for Life will assess any reputational risks from being associated with avoidable SNZI development on its land

5. Other SNZI Opportunities

5.1 Background

The climate of the Scottish Highlands make many areas prime locations for SNZI developments, especially windfarms. To deliver the power generated to where it is needed, powerlines, sub-stations and other infrastructure is also required. Climate and topography also make the Highlands the prime location in the UK for hydro-electric power and hydro pump storage schemes.

Significant SNZI such as this is accompanied by funding for wider social and environmental benefit. Trees for Life already applies for funds available as a result of windfarm developments. Some SNZI developers have approached Trees for Life about a more strategic relationship in delivering nature restoration in the wider landscape.

5.2 Trees for Life Policy

Trees for Life recognises the significant contribution SNZI can make to achieving net-zero by 2045. It acknowledges that the funds made available as a result of SNZI could make very significant contributions to nature restoration and tackling the nature emergency. However, the development and implementation of SNZI projects may result in irreparable damage to biodiversity in some cases.

When considering whether to work with SNZI developers, Trees for Life will assess the developers' approach and make a balanced decision. Its ethical fundraising policy will be applied and the following SNZI Assessment criteria considered. Board involvement in any assessment will be on a case-by-case basis in line with processes adopted in our ethical fundraising policy. The board will make a final decision about whether to proceed.

5.3 SNZI Assessment

Net-zero benefits – we will seek details of the net-zero benefits delivered by the developer, including renewable energy generated and/or transmitted

On-site biodiversity impacts – we will seek details of how the developer avoids irreparable on-site impacts through either access or direct development and, delivers on-site restoration and enhancements

Off-site biodiversity impacts – we will seek clarification on how the developer considers potential off-site biodiversity impacts in its projects and seeks to mitigate against them

BNG impact – we will seek details of the amount of BNG the developer seeks to deliver through its investments in nature restoration

Financial impact – we will seek details of any unrestricted financial payments that could be made to Trees for Life as a result of any relationship and assess the BNG that Trees for Life can achieve using these funds.

Social impact – we will seek details of how the developer ensures social benefits from its developments, while minimising negative impacts

Reputational risks – Trees for Life will assess any reputational risks from being associated with any SNZI developer

5. Due Diligence

Due diligence will be undertaken for every SNZI developer. Any data recorded in due diligence checks will be kept in accordance with GDPR and Data Protection regulations.

6. Conflict of Interest

We reserve the right to consider carefully and potentially reject relationships with developers that might compromise our reputation, independence and work.

We will not work with organisations whose activities appear to be in direct conflict with our work.

These activities may include but are not restricted to:

- Working directly in fossil fuel extraction
- Working in the tobacco industry
- Excessive climate change impacts
- Direct or indirect involvement with Modern Slavery
- A poor Human Rights record
- Trade that could result in tree disease impacts, loss of biodiversity or poor wildlife management

7. Review and Governance

This policy will be reviewed regularly and updated as needed to reflect changes in national policy, scientific understanding, and Trees for Life's evolving strategy. All major decisions under this policy will be reviewed by the Senior Management Team and, where appropriate, the Board of Trustees.

Version 1.3 10 September 2025

This policy has been agreed by the Board of Trustees and endorsed by the Senior Management Team.